



ST. LOUIS
HOUSING
AUTHORITY

BOARD OF COMMISSIONERS

REGULAR MEETING

MARCH 30

2023





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, March 30, 2023, 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: March 24, 2023

ST. LOUIS HOUSING AUTHORITY

Attachment

***Instructions For Joining Zoom**

Meeting ID: 863 741 1301

Via Smart Phone or Computer:

<https://us02web.zoom.us/j/8637411301>

Via Phone:

(312) 626-6799, then 863 741 1301#

BOARD OF COMMISSIONERS, ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING, MARCH 30, 2023, 4:30 P.M.
ST. LOUIS HOUSING AUTHORITY, 3520 PAGE BOULEVARD
ST. LOUIS, MISSOURI 63106
AGENDA

ROLL CALL

CONSENT AGENDA

1. Approval of Minutes, Annual Meeting, February 23, 2023

ITEMS FOR INDIVIDUAL CONSIDERATION

2. **Resolution No. 2962**
Authorizing and Approving the Execution of the FY 2023 Community Project Funding Grant Agreement and Related Documents
3. **Resolution No. 2963**
Approving and Authorizing the St. Louis Housing Authority to Submit a Rental Assistance Demonstration (RAD) Application to the U.S. Department of Housing and Urban Development for a RAD Conversion of Public Housing Units at Clinton-Peabody Apartments
4. **Resolution No. 2964**
Authorizing and Approving the Execution of the Capital Fund Program (CFP) Amendment to the Consolidated Annual Contributions Contract and the Capital Fund Annual Statement for Fiscal Year 2023

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

FEBRUARY 23, 2023

BOARD OF COMMISSIONERS
ST. LOUIS HOUSING AUTHORITY
ANNUAL MEETING
FEBRUARY 23, 2023
4:30 p.m.

CALL TO ORDER

The Board of Commissioners of the St. Louis Housing Authority held its Annual Meeting on Thursday, February 23, 2023, via Zoom. Chairman Sal Martinez called the meeting to order at approximately 4:35 p.m.

Present: Annetta Booth
Margaret English
Benita Jones
Sal Martinez
Constantino Ochoa, Jr.

Absent: Regina Fowler
Shelby Watson

CONSENT AGENDA

Election of Officers

Chairman, Vice-Chairman and Treasurer

Commissioner Ochoa moved to reappoint the existing slate of officers; Commissioner Martinez for the position of Chairman, Commissioner Ochoa for the position of Vice-Chairman and Commissioner Fowler for the position of Treasurer. No other motions were made. Commissioner Jones seconded the motion. The motion passed with all commissioners voting aye.

Approval of Minutes

Commissioner Booth moved to approve the minutes of January 26, 2023 as presented. Commissioner Ochoa seconded the motion. The motion passed with all commissioners voting aye.

DIRECTOR'S REPORT

Ms. Green recalled that the St. Louis Housing Authority had received residents' concerns at its meetings for the past few months from a resident at West Pine Apartments. She deferred to Lisa Selligman, Capital Projects Manager, to talk about some of the things that had been going on and what she had been doing to keep control of the matter.

Ms. Selligman stated that since the last meeting SLHA had heard from a resident about issues she had been having with water intrusion and mold in her unit. She noted that Habitat, the management company, had moved the resident out and had started the process of remediation. She also noted that she had inspected the property three times and that the first inspection occurred on February 1, 2023. She said at that time all of the different boards that had been identified as having issues had been removed from the wall and the management company had identified two sources of leaks; one source was a plumbing issue from an upper floor that was leaking down to the second floor, which had been repaired, and the other source was the trap for the sink in the bathroom in the unit was leaking.

Ms. Selligman stated that the plumbing fixture had been removed in order to remove the partition finish board and the remediation contractor had treated the area for mold using standard industry protocol and they were running a high power HEPA filter in the space. She said the remediation contractor also painted the remaining finishes with mold-killing primer, which is standard protocol in these situations. She noted that at that point they had established that the plumbing leaks had been taken care of and

that they would wait for the weather to help them establish if the roof leaks had been dealt with in the repairs that Habitat had done earlier in the year. Ms. Selligman stated that it rained on February 8, 2023 and Habitat sent their maintenance worker to the unit who took a video showing no water coming into the space. She noted that she inspected the unit the next morning and there were no changes to the work that had been done, but there was also no evidence of an active leak in any of the traces from the roof. She said the remediation contractor continued to allow the fans and filters to work in the space.

Ms. Selligman stated that SLHA staff went to the unit after it rained on February 22, 2023 to check everything out. She said the maintenance worker had once again been in the space while it was raining and had not seen any leaks. She noted that SLHA staff also did not see any leaks. She said at that point SLHA staff felt pretty confident in saying that it was safe to close the walls back up.

Ms. Green asked if there were any questions for Ms. Selligman.

Commissioner Booth recalled Ms. Green offering the tenant several options at the last meeting and she asked if the tenant took another apartment with SLHA or did she move out.

Ms. Green stated that the tenant temporarily moved to a new unit and would be returning to the unit.

Ms. Selligman noted that the tenant's belongings are in the unit secured behind a plastic sheeting that is separating the workspace from the rest of the apartment. She also noted that the plastic sheeting is sealed and had been tight every time she had been in the unit.

Jason Hensley, Director of Real Estate Development, asked Ms. Selligman to provide a brief outline of her experience as an architect and her experience with water mitigation and remediation.

Ms. Selligman stated that she is a registered architect in Missouri, Illinois and Arkansas and she has over 20 years of experience in housing. She said, particularly as it relates to this matter, she has a great deal of experience working with fire remediation companies. She noted that one of the things that happens after a fire is that there is almost always mold growth because of the amount of water that is poured into the space. She said these protocols are very familiar to her and everything looked as she expected it to look.

Commissioner Booth thanked Ms. Selligman.

Ms. Green asked if there were any additional questions for Ms. Selligman on this matter.

There were none.

Ms. Green thanked Ms. Selligman for taking charge and being able to provide information on the matter in a clear and concise way, and for looking at the matter and approaching it from the perspective of the resident. She said she appreciated Ms. Selligman for filling the role and taking care of the matter on behalf of SLHA.

Commissioner Martinez thanked Ms. Selligman and noted that it was excellent work.

As Lt. Middleton was not in attendance to present the Housing Authority Unit report, it was noted that his written report had been provided to the commissioners.

Ms. Green stated that this concluded her report.

ADJOURNMENT

Commissioner Booth moved to adjourn the meeting into Executive Session. Commissioner Ochoa seconded the motion. The vote was in favor of passing the motion with all commissioners voting aye. The meeting thereupon adjourned at 4:48 p.m.

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


Alana C. Green, Secretary
Board of Commissioners
St. Louis Housing Authority

(SEAL)

RESOLUTION No. 2962

MEMORANDUM

To: Board of Commissioners

From: Alana C. Green – Executive Director 

Date: March 8, 2023

Subject: Resolution No. 2962
Authorizing and Approving the Execution of the FY 2023 Community Project Funding Grant Agreement and Related Documents

Board approval is requested to authorize the Executive Director to execute and implement the FY 2023 Community Project Funding Grant Agreement. This \$990,000 grant was authorized in the federal Consolidated Appropriations Act of 2023 and the earmark was championed by Congresswoman Cori Bush during the budgetary process.

The FY 2023 Community Project Funding grant will be used exclusively to continue efforts to provide free WiFi to families living in traditional public housing. Specifically, the grant will be used to support the following:

- Capital and Labor Costs: WiFi Equipment and Installation
- Data Charges
- Devices to Families
- Digital Literacy

**AUTHORIZING AND APPROVING THE EXECUTION OF THE FY 2023 COMMUNITY PROJECT FUNDING GRANT
AGREEMENT AND RELATED DOCUMENTS**

WHEREAS, in April 2022, the St. Louis Housing Authority (SLHA) applied for a Community Project Funding earmark through Congresswoman Cori Bush's office; and

WHEREAS, the purpose of the earmark is to fund SLHA's continued efforts to provide free WiFi and devices to families living in traditional public housing developments (WiFi Project); and

WHEREAS, SLHA was notified in December 2022 that the Congressional earmark of \$990,000 was approved in the FY 2023 Consolidated Appropriations Act; and

WHEREAS, on March 2, 2023, SLHA received the Community Project Funding grant agreement with the U.S. Department of Housing and Urban Development for the WiFi project; and

WHEREAS, to be eligible for the earmarked funds, SLHA must execute the grant agreement and submit required documentation.

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

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to execute the Community Project Funding Grant Agreement.
2. The Executive Director of the St. Louis Housing Authority is hereby authorized and directed to take any and all necessary actions to implement the WiFi project.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-1000

OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

March 2, 2023

Alana Green
Executive Director
St. Louis Housing Authority (SLHA)
3520 Page Blvd.
St. Louis, MO 63106
Email: AGreen@slha.org

Dear Green:

In the Consolidated Appropriations Act, 2023 (Public Law 117-328) (the FY2023 Act), Congress made funding available \$2,982,285,641 for “grants for the Economic Development Initiative (EDI) for the purposes, and in amounts, specified for Community Project Funding/Congressionally Directed Spending” in the associated table included in the accompanying joint explanatory statement (JES). These “Community Project Funding” or “CPF” awards are administered by the Department of Housing and Urban Development (HUD).

HUD received the below information about your project as listed on the JES, which was printed in the Senate section of the Congressional Record on December 20, 2022 ([CREC-2022-12-20-pt3-PgS9325-2.pdf \(congress.gov\)](#)). A Grant Number (noted below) has been generated by HUD and will be the unique identifier for your project throughout the grant process.

Grantee:	St. Louis Housing Authority (SLHA)
Project:	Public Wi-Fi for Housing Authority Residents
Amount:	\$990,000
Grant Number	B-23-CP-MO-0893

Pursuant to the requirements associated with the FY2023 Act, this FY2023 Grant Award Letter outlines initial grant award requirements and information needed from you to prepare your FY2023 CPF Grant Agreement for execution. The Grant Award Letter also provides an overview of the steps to execute your Grant Agreement. Further detail is provided within the FY2023 CPF Grant Guide.

This “Grant Award Letter,” is included in the “Grant Award Package” transmitted with the corresponding email. The Grant Award Package also includes:

- the “FY2023 Community Project Funding Grant Guide” (FY2023 CPF Grant Guide),
- your FY2023 Community Project Funding Grant Agreement “FY2023 CPF Grant

- Agreement,” and
- standard forms required to execute your Grant Agreement.

A brief overview of these documents is below:

- 1) **FY2023 CPF Grant Guide:** The FY2023 CPF Grant Guide provides instructions for completing the requested information and filling out the required administrative forms to initiate your FY2023 CPF Grant Agreement. The FY2023 CPF Grant Guide also provides information on the requirements that will govern these funds, as provided by the FY2023 Act, and the cross-cutting requirements that generally apply to all HUD awards as provided by HUD regulations and other applicable Federal regulations and statutes.

The FY2023 CPF Grant Guide provides guidance and instructions for access to your grant funds and fulfilling the reporting requirements for this award. The FY2023 CPF Grant Guide provides guidance for various grant administration-related actions including the Disaster Recovery Grants Reporting (DRGR) system for the financial management of these grant funds and periodic reporting of project status and accomplishments for this grant. Please refer to this document as it includes important information and forms for accessing DRGR, as well as other information concerning reporting requirements.

- 2) **FY2023 CPF Grant Agreement for this Award:** The FY2023 CPF Grant Agreement specifies the applicable statutory provisions, regulations, and administrative requirements for this award. Please read this FY2023 CPF Grant Agreement carefully, including its incorporated appendices, which contain additional mandatory award terms as well as information specific to your award, such as your organization’s indirect cost information. Please make sure all grantee information and award-specific information is entered completely and accurately before signing this Agreement. The grantee’s Authorized Representative, or legal signatory, must sign and date the FY2023 CPF Grant Agreement. Please retain a “copy” (either electronic and/or printed) of the signed and dated document for your records pending receipt of the countersigned copy from HUD. Please also note that to ensure the Project Narrative and Approved Budget (Appendices 1 and 2) reflect the project and budget as approved by HUD at the time of grant execution, Appendices 1 and 2 will be added by HUD on the date that HUD signs the FY2023 CPF Grant Agreement as stated in Article III, sections A and B of the FY2023 CPF Grant Agreement.

- 3) **Standard Forms and Required Materials:**

- a. Form HUD-1044, Assistance Award/Amendment Form (Attached)
- b. Standard Form–424 Application for Federal Assistance:
<https://www.hudexchange.info/resource/306/hud-form-sf424/>
- c. SF-424-B, Assurances for Non construction Programs, or SF-424-D, Assurances for Construction Programs: <https://www.grants.gov/forms/sf-424-family.html>
- d. SFLLL Disclosure of Lobbying Activities (as applicable):
<https://www.hudexchange.info/resource/308/hud-form-sflll/>
- e. SF-1199A - Direct Deposit Sign-Up Form:
<https://www.hud.gov/sites/documents/attachmentvisf1199A.PDF>

Evidence of the American Bankers Association (ABA) number for your depository account, such as a VOIDED blank check, a deposit slip, or similar documentation. The SF1199A form is used to collect the information necessary to establish an account for the grantee in HUD's financial system. The form is to be completed by the grantee and grantee's financial institution.

Grant Award Process Overview

Below is a step-by-step walk-through of the process and necessary documents and forms to execute your FY2023 Grant Agreement. This process and the forms are also available in the FY2023 CPF Grant Guide, which can also be found on the program's webpage at:

https://www.hud.gov/program_offices/comm_planning/edi-grants.

Grant Award Process

- 1) HUD will email a Grant Award Package including:
 - a. FY2023 Grant Award Letter (this letter)
 - b. FY2023 CPF Grant Guide
 - c. FY2023 CPF Grant Agreement
 - d. Links to Standard Forms (see list above in number 3)
- 2) Grantee should review the Grant Award Package documents and send HUD the following:
 - a. Signed and dated FY2023 CPF Grant Agreement
 - b. Completed Standard Forms
 - c. Detailed Project Narrative: The detailed project narrative should:
 - i. capture the maximum anticipated scope of the proposal, not just a single activity that the CPF grant is going toward; and
 - ii. include all contemplated actions that are part of the project.
 - d. Line-Item Project Budget: The line-item budget should:
 - i. capture the maximum anticipated scope of the proposal including the use of the FY23 CPF grant funds in context of the full project budget; and
 - ii. include all contemplated actions that are part of the project, not just a single activity that the CPF grant is going toward.
- 3) Grantee should initiate or complete a Federal environmental review: If the grantee has not yet done so, they should initiate an environmental review, as applicable.
- 4) HUD reviews returned Grant Award Package for completeness: Once HUD receives a completed grant award package, HUD will review the project narrative and budget, standard forms, grantee-signed and dated FY2023 CPF Grant Agreement.
 - a. If complete, HUD will execute the FY2023 CPF Grant Agreement.
 - b. If information is missing, HUD will work with grantee to finalize the Grant Award Package.
- 5) Payment Process: Once the Grant Agreement is executed by the Grantee and HUD, HUD will assist the grantee in getting set up in HUD's financial system. Once set up in HUD's financial system, grantees will submit payment requests.

To assist you with understanding the materials that you have received, HUD will host a series of webinars and "office hours" starting the week of March 6, 2023, to review the

requirements and support grantees through the grant award process and beyond. HUD will send reminder emails prior to each session with the registration link.

Overview of the FY2023 Act

CPF grants are subject to several Federal requirements. HUD will provide additional information and further clarification regarding applicable requirements and the grant award process in upcoming webinars and additional technical assistance. The most essential requirements include:

- **Administrative Requirements:** CPF grants are subject to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR Part 200.
- **Environmental Review Requirements:** CPF grants, like all projects funded by HUD, are subject to requirements under the National Environmental Policy Act (NEPA), HUD’s NEPA-implementing regulations at 24 CFR Part 50 or 24 CFR Part 58, and all appropriate federal environmental and historic preservation laws, regulations, and Executive Orders.
 - In keeping with the National Environmental Policy Act (NEPA) and HUD’s NEPA-implementing regulations at 24 CFR Part 50 or 24 CFR Part 58, **environmental reviews must be completed, and a Request for Release of Funds and Certification must be approved by HUD, as applicable, for all projects prior to taking any ‘choice limiting actions.’¹**
 - Environmental reviews must be completed before a grantee can undertake actions that prevent the grantee from taking an alternative action to minimize or avoid environmental harm, or that would have an adverse environmental impact (“choice limiting actions”). This step is required to avoid violations under 24 CFR 58.22 which provides limitations on activities pending clearance, and Section 110(k) of the National Historic Preservation Act which prohibits anticipatory demolition or significant harm of cultural and/or historic resources prior to completion of the historic preservation review process known as Section 106 review.
 - HUD defines the “Federal Nexus” for a program or project as the event that triggers the requirements for federal environmental review under a host of laws, regulations, and Executive Orders, including the prohibition on choice limiting actions.
- To be eligible, expenses must comply with applicable Federal requirements. This includes administrative requirements under 2 CFR Part 200, environmental laws, statutes and Executive Orders, and other “cross-cutting” federal requirements adhered to by HUD. In addition, environmental reviews are required for all HUD funded programs and project activities. This includes soft costs as well as hard costs.
- For FY2023 grants, the date of the FY 2023 Act’s enactment (December 29, 2022) is the date of eligibility for reimbursement for hard and soft costs and the date of the federal nexus

¹ Choice limiting actions constitute work, such as entering construction contract agreements/commitments and earth-moving activities/clearing/grubbing as well as building renovation/upgrades, that can have an adverse impact on cultural and / or historical resources or the environment, or prevent the avoidance, minimization, or mitigation of those impacts. Examples of ‘choice limiting actions’ include, but are not limited to, purchasing land, entering into contracts for property acquisition or construction, or physical work on the project.

for compliance with all environmental laws. Therefore, reimbursable/eligible hard costs can be incurred after enactment once a full environmental review is completed.

- HUD conducted a nationwide environmental review to clear activities such as administrative, planning, and operations and maintenance costs (including costs to prepare an environmental review).
 - After execution of the FY2023 CPF Grant Agreement, these soft costs may be reimbursed if incurred after December 29, 2022, and the costs would otherwise meet the allowability criteria in 2 CFR 200.403.
 - Hard costs can be reimbursed if incurred after a full environmental review is completed and the costs would otherwise meet the allowability criteria in 2 CFR 200.403.

Further explanation and guidance on choice limiting actions and the environmental review process, including historic preservation review, is included within the FY2023 CPF Grant Guide and on the program's webpage.

All information required for your grant award should be submitted via email to the dedicated mailbox at CPFGrants@hud.gov. In transmitting your information, please copy and paste the bolded information as the subject line of your email: **<Grant Number>: <Grantee Name>: Submission of Required Grant Materials**.

If you, or your staff, have any questions regarding how to complete or submit the required documents or about your grant in general, please feel free to contact Rommel Calderwood , in CGD at CPFGrants@hud.gov. Please note while your grant officer may change over time, we have a team approach to managing your project. Rommel Calderwood is the primary point of contact at HUD for this award and will be available to assist you. Include your grant number and grant name in all email correspondence.

We look forward to working with you on this important project!

Sincerely,



Robin J. Keegan
Deputy Assistant Secretary
Economic Development

ATTACHMENTS:

FY2023 Community Project Funding Grant Guide (Version 1)

FY2023 CPF Grant Agreement

Form HUD-1044 – Assistance Award/Amendment Form

Assistance Award/Amendment		U.S. Department of Housing and Urban Development Office of Administration											
1. Assistance Instrument <input type="checkbox"/> Cooperative Agreement <input checked="" type="checkbox"/> Grant		2. Type of Action <input checked="" type="checkbox"/> Award <input type="checkbox"/> Amendment											
3. Instrument Number B-23-CP-MO-0893	4. Amendment Number	5. Effective Date of this Action	6. Control Number										
7. Name and Address of Recipient St. Louis Housing Authority (SLHA) 3520 Page Blvd. St. Louis, MO 63106 EIN: UEI:		8. HUD Administering Office CPD, Congressional Grants Division 451 7th Street, SW, Rm 7146 Washington, DC 20410-7000											
10. Recipient Project Manager Alana Green		8a. Name of Administrator Rommel Calderwood	8b. Telephone Number Rommel.Calderwood@hud.gov										
11. Assistance Arrangement <input type="checkbox"/> Cost Reimbursement <input type="checkbox"/> Cost Sharing <input checked="" type="checkbox"/> Fixed Price		12. Payment Method <input type="checkbox"/> Treasury Check Reimbursement <input type="checkbox"/> Advance Check <input checked="" type="checkbox"/> Automated Clearinghouse											
13. HUD Payment Office Chief Financial Officer		15. HUD Accounting and Appropriation Data											
14. Assistance Amount		15a. Appropriation Number											
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 60%;">Previous HUD Amount</td><td></td></tr> <tr><td>HUD Amount this Action</td><td style="text-align: right;">\$990,000.00</td></tr> <tr><td>Total HUD Amount</td><td style="text-align: right;">\$990,000.00</td></tr> <tr><td>Recipient Amount</td><td></td></tr> <tr><td>Total Instrument Amount</td><td style="text-align: right;">\$990,000.00</td></tr> </table>		Previous HUD Amount		HUD Amount this Action	\$990,000.00	Total HUD Amount	\$990,000.00	Recipient Amount		Total Instrument Amount	\$990,000.00	15b. Reservation Number EDE 23	
Previous HUD Amount													
HUD Amount this Action	\$990,000.00												
Total HUD Amount	\$990,000.00												
Recipient Amount													
Total Instrument Amount	\$990,000.00												
16. Description Public Wi-Fi for Housing Authority Residents This Award consists of the following items which are appended to and hereby made part of this Award: (A) Cover Page - HUD 1044 (B) Grant Agreement		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 60%;">Amount Previously Obligated</td><td></td></tr> <tr><td>Obligation by this Action</td><td></td></tr> <tr><td>Total Obligation</td><td></td></tr> </table>		Amount Previously Obligated		Obligation by this Action		Total Obligation					
Amount Previously Obligated													
Obligation by this Action													
Total Obligation													
17. <input type="checkbox"/> Recipient is required to sign and return three (3) copies of this document to the HUD Administering Office.		18. <input checked="" type="checkbox"/> Recipient is not required to sign this document.											
19. Recipient (By Name): Alana Green		20. HUD (By Name): Robin J. Keegan											
Signature & Title:	Date:	Signature & Title:	Date:										

Previous Editions are Obsolete

form HUD-1044 (8/90)
Ref. Handbook 2210.17

**FY 2023 COMMUNITY PROJECT FUNDING
GRANT AGREEMENT NO. B-23-CP-MO-0893**

Grantee Name: St. Louis Housing Authority (SLHA)

Grantee Address: 3520 Page Blvd. St. Louis, MO 63106

Grantee's Unique Entity Identifier (UEI):

Grantee's Employer Identification Number (EIN)

Federal Award Identification Number (FAIN) B-23-CP-MO-0893

Assistance Listing Number and Name 14.251 Economic Development Initiative,
Community Project Funding, and Miscellaneous Grants

Period of Performance/Budget Period Start Date Date of grant obligation

Period of Performance/Budget Period End Date August 31, 2031

This Grant Agreement between the Department of Housing and Urban Development (HUD) and St. Louis Housing Authority (SLHA) (the Grantee) is made pursuant to the authority of the Consolidated Appropriations Act, 2023 (Public Law 117-103) and the Explanatory Statement for Division L of that Act, which was printed in the Senate section of the Congressional Record on December 20, 2022 (Explanatory Statement).

In reliance upon and in consideration of the mutual representations and obligations under this Grant Agreement, HUD and the Grantee agree as follows:

ARTICLE I. Definitions

The definitions at 2 CFR 200.1 apply to this Grant Agreement, except where this Grant Agreement specifically states otherwise.

Budget period is defined in 2 CFR 200.1 and begins and ends on the dates specified above for the Period of Performance/Budget Period Start Date and Period of Performance/Budget Period End Date.

Period of Performance is defined in 2 CFR 200.1 and begins and ends on the dates specified above for the Period of Performance/Budget Period Start Date and Period of Performance/Budget Period End Date.

ARTICLE II. Total Grant Amount

Subject to the provisions of the Grant Agreement, HUD will make grant funds in the amount of \$990,000 available to the Grantee.

ARTICLE III. Award-Specific Requirements

A. Federal Award Description. The Grantee must use the Federal funds provided under this Grant Agreement (Grant Funds) to carry out the Grantee's "Project." Unless changed in accordance with Article III, section C of this Grant Agreement, the Grantee's Project shall be as described in the Project Narrative that is approved by HUD as of the date that HUD signs this Grant Agreement. For reference, HUD will attach this approved Project Narrative as Appendix 1 to the Grant Agreement on the date that HUD signs this Grant Agreement.

B. Approved Budget. The Grantee must use the Grant Funds as provided by the Approved Budget. Unless changed in accordance with Article III, section C of this Grant Agreement, the Approved Budget shall be the line-item budget that is approved by HUD as of the date that HUD signs this Grant Agreement. For reference, HUD will attach this approved line-item budget as Appendix 2 to this Grant Agreement on the date that HUD signs this Grant Agreement.

C. Project and Budget Changes. All changes to the Grantee's Project or Approved Budget must be made in accordance with 2 CFR 200.308 and this Grant Agreement. To request HUD's approval for a change in the Project or Approved Budget, the Grantee must submit a formal letter to the Director of HUD's Office of Economic Development - Congressional Grants Division through the assigned Grant Officer. The letter must be submitted by email to the assigned Grant Officer and must provide justification for the change. The email submitting the letter must also include a revised project narrative or revised line-item budget, as applicable, that includes the requested change. The Grantee is prohibited from making project or budget changes that would conflict with the Applicable Appropriations Act Conditions described in Article III, section D of this Grant Agreement. The assigned Grant Officer for this grant is provided in the Award Letter for this grant and found on HUD's website. The HUD Office of Economic Development – Congressional Grants Division will notify the Grantee in writing, by email, whether HUD approves or disapproves the change. Before the Grantee expends Grant Funds in accordance with any change approved by HUD or otherwise allowed by 2 CFR 200.308, the Grantee must update its grant information in Disaster Recovery Grant Reporting (DRGR) to reflect that change.

D. Applicable Appropriations Act Conditions. The conditions that apply to the Grant Funds as provided by the Consolidated Appropriations Act, 2023 and the Explanatory Statement are hereby incorporated and made part of this Grant Agreement. In the event of a conflict between those conditions, the conditions provided by the Act will govern. The Grant Funds are not subject to the Community Development Block Grants regulations at 24 CFR part 570 or Title I of the Housing and Community Development Act of 1974.

E. In accordance with 2 CFR 200.307(b), costs incidental to the generation of program income may be deducted from gross income to determine program income, provided these costs have not been charged to the grant. As authorized under 2 CFR 200.307(e)(2), program income may be treated as an addition to the Federal award, provided that the Grantee uses that income for allowable costs under this Grant Agreement. In accordance with 2 CFR 200.307(b), costs incidental to the generation of program income may be deducted from gross income to determine program income, provided these costs have not been charged to the grant. Any program income that cannot be expended on allowable costs under this Grant Agreement must be paid to HUD before closeout of the grant, unless otherwise specified by an applicable Federal statute.

F. The Grantee must use the Grant Funds only for costs (including indirect costs) that meet the applicable requirements in 2 CFR part 200 (including appendices). The Grantee's indirect cost rate information is as provided in Appendix 3 to this Grant Agreement. Unless the Grantee is an Institution of Higher Education, the Grantee must immediately notify HUD upon any change in the Grantee's indirect cost rate during the Period of Performance, so that HUD can amend the Grant Agreement to reflect the change if necessary. Consistent with 2 CFR Part 200, Appendix III (C.7), if the Grantee is an Institution of Higher Education and has a negotiated rate in effect on the date this Grant Agreement is signed by HUD, the Grantee may use only that rate for its indirect costs during the Period of Performance.

G. The Grantee must comply with any specific award conditions that HUD may attach to this Grant Agreement as provided by 2 CFR 200.208. If applicable, these conditions will be listed or added as Appendix 5 to this Grant Agreement.

H. The Grantee is responsible for managing the Project and ensuring the proper use of the Grant Funds. The Grantee is also responsible for ensuring the completion of the Project, the grant closeout, and compliance with all applicable federal requirements. The Grantee may subaward all or a portion of its funds to one or more subrecipients, as identified in the Project Narrative (Appendix 1) or as may be approved by HUD in accordance with 2 CFR 200.308. All subawards made with funding under this Grant Agreement are subject to the subaward requirements under 2 CFR Part 200, including 2 CFR 200.332, and other requirements provided by this Grant Agreement. The Grantee is responsible for ensuring each subrecipient complies with all requirements under this Grant Agreement, including the general federal requirements in Article IV. A subaward may be made to a for-profit entity only if HUD expressly approves that subaward and the for-profit entity is made subject to the same Federal requirements that apply to all other subrecipients, including the requirements 2 CFR part 200 provides for a "non-Federal entity" that receives a subaward.

ARTICLE IV. General Federal Requirements

A. If the Grantee is a unit of general local government, a State, an Indian Tribe, or an Alaskan Native Village, the Grantee is the Responsible Entity (as defined in 24 CFR part 58) and agrees to assume all of the responsibilities for environmental review and decision-making and action, as specified and required in regulations issued by the Secretary pursuant to section 305(c) of the Multifamily Housing Property Disposition Reform Act of 1994 and published in 24 CFR Part 58.

B. If the Grantee is a housing authority, redevelopment agency, academic institution, hospital or other non-profit organization, the Grantee shall request the unit of general local government, Indian Tribe or Alaskan Native Village, within which the Project is located and which exercises land use responsibility, to act as Responsible Entity and assume all of the responsibilities for environmental review and decision-making and action as specified in paragraph A above, and the Grantee shall carry out all of the responsibilities of a grantee under 24 CFR Part 58.

C. After December 29, 2022, neither the Grantee nor any of its contractors, subrecipients and other funding and development partners may undertake, or commit or expend Grant Funds or local funds for, project activities (other than for planning, management, development and administration activities), unless a contract requiring those activities was already executed on or before December 29, 2022, until one of the following occurs: (i) the Responsible Entity has completed the environmental review procedures required by 24 CFR part 58, and HUD has approved the environmental certification and given a release of funds; (ii) the Responsible Entity has determined and documented in its environmental review record that the activities are exempt under 24 CFR 58.34 or are categorically excluded and not subject to compliance with environmental laws under 24 CFR 58.35(b); or (iii) HUD has performed an environmental review under 24 CFR part 50 and has notified Grantee in writing of environmental approval of the activities.

D. Following completion of the environmental review process, the Grantee (recipient) shall exercise oversight, monitoring, and enforcement as necessary to assure that decisions and mitigation measures adopted through the environmental review process are carried out during project development and implementation.

E. The Grantee must comply with the generally applicable HUD and CPD requirements in 24 CFR Part 5, subpart A, including all applicable fair housing, and civil rights requirements. If the Grantee is a Tribe or a Tribally Designated Housing Entity (TDHE) as established under 24 CFR 1000.206, the Grantee must comply with the nondiscrimination requirements in 24 CFR 1000.12 in lieu of the nondiscrimination requirements in 24 CFR 5.105(a). The Grantee must report data on the race, color, religion, sex, national origin, age, disability, and family characteristics of persons and households who are applicants for, participants in, or beneficiaries or potential beneficiaries of the Grantee's Project, consistent with the instructions and forms provided by HUD in order to carry out its responsibilities under the Fair Housing Act, Executive Order 11063, Title VI of the Civil Rights Act of 1964, and Section 562 of the Housing and Community Development Act of 1987 (e.g. HUD-27061).

F. The Grantee must comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements in 2 CFR part 200, as may be amended from time to time. If 2 CFR part 200 is amended to replace or renumber sections of part 200 that are cited specifically in this Grant Agreement, the part 200 requirements as renumbered or replaced by the amendments will govern the obligations of HUD and the Grantee after those amendments become effective.

G. The Grantee must comply with the Award Term in Appendix A to 2 CFR Part 25 ("System for Award Management and Universal Identifier Requirements") and the Award Term in Appendix A to 2 CFR Part 170 ("Reporting Subawards and Executive Compensation"), which are hereby incorporated into and made part of this Grant Agreement.

H. If the Total Grant Amount, as provided in Article II of this Grant Agreement, is greater than \$500,000, the Grantee must comply with the Award Term and Condition for Grantee Integrity and Performance Matters in Appendix 4 to this Grant Agreement.

I. Unless the Grantee is exempt from the Byrd Amendment as explained below, the Grantee must comply with the provisions of Section 319 of Public Law 101-121, 31 U.S.C. 1352, (the Byrd Amendment) and 24 CFR Part 87, which prohibit recipients of Federal contracts, grants, or loans from using appropriated funds for lobbying the executive or legislative branches of the Federal Government in connection with a specific contract, grant, loan, or cooperative agreement. The Grantee must include in its award documents for all sub-awards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements), the requirements for the certification required by Appendix A to 24 CFR Part 87 and for disclosure using Standard Form- LLL (SF-LLL), "Disclosure of Lobbying Activities." In addition, the Grantee must obtain the executed certification required by Appendix A and an SF-LLL from all covered persons. "Person" is as defined by 24 CFR Part 87. Federally recognized Indian tribes and TDHEs established by Federally recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage of the Byrd Amendment. State-recognized Indian tribes and TDHEs established only under state law must comply with this requirement.

J. The Grantee must comply with drug-free workplace requirements in Subpart B of 2 CFR Part 2429, which adopts the governmentwide implementation (2 CFR Part 182) of sections 5152-5158 of the Drug-Free Workplace Act of 1988, Pub. L. 100-690, Title V, Subtitle D (41 U.S.C. 701-707).

K. The Grantee must comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as implemented by regulations at 49 CFR Part 24. The URA applies to acquisitions of real property and relocation occurring as a direct result of the acquisition, rehabilitation, or demolition of real property for Federal or Federally funded programs or projects. Real property acquisition that receives Federal financial assistance for a program or project, as defined in 49 CFR 24.2, must comply with the acquisition requirements contained in 49 CFR part 24, subpart B. Unless otherwise specified in law, the relocation requirements of the URA and its implementing regulations at 49 CFR part 24, cover any displaced person who moves from real property or moves personal property from real property as a direct result of acquisition, rehabilitation, or demolition for a program or project receiving HUD financial assistance

L. If Grant Funds are used for purchase, lease, support services, operation, or work that may disturb painted surfaces, of pre-1978 housing, you must comply with the lead-based paint evaluation and hazard reduction requirements of HUD's lead- based paint rules (Lead Disclosure; and Lead Safe Housing (24 CFR part 35)), and EPA's lead- based paint rules (e.g., Repair, Renovation and Painting; Pre-Renovation Education; and Lead Training and Certification (40 CFR part 745)).

M. The Grantee must comply with Section 3 of the Housing and Urban Development Act of 1968 (Section 3), 12 U.S.C. 1701u, and HUD's regulations at 24 CFR part 75, as applicable, including the reporting requirements in 24 CFR 75.25. Grants made to Tribes and TDHEs are subject to Indian Preference requirements in Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 5307(b)). As stated in 24 CFR 75.3(c), grants to Tribes and TDHEs are subject to Indian Preference requirements in lieu of Section 3. Grantees that are not exempt from Section 3 must submit annual reports of Section 3

accomplishment Performance Measures in DRGR in January of the calendar year. This report reflects Section 3 accomplishments for the previous calendar year.

N. The Grantee must not use any Grant Funds to support any Federal, state, or local project that seeks to use the power of eminent domain, unless eminent domain is employed only for a public use. Public use includes use of funds for mass transit, railroad, airport, seaport, or highway projects, and utility projects which benefit or serve the general public (including energy-related, communication-related, water-related, and waste water-related infrastructure), other structures designated for use by the general public or with other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields, as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107-118). Public use does not include economic development that primarily benefits private entities.

O. The Grantee must not use any Grant Funds to maintain or establish a computer network that does not block the viewing, downloading, and exchanging of pornography. This requirement does not limit the use of funds necessary for any Federal, State, tribal, or local law enforcement agency or any other entity carrying out criminal investigations, prosecution, or adjudication activities.

P. The Grantee must administer its Grant Funds in accordance with the Conflict of Interest requirements set forth in Appendix 6 of this Grant Agreement.

Q. The Grantee must comply with the governmentwide debarment and suspension requirements in 2 CFR part 180 as incorporated and supplemented by HUD's regulations at 2 CFR part 2424.

R. The Grantee must comply with the award term and condition regarding trafficking in persons in Appendix 7 of this Grant Agreement.

S. The assurances and certifications the Grantee has made and submitted to HUD are incorporated by this reference and made part of this Grant Agreement.

ARTICLE V. Drawdown Requirements

A. The Grantee may not draw down Grant Funds until HUD has received and approved any certifications and disclosures required by 24 CFR 87.100 concerning lobbying, if applicable.

B. The Grantee must use HUD's Disaster Recovery Grant Reporting (DRGR) system to draw down Grant Funds and report to HUD on activities.

C. The Grantee must enter activity and budget information in DRGR that is consistent with the Grantee's Project and Approved Budget as described in Article III, sections A and B of this Grant Agreement and complies with HUD's instructions for entering information in DRGR found in the document titled "Grant Award Instructions" that accompanies the Grant Agreement.

D. The Grantee must only enter activities in DRGR that are described in the Approved Budget.

E. The Grantee must expend all Grant Funds in accordance with the activity and budget information in DRGR.

F. Each drawdown of Grant Funds constitutes a representation by the Grantee that the funds will be used in accordance with this Grant Agreement.

G. The Grantee must use DRGR to track the use of program income and must report the receipt and use of program income in the reports the Grantee submits to HUD under Article VI of this Grant Agreement. The Grantee must expend program income before drawing down Grant Funds through DRGR.

H. Notwithstanding any other provision of this grant agreement, HUD will not be responsible for payment of any Grant Funds after the date Treasury closes the account in accordance with 31 U.S.C. § 1552. Because Treasury may close the account up to one week before the September 30 date specified by 31 U.S.C. § 1552, the Grantee is advised to make its final request for payment under the grant no later than September 15, 2031.

ARTICLE VI. Program-Specific Reporting Requirements

In addition to the general reporting requirements that apply under other provisions of this Agreement, the following program-specific reporting requirements apply to the Grantee:

A. The Grantee must submit a performance report in DRGR on a semi-annual basis and must include a completed Federal financial report as an attachment to each performance report in DRGR. Performance reports shall consist of a narrative of work accomplished during the reporting period. During the Period of Performance, the Grantee must submit these reports in DRGR no later than 30 calendar days after the end of the 6-month reporting period. The first of these reporting periods begins on the first of January or June (whichever occurs first) after the date this Grant Agreement is signed by HUD.

B. The performance report must contain the information required for reporting program performance under 2 CFR 200.329(c)(2) and (d), including a comparison of actual accomplishments to the objectives of the Project as described in Article III, section A of this Grant Agreement, the reasons why established goals were not met, if appropriate, and additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

C. Financial reports must be submitted using DRGR or such future collections HUD may require and as approved by OMB and listed on the Grants.gov website (<https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>).

D. The performance and financial reports will undergo review and approval by HUD. If a report submission is insufficient, HUD will reject the report in DRGR and identify the corrections the Grantee must make.

E. No drawdown of funds will be allowed through DRGR while the Grantee has an overdue performance or financial report.

F. The Grantee must report and account for all property acquired or improved with Grant Funds as provided by 2 CFR part 200 using the applicable common forms approved by OMB and provided on the Grants.gov website (<https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>). This reporting obligation includes submitting status reports on real property at least annually as provided by 2 CFR 200.330, accounting for real and personal property acquired or improved with Grant Funds as part of Project Closeout, and promptly submitting requests for disposition instructions as provided by 2 CFR 200.311(c), 200.313(e), and 200.314(a).

ARTICLE VII. Project Closeout

A. The grant will be closed out in accordance with 2 CFR part 200, as may be amended from time to time, except as otherwise specified in this Grant Agreement.

B. The Grantee must submit to HUD a written request to closeout the grant no later than 30 calendar days after the Grantee has drawn down all Grant Funds and completed the Project as described in Article III, section A of this Grant Agreement. HUD will then send the Closeout Agreement and Closeout Certification to the Grantee.

C. At HUD's option, the Grantee may delay initiation of project closeout until the resolution of any findings as a result of the review of semi-annual activity reports in DRGR. If HUD exercises this option, the Grantee must promptly resolve the findings.

D. The Grantee recognizes that the closeout process may entail a review by HUD to determine compliance with the Grant Agreement by the Grantee and all participating parties. The Grantee agrees to cooperate with any HUD review, including reasonable requests for on-site inspection of property acquired or improved with Grant Funds.

E. No later than 120 calendar days after the Period of Performance, Grantees shall provide to HUD the following documentation:

1. A Certification of Project Completion.
2. A Grant Closeout Agreement.
3. A final financial report giving the amount and types of project costs charged to the grant (that meet the allowability and allocability

requirements of 2 CFR part 200, subpart E); a certification of the costs; and the amounts and sources of other project funds.

4. A final performance report providing a comparison of actual accomplishments with the objectives of the Project, the reasons for slippage if established objectives were not met and additional pertinent information including explanation of significant cost overruns.
5. A final property report, if specifically requested by HUD at the time of closeout.

ARTICLE VIII. Default

A default under this Grant Agreement shall consist of any use of Grant Funds for a purpose other than as authorized by this Grant Agreement, any noncompliance with statutory, regulatory, or other requirements applicable to the Grant Funds, any other material breach of this Grant Agreement, or any material misrepresentation in the Grantee's submissions to HUD in anticipation of this award. If the Grantee fails to comply with the terms and conditions of the Grant Agreement, HUD may adjust specific conditions of this Grant Agreement as described in 2 CFR part 200, as may be amended from time to time. If HUD determines that noncompliance cannot be remedied by imposing additional conditions, HUD may take one or more of the remedies for noncompliance described in 2 CFR part 200, as may be amended from time to time. HUD may also terminate all or a part of this award as provided by 2 CFR 200.340 and other applicable provisions of 2 CFR part 200, as may be amended from time to time. Nothing in this Grant Agreement shall be construed as creating or justifying any claim against the Federal government or the Grantee by any third party.

ARTICLE IX. HUD Contact Information

Except where this Grant Agreement specifically states otherwise, all requests, submissions, and reports the Grantee is required to make to HUD under this Grant Agreement must be made in writing via email to CPFGGrants@hud.gov.

This agreement is hereby executed on behalf of the Grantee and HUD as follows:

GRANTEE

(Name of Organization)

BY:

 (Signature of Authorized Official)

 (Typed Name and Title of Authorized Official)

 (Date)

HUD

BY:

 Robin J. Keegan,
Deputy Assistant Secretary for Economic Development

 (Date)

APPENDIX 1 – Project Narrative

APPENDIX 2 – Approved Budget

APPENDIX 3 – Grantee’s Indirect Cost Rate Information

Subject to the applicable requirements in 2 CFR part 200 (including its appendices), the Grantee will use an indirect cost rate as represented by the Grantee below:

- ☐ The Grantee will not use an indirect cost rate to charge its indirect costs to the grant.
- ☐ The Grantee will use the indirect cost rate(s) identified in the table below to charge its indirect costs to the grant.

Agency/Dept./Major Function	Indirect cost rate	Direct Cost Base
_____	_____ %	_____
_____	_____ %	_____

[PLEASE NOTE: The grantee must check one of the two boxes above. If the second box is checked, the corresponding table must be filled out as described below.

The table must include each indirect cost rate that will be used to calculate the Grantee’s indirect costs under the grant. The table must also specify the type of direct cost base to which each included rate applies (for example, Modified Total Direct Costs (MTDC)). Do not include indirect cost rate information for subrecipients.

For government entities, enter each agency or department that will carry out activities under the grant, the indirect cost rate applicable to each department/agency (including if the de minimis rate is used per 2 CFR 200.414), and the type of direct cost base to which the rate will be applied.

For nonprofit organizations that use the Simplified Allocation Method for indirect costs or elects to use the de minimis rate of 10% of Modified Total Direct Costs in accordance with 2 CFR 200.414, enter the applicable indirect cost rate and type of direct cost base in the first row of the table.

For nonprofit organizations that use the Multiple Allocation Base Method, enter each major function of the organization for which a rate was developed and will be used under the grant, the indirect cost rate applicable to that major function, and the type of direct cost base to which the rate will be applied.]

APPENDIX 4 – Award Term and Condition for Grantee Integrity and Performance Matters

Reporting of Matters Related to Grantee Integrity and Performance

1. General Reporting Requirement

If the total value of the Grantee's currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then during that period of time the Grantee must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in paragraph 2 of this award term and condition. This is a statutory requirement under section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.

2. Proceedings About Which Grantee Must Report

During any period of time when the Grantee is subject to the requirement in paragraph 1 of this award term and condition, the Grantee must submit the information required about each proceeding that:

- a. Is in connection with the award or performance of a grant, cooperative agreement, or procurement contract from the Federal Government;
- b. Reached its final disposition during the most recent five-year period; and
- c. Is one of the following:
 - (1) A criminal proceeding that resulted in a conviction, as defined in paragraph 5 of this award term and condition;
 - (2) A civil proceeding that resulted in a finding of fault and liability and payment of a monetary fine, penalty, reimbursement, restitution, or damages of \$5,000 or more;
 - (3) An administrative proceeding, as defined in paragraph 5. of this award term and condition, that resulted in a finding of fault and liability and the Grantee's payment of either a monetary fine or penalty of \$5,000 or more or reimbursement, restitution, or damages in excess of \$100,000; or
 - (4) Any other criminal, civil, or administrative proceeding if:
 - (i) It could have led to an outcome described in paragraph 2.c.(1), (2), or (3) of this award term and condition;

- (ii) It had a different disposition arrived at by consent or compromise with an acknowledgment of fault on the Grantee's part; and
- (iii) The requirement in this award term and condition to disclose information about the proceeding does not conflict with applicable laws and regulations.

3. Reporting Procedures

During any period of time when the Grantee is subject to the requirement in paragraph 1 of this award term and condition, the Grantee must enter in the SAM Entity Management area the information that SAM requires about each proceeding described in paragraph 2 of this award term and condition. The Grantee does not need to submit the information a second time under assistance awards that the Grantee received if the Grantee already provided the information through SAM because the Grantee was required to do so under Federal procurement contracts that the Grantee was awarded.

4. Reporting Frequency

During any period of time when the Grantee is subject to the requirement in paragraph 1 of this award term and condition, the Grantee must report proceedings information through SAM for the most recent five-year period, either to report new information about any proceeding(s) that the Grantee has not reported previously or affirm that there is no new information to report. If the Grantee has Federal contract, grant, and cooperative agreement awards with a cumulative total value greater than \$10,000,000, the Grantee must disclose semiannually any information about the criminal, civil, and administrative proceedings.

5. Definitions

For purposes of this award term and condition:

a. Administrative proceeding means a non-judicial process that is adjudicatory in nature in order to make a determination of fault or liability (e.g., Securities and Exchange Commission Administrative proceedings, Civilian Board of Contract Appeals proceedings, and Armed Services Board of Contract Appeals proceedings). This includes proceedings at the Federal and State level but only in connection with performance of a Federal contract or grant. It does not include audits, site visits, corrective plans, or inspection of deliverables.

b. Conviction, for purposes of this award term and condition, means a judgment or conviction of a criminal offense by any court of competent jurisdiction, whether entered upon a verdict or a plea, and includes a conviction entered upon a plea of nolo contendere.

c. Total value of currently active grants, cooperative agreements, and procurement contracts includes—

- (1) Only the Federal share of the funding under any Federal award with a cost share or match requirement; and

- (2) The value of all expected funding increments under a Federal award and options, even if not yet exercised.

APPENDIX 5 – Specific Award Conditions
NONE.

APPENDIX 6 – Conflict of Interest Requirements

1. *Conflicts Subject to Procurement Regulations.* When procuring property or services, the grantee and its subrecipients shall comply with the applicable conflict-of-interest rules in 2 CFR 200.317 and 2 CFR 200.318(c). In all cases not governed by 2 CFR 200.317 and 2 CFR 200.318(c), the Grantee and its subrecipients must follow the requirements contained in paragraphs 2-5 below.

2. *General prohibition.* No person who is an employee, agent, consultant, officer, or elected or appointed official of the Grantee or subrecipient and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have a financial interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or for one year thereafter. Immediate family ties include (whether by blood, marriage or adoption) the spouse, parent (including a stepparent), child (including a stepchild), sibling (including a stepsibling), grandparent, grandchild, and in-laws of a covered person.

3. *Exceptions.* HUD may grant an exception to the general prohibition in paragraph (ii) upon the Grantee's written request and satisfaction of the threshold requirements in paragraph (iv), if HUD determines the exception will further the Federal purpose of the award and the effective and efficient administration of the Grantee's Project, taking into account the cumulative effects of the factors in paragraph (v).

4. *Threshold requirements for exceptions.* HUD will consider an exception only after the Grantee has provided the following documentation:

- a. A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how that disclosure was made; and
- b. An opinion of the Grantee's attorney that the interest for which the exception is sought would not violate state or local law.

5. *Factors to be considered for exceptions.* In determining whether to grant a requested exception after the Grantee has satisfactorily met the threshold requirements in paragraph (iii), HUD will consider the cumulative effect of the following factors, where applicable:

- a. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;
- b. Whether an opportunity was provided for open competitive bidding or negotiation;
- c. Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception

will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

d. Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process regarding the assisted activity in question;

e. Whether the interest or benefit was present before the affected person was in a position as described in paragraph (ii);

f. Whether undue hardship will result either to the Grantee or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and

g. Any other relevant considerations.

6. *Disclosure of potential conflicts of interest.* The Grantee must disclose in writing to HUD any potential conflict of interest.

APPENDIX 7 – Award Term and Condition Regarding Trafficking in Persons

The following award term and condition, which is required by 2 CFR part 175, applies as written:

a. Provisions applicable to a grantee that is a private entity.

1. You as the grantee, your employees, subrecipients under this award, and subrecipients' employees may not—
 - i. Engage in severe forms of trafficking in persons during the period of time that the award is in effect;
 - ii. Procure a commercial sex act during the period of time that the award is in effect; or
 - iii. Use forced labor in the performance of the award or subawards under the award.
2. We as the Federal awarding agency may unilaterally terminate this award, without penalty, if you or a subrecipient that is a private entity:
 - i. Is determined to have violated a prohibition in paragraph a.1 of this award term; or
 - ii. Has an employee who is determined by the agency official authorized to terminate the award to have violated a prohibition in paragraph a.1 of this award term through conduct that is either—

A. Associated with performance under this award; or

B. Imputed to you or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR Part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by HUD at 2 CFR 2424.

b. Provision applicable to a grantee other than a private entity.

We as the Federal awarding agency may unilaterally terminate this award, without penalty, if a subrecipient that is a private entity—

1. Is determined to have violated an applicable prohibition in paragraph a.1 of this award term; or
2. Has an employee who is determined by the agency official authorized to terminate the award to have violated an applicable prohibition in paragraph a.1 of this award term through conduct that is either:

- i. Associated with performance under this award; or
- ii. Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 2 CFR part 180, “OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement),” as implemented by HUD at 2 CFR 2424.

c. Provisions applicable to any grantee.

1. You must inform us immediately of any information you receive from any source alleging a violation of a prohibition in paragraph a.1 of this award term.
2. Our right to terminate unilaterally that is described in paragraph a.2 or b of this section:
 - i. Implements section 106(g) of the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7104(g)), and
 - ii. Is in addition to all other remedies for noncompliance that are available to us under this award.
3. You must include the requirements of paragraph a.1 of this award term in any subaward you make to a private entity.

d. Definitions. For purposes of this award term:

1. “Employee” means either:
 - i. An individual employed by you or a subrecipient who is engaged in the performance of the project or program under this award; or
 - ii. Another person engaged in the performance of the project or program under this award and not compensated by you including, but not limited to, a volunteer or individual whose services are contributed by a third party as an in-kind contribution toward cost sharing or matching requirements.
2. “Forced labor” means labor obtained by any of the following methods: the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

3. “Private entity”:

i. Means any entity other than a State, local government, Indian tribe, or foreign public entity, as those terms are defined in 2 CFR 175.25.

ii. Includes:

A. A nonprofit organization, including any nonprofit institution of higher education, hospital, or tribal organization other than one included in the definition of Indian tribe at 2 CFR 175.25(b).


B. A for-profit organization.

4. “Severe forms of trafficking in persons,” “commercial sex act,” and “coercion” have the meanings given at section 103 of the TVPA, as amended (22 U.S.C. 7102).

RESOLUTION No. 2963

MEMORANDUM

To: Board of Commissioners

Through: Alana C. Green, Executive Director 

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

Date: March 8, 2023

Subject: Resolution No. 2963
Approving and Authorizing the St. Louis Housing Authority to submit a Rental Assistance Demonstration (RAD) Application to the U.S. Department of Housing and Urban Development for a RAD Conversion of Public Housing Units at Clinton-Peabody Apartments (AMP #MO001000002)

The St. Louis Housing Authority (SLHA) is seeking Board support and approval to submit a Rental Assistance Demonstration (RAD) application to HUD for the conversion of Public Housing Units to the RAD Section 8 platform at Clinton-Peabody Apartments (AMP #MO001000002). This proposed change in funding source from the U.S. Department of Housing and Urban Development (HUD) will allow more flexibility in seeking limited available funding sources, a more predictable funding stream for the redeveloped units, provide access to private funding to redevelop the units, and support the redevelopment through the availability of Replacement Housing Factor (RHF) funds from SLHA.

Rental Assistance Demonstration (RAD) – The RAD program was approved by Congress in 2012 as a way to encourage Public Housing Authorities (PHAs) to use a new funding source to meet the large and growing capital improvement needs of the nation’s aging public housing stock. The program works by converting the public housing assistance, or Annual Contributions Contract (ACC), to long-term Section 8 HAP contracts.

HUD is encouraging PHAs to utilize RAD to insulate subsidized housing units from Federal funding decisions impacting public housing. Nationally there is a \$70 billion backlog of construction and modernization projects needed for public housing as a result of years of congressional underfunding of the ACC, or Capital Fund. SLHA itself has a \$200 million capital improvements need for modernization projects over the next ten (10) years and is expected to get less than a quarter of that amount over the next ten (10) years for Capital Improvement projects.

Asset Repositioning Report – On January 19, 2023, the SLHA board received a Draft Asset Repositioning Report presentation that was the result of strategic planning by SLHA and a year of evaluation and data collection. HUD provided funding for the report as part of its commitment

to encourage PHAs to evaluate their portfolios and seek ways to fund an underfunded capital need in other ways. RAD is a key component of that asset repositioning strategy.

RAD Conversion –The conversion of units from ACC to RAD provides a more reliable funding source of subsidy that allows PHAs and developers to safely leverage private capital to finance property rehabilitation or replacement. Conversion to RAD through long-term Section 8 contracts ensures that the units are perpetually affordable through the requirement that the contracts be renewed and Use Agreements that preserve HUD’s interest in the property. The RAD funding source is stable, it receives a cost-of-living increase on an annual basis (OCAF), and it is kept from the uncertainty of annual Federal funding decisions.

Clinton-Peabody Apartments – Built in 1942, Clinton-Peabody Apartments is the oldest public housing development in the SLHA portfolio. It consists of 358 public housing units in 31 buildings and sits on 23.37 acres near the south side of downtown St. Louis in the Peabody-Darst-Webbe neighborhood.

SLHA has recognized that Clinton-Peabody Apartments requires a full redevelopment and issued a Request for Qualifications in 2022 seeking a full-service developer. This redevelopment process is expected to take five (5) to ten (10) years to complete, and the expected developments would be done in three (3) to five (5) phases.

Redevelopment Process – SLHA issued a Request for Qualifications (RFQ) seeking a “master developer” for the redevelopment of the Clinton-Peabody Apartments. On April 19, 2023, SLHA received seven (7) proposals from developers across the country in response to the RFQ. After a series of in-person presentations, a selection committee comprised of residents, community stakeholders, SLHA board members and staff, selected Preservation of Affordable Housing (POAH) to be the master developer. SLHA and POAH entered into a Designated Developer agreement on November 22, 2022.

POAH has begun the community engagement process and attended the SLHA Fall Festival at the Al Chappelle Community Center in Fall 2022 to introduce themselves to residents. Since then, POAH held its first resident engagement meeting on February 2, 2023, which had an attendance of approximately 40 residents.

During that meeting, POAH was able to explain the planning process, describe how the realities of available financing affect choices, and receive feedback from residents on how they envision their future community. The next community engagement meeting will be held on March 15, 2023.

Replacement Housing Factor (RHF) Funds – SLHA has three (3) years of RHF funds, about \$5 million, available to support and jumpstart the redevelopment of Clinton-Peabody. RHF funds are specifically mentioned as a valid funding source in RAD Notice H-2019-09 PIH-2019-23 (HA).

However, in order to utilize these funds, SLHA must submit a RAD application to HUD and receive a “Commitment to Enter into a Housing Assistance Payments (sic)” (CHAP), which would allow SLHA to begin the RAD process.

When the CHAP is received, SLHA can then request from its local field office the authority to use RHF funds at Clinton-Peabody Apartments. Any CHAP received from HUD does not require SLHA to move forward with the RAD conversion nor does it require any development to happen. It simply reserves the number of units available for RAD conversion and allows SLHA to spend funds on pre-development activities.

RAD Request – SLHA would make this RAD request to HUD for all 358 units at Clinton-Peabody Apartments. As mentioned earlier, phasing will be required for the redevelopment. It is possible that RAD could be used in each phase of the redevelopment, but it could be that RAD is only used in one phase. The purpose of this request is to get a CHAP, which will reserve the units and authorize utilization of SLHA's RHF funds to support the redevelopment of Clinton-Peabody Apartments.

Support for the St. Louis Housing Authority – Approving and Authorizing the St. Louis Housing Authority to Submit a Rental Assistance Demonstration (RAD) Application to the U.S. Department of Housing and Urban Development for a RAD Conversion of Public Housing Units at Clinton-Peabody Apartments (AMP #MO001000002)

WHEREAS, the Clinton-Peabody Apartments development is in need of redevelopment; and

WHEREAS, the United States Department of Housing and Urban Development (HUD) created a Rental Assistance Demonstration program to preserve and improve affordable housing and to address the \$26 billion nationwide backlog of deferred maintenance on public housing developments; and

WHEREAS, it is a goal of the St. Louis Housing Authority (SLHA) to “reposition, redevelop, and create new SLHA properties” within in the SLHA Strategic Plan 2020-2024; and

WHEREAS, the SLHA Agency Plan FY2022, Section B.2 – New Activities, Item number B.2(d) states that SLHA will pursue the conversion of Public Housing to Tenant-Based or Project-Based Housing Assistance Payments Contracts under a RAD conversion; and

WHEREAS, SLHA must obligate and expend accumulated Replacement Housing Factor funds before the statutory deadline in August 2023; and

WHEREAS, SLHA, through a committee of residents, community stakeholders, SLHA board members and staff, selected Preservation of Affordable Housing (POAH) as its Designated Developer for Clinton-Peabody Apartments; and

WHEREAS, POAH has begun the community engagement and planning process for the redevelopment of Clinton-Peabody Apartments; and

WHEREAS, SLHA is committed to supporting the redevelopment of Clinton-Peabody Apartments through every available means.

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

1. The Board of Commissioners authorizes the Executive Director to submit a Rental Assistance Demonstration (RAD) application to the U.S. Department of Housing and Urban Development for a RAD Conversion of the Public Housing Units at Clinton-Peabody Apartments (AMP #MO001000002).
2. The Executive Director of the St. Louis Housing Authority is hereby authorized and directed to take any and all necessary actions to carry out the terms and conditions of this Resolution.

RESOLUTION No. 2964




Development & Modernization 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: Alana C. Green, Executive Director 

From: Jason Hensley, Director of Real Estate Development

Date: March 8, 2023

Subject: Resolution No. 2964
Authorizing and Approving the Execution of the Capital Fund Program (CFP)
Amendment to the Consolidated Annual Contributions Contract and the Capital
Fund Annual Statement for Fiscal Year 2023

The St. Louis Housing Authority (SLHA) was notified by the U.S Department of Housing and Urban Development (HUD) of a funding award for Fiscal Year 2023 Capital Fund Program allocation of \$8,977,188.00. SLHA completed the FY 2023 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

Board approval of the SLHA FY 2023 Capital Fund Annual Statement and the definition of a significant amendment or modification to the plan are requested. All supporting documents are attached.

Authorizing and Approving the Execution of the Capital Fund Program (CFP) Amendment to the Consolidated Annual Contributions Contract and the Capital Fund Annual Statement for Fiscal Year 2023

WHEREAS, the St. Louis Housing Authority (SLHA) was notified on February 17, 2023 of a funding award for the Fiscal Year 2023 Capital Fund Program for a total of \$8,977,188.00; and

WHEREAS, the Capital Fund Program grant amount is as follows:

Grant Name: FY 2023 Capital Fund Program
Grant Number: MO36-P001-501-23
Grant Amount: \$8,977,188.00

WHEREAS, to be eligible for the Capital Funds, the St. Louis Housing Authority must execute the Annual Contributions Contract (ACC) amendment and submit the Capital Fund Annual Statement.

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

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to execute the Annual Contributions Contract Amendment and the Capital Fund Annual Statement.
2. The Executive Director of the St. Louis Housing Authority is hereby authorized and directed to take any and all necessary actions to carry out the terms and conditions of this Resolution.

2023 Capital Fund

OMB Approval No. 2577-0075
(exp. 08/31/2023)

Capital Fund Program (CFP) Amendment

Annual Contributions Contract
Terms and Conditions (HUD-52840-A)

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

The information collection requirements contained in this document have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0075. There is no personal information contained in this application. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when disclosure is not required. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

Whereas, (Public Housing Authority) St. Louis Housing Authority MO001 (herein called the "PHA")
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into an Annual Contributions Contract
ACC(s) Numbers(s) (On File) dated (On File)

Whereas, in accordance with Public Law 117-328, Division L, Title II,

Whereas, HUD has agreed to provide CFP assistance, upon execution of this Amendment, to the PHA in the amount to be specified below for the purpose of assisting the PHA in carrying out capital and management activities at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. When HUD provides additional amounts, it will notify the PHA and those amended grants will be subject to these terms and conditions.

\$ \$8,977,188.00 for Fiscal Year 2023 to be referred to under the Capital Fund Grant Number MO36P00150123
PHA Tax Identification Number (TIN): On File UEI Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number On File

Now Therefore, the ACC is amended as follows:

1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for capital and management activities of PHA projects. This CFP Amendment is a part of the ACC.

2. The PHA must carry out all capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in accordance with section 9(g)(2) of the Act.

3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.

4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.

5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(j)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(j)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.

6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.

The parties have executed this CFP Amendment, and it will be effective on the date HUD signs below.

U.S. Dept of HUD By <u>/s/</u> Date: 02/17/2023 Marianne Nazzaro Title: Deputy Assistant Secretary Office Public Housing Investments	PHA (Executive Director or authorized agent) By _____ Date: _____ Title _____
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Previous versions obsolete

form HUD-52840-A OMB Approval No.2577-0075 (exp. 08/31/2023)

7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. Provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.

8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.

9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).

(mark one): Yes ☐ No ☒

10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.

11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.

12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must have a recorded and effective Declaration(s) of Trust on all property funded with Capital Fund grants (all types) or HUD will exercise all available remedies including recapture of grant funding.

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: MO36P00150123 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant: FFY of Grant Approval: 2023
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Type of Grant

☒ Original Annual Statement
 ☐ Reserve for Disasters/Emergencies
 ☐ Revised Annual Statement (revision no:
 ☐ Final Performance and Evaluation Report

☐ Performance and Evaluation Report for Period Ending:

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	\$2,244,297.00			
3	1408 Management Improvements	\$60,000.00			
4	1410 Administration (may not exceed 10% of line 15)	\$897,718.00			
5	1480 General Capital Activity	\$4,724,058.00			
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	\$1,051,115.00			
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: St. Louis Housing Authority		Grant Type and Number Capital Fund Program Grant No: MO36P00150123 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: FFY of Grant Approval: 2023
Type of Grant <input checked="checked" 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)	\$8,977,188.00			
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.

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: St. Louis Housing Authority		Grant Type and Number Capital Fund Program Grant MO36P00150123 No: CFFP (Yes/ No): Replacement Housing Factor Grant No: —			Federal FFY of Grant: 2023			
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			\$1,000,000.00				
MO001000019 Parkview Elderly	Replace Roofing			\$58,995.00				
MO001000028 Badenhaus Elderly	Roofing & Water Heater Replacements			\$165,588.00				
MO001000038 California Gardens	Elevator Cab Finishes Replacement & HVAC PTAC Unit Replacements			\$112,930.00				
MO001000038 Folsom	Casework & Countertop Replacements, HVAC Split System Replacements, & Parking Lot Reseal			\$73,252.00				
MO001000038 Lafayette Townhomes	Water Heater Replacements			\$56,810.00				
MO001000038 Marie Fanger	Parking Lot Reseal			\$802.00				
MO001000038 Walnut Park	Roofing & Water Heater Replacements			\$129,533.00				
MO001000041 Hodiament	Board Up Building & Temporary Fencing			\$33,966.00				
MO001000041 McMillan Manor	Install Interior Doors, Flooring, Bathroom Casework, Parking Lot Reseal			\$62,400.00				
MO001000052 King Louis III	Parking Lot Reseal, Playground Surface Replace, & Remediate Suspect Fungal Growth			\$7,935.00				
(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.

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

[illegible]

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

[illegible]

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.

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

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, RAD conversion, 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.

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _ _	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: St. Louis Housing Authority 3520 Page Boulevard St. Louis, MO 63106 Congressional District, if known: 4c MO-1			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: N/A Congressional District, if known:		
6. Federal Department/Agency: U.S. Department of Housing and Urban Development			7. Federal Program Name/Description: Public Housing Capital Fund CFDA Number, if applicable: 14.872		
8. Federal Action Number, if known: MO36-P001-50123			9. Award Amount, if known: \$ 8,977,188.00		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): N/A			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): N/A		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: _____ Print Name: Alana C. Green Title: Executive Director Telephone No.: (314) 286-4357 Date: _____		
Federal Use Only:				Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)	

Certification of Compliance with Public Hearing
Civil Rights Certification HUD-50077-CR
Certification of Compliance HUD-50077-St-HCV-HP

PUBLIC NOTICE

May 9, 2022

**NOTICE OF VIRTUAL PUBLIC HEARING
ST. LOUIS HOUSING AUTHORITY FY 2022 AGENCY PLAN
ADMISSIONS AND CONTINUED OCCUPANCY POLICY
UTILITY ALLOWANCE SCHEDULE
FLAT RENT SCHEDULE
5-YEAR CAPITAL FUND PLAN
WWW.SLHA.ORG**

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 Section 8, Housing Choice Voucher 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, 2022.

This Agency Plan is subject to public review and comment. **The St. Louis Housing Authority is providing a 45-day comment period beginning May 9, 2022, and ending with the Public Hearing on June 22, 2022. The plan will be available at the SLHA's website, <https://www.slha.org/document-center/>.** Written comments will be accepted until June 22, 2022. Contact Fran Bruce, Planning and Procurement Manager, at fbruce@slha.org or by telephone at (314) 286-4365 between the hours of 8:00 a.m. and 4:00 p.m. Monday through Friday to obtain additional information regarding this Agency Plan, Admissions and Continued Occupancy Policy and/or SLHA Utility Allowance Schedule.

SLHA will hold a Virtual Public Hearing on Wednesday, June 22, 2022, at 3:00 p.m. to accept comments on its Agency Plan, Five-year Plan, ACOP, Utility Allowance and Flat Rent Schedules, and Capital Fund Program. Due to the Covid-19 precautions, this year's public hearing will not be held in person. Instructions to join the virtual public hearing are posted on the website. Comments and suggestions received will become part of the public record. Additionally, written comments may be submitted regarding the plan. All written comments must be received by June 22, 2022. Please address comments to Fran Bruce at fbruce@slha.org.

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.

St. Louis Housing Authority's Utility Allowance and the Flat Rent Schedule will be revised and is subject to public review and comment. The proposed Utility Allowance Schedule 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 2022 –FY 2026)** is simultaneously being made available concurrently with the draft of the Agency Plan.

The public is invited to provide comments on the proposed Agency Plan. For additional information or assistance, please contact Fran Bruce by email at fbruce@slha.org or by telephone (314) 286-4365 or TDD (314) 286-4223.



The St. Louis Housing Authority



**ST. LOUIS
HOUSING
AUTHORITY**

St. Louis Housing Authority

FY 2022 Annual Plan

ATTACHMENT #14

Section C.1 – Resident Advisory board (RAB)

Comments and Responses

ST. Louis Tenant Affairs

3217 Dr. M. L. King Dr.

St louis Mo. 63106

314 – 531-1717

Juanita Brown Pres.

Edgar Bryant Secretary

Edith Guthrie V. Pres.

Shelia Williams Sgt.of Arm

Delores Quinn Tres.

June 23, 2022

Mrs. Fran Bruce,

Subject: FY 2022 Agency plan and Five-Year Plan

After consulting with the St. louis Tenant Affairs Board (STLTAB) members we agree that any question that we have had as a group were answered during the St. Louis TAB meeting.

Therefore, there are no comments to the Agency Plan for FY2022 and the five year Action Plan for Fy2022 -2026.

Thank you

Juanita Brown

St. Louis Tenant Affairs Board

St. Louis Housing Authority (SLHA)
Public Hearing Comments and Responses
Annual Plan FFY 2022

The St. Louis Housing Authority issued the proposed Agency Plan for public comments on May 9, 2022, for a 45-day comment period. On June 22, 2022, the virtual Public Hearing was held. There were no attendees besides the SLHA staff. SLHA received one (1) comment in writing for the Public Hearing.

I. COMMENTS TO THE AGENCY PLAN:

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

II. COMMENTS TO THE ADMISSIONS AND CONTINUED OCCUPANCY POLICY:

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

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

On June 22, 2022, Mr. Jason W. Hensley, Director of Real Estate Development of St. Louis Housing Authority, provided a statement regarding the increase to the funding allocation for FY 2022. The comment and response is as follows:

Comment #1:

The St. Louis Housing Authority (SLHA) draft Five-Year Capital Fund presented for public comment on May 9, 2022, utilized the FFY 2021 Capital Fund allocation received from HUD to estimate capital spending for FFY 2022. This estimate was used because the actual FFY 2022 Capital Fund allocation had not yet been released by HUD. Since issuing the plan for comment, SLHA has received HUD notification of the FFY 2022 Capital Fund allocation in the amount of \$9,596,182. This is an increase of \$1,284,173.

The additional funds allocated by HUD will be used by SLHA to increase PHA-Wide line items in the budget and to increase the amounts for administration and operation line items to the allowable HUD limits for FFY 2022.

SLHA Response:

The Annual Statements and Five-Year Action Plan (Budgets) have been revised to incorporate the allocation increase as proposed.

ST. LOUIS POST-DISPATCH

AFFIDAVIT OF PUBLICATION

St. Louis Housing Authority
Attn: Affidavit Enclosed
3520 Page Blvd.
St. Louis, MO 63106

Ad # 86311-1

PO: 412 Fran Bruce

THE ATTACHED ADVERTISEMENT WAS PUBLISHED
In The St. Louis Post-Dispatch and online STLToday.com On the following dates:
May 8, 2022

The St. Louis Housing Authority (SLHA) is submitting to HUD the Annual Submission of the FY 2022 Agency Plan. The Plans outlines the goals and objectives to accomplish its vision over the next five years. SLHA has posted the "Draft" FY 2022 Agency Plan for public review on its website at <https://www.slha.org/document-center/>.

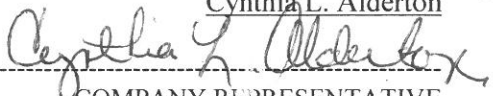
Additionally, the Admissions and Continued Occupancy Policy (ACOP), a component of the Agency Plan, and a revised Utility Allowance Schedule and the Flat Rent Schedule are simultaneously being made available for public review and comment. The link to the webpage is: <https://www.slha.org/document-center/>.

Also, the Capital Fund Program Five-Year Action Plan (FY2022 - FY2026) is simultaneously being made available for public review and comment.


SLHA will hold a Virtual Public Hearing on Wednesday, June 22, 2022, at 3:00 p.m. to accept comments on its Agency Plan, ACOP, Utility Allowance, Flat Rent Schedules and Capital Fund Program. Due to the COVID precautions, this year's public hearing will not be held in person. Instructions to join the virtual public hearing are posted on the website. Comments and suggestions received will become part of the public record. Additionally, written comments may be submitted on the plan. All written comments must be received by June 22, 2022. Please address comments to Fran Bruce at fbruce@slha.org.

For additional information or questions, contact Fran Bruce, Planning and Procurement Manager, by email at fbruce@slha.org or by telephone at (314) 286-4365 between the hours of 8:00 a.m. and 4:00 p.m. Monday through Friday.

Cynthia L. Alderton


COMPANY REPRESENTATIVE

SWORN TO AND SUBSCRIBED BEFORE ME
THIS May 9, 2022.


NOTARY PUBLIC, CITY OF ST. LOUIS

AFFIDAVIT CHARGE \$ 5.00 EACH

MADELINE KELLER
Notary Public - Notary Seal
St Charles County - State of Missouri
Commission Number 19569759
My Commission Expires Mar 12, 2023

Customer Ad Proof

220-60005232

ST LOUIS HOUSING AUTHORITY

Order Nbr 86311

Publication
Contact
Address 1
Address 2
City St Zip
Phone
Fax
Section
SubSection
Category
Ad Key
Keywords
Notes

Post - Dispatch
ST LOUIS HOUSING AUTHORITY
3520 PAGE BLVD
ST LOUIS MO 63106
3142864210
Legals
9005 Bids and Proposals
86311-1
The St. Louis Housing Authorit
On hold pending approval
Deadline for Sunday is Thursday at 4pm
[Tanya Lemons 4/25/2022 10:48:50 AM]
[Tanya Lemons 4/25/2022 10:49:14 AM]
[Tanya Lemons 4/25/2022 11:53:43 AM]

PO Number	412 Fran Bruce
Rate	Legal
Order Price	2099.64
Amount Paid	0.00
Amount Due	2099.64
Start/End Dates	05/08/2022 - 05/08/2022
Insertions	1
Size	64
Salesperson(s)	Tanya Lemons I023
Taken By	Tanya Lemons

Ad Proof

The St. Louis Housing Authority (SLHA) is submitting to HUD the Annual Submission of the FY 2022 Agency Plan. The Plans outlines the goals and objectives to accomplish its vision over the next five years. SLHA has posted the "Draft" FY 2022 Agency Plan for public review on its website at <https://www.ssha.org/document-center/>.

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For additional information or questions, contact Fran Bruce, Planning and Procurement Manager, by email at fbruce@ssha.org or by telephone at (314) 286-4365 between the hours of 8:00 a.m. and 4:00 p.m. Monday through Friday.

St. Louis American 4/25/2022

Hi Fran,

1 week Ad run date: 05/05

Ad size: 3 x 6.5

Ad cost : **\$770.62**

Includes \$5 Affidavit

Includes two \$5 Live Website Links

Please confirm ad to run by Tuesday 5pm

Thanks

Angie

Angelita Houston
Classified Manager
St. Louis American Newspaper
ahouston@stlamerican.com
314-289-5430

Hi Angie,

Attached is the revised notice. It changes the Public Hearing date from June 15, 2022 to June 22, 2022 in two places. I have highlighted the change in the attached Notice.

Thanks,
Fran

Fran Bruce, Planning and Procurement Manager - St. Louis Housing Authority - 3520 Page Blvd. - St. Louis, MO 63106 - p 314.286.4365 - f 314.289.7365 - fbruce@slha.org - www.slha.org

From: Fran Bruce
Sent: Monday, April 25, 2022 10:34 AM
To: Angelita Houston <ahouston@stlamerican.com>
Subject: RE: Request for Quotation - Advertisement

Good morning Angie,

As previously mentioned, I will need to push out the dates for the advertisement to **5/5/2022**. I will revise the ad to make changes to the dates in the notice and get it back to you promptly.

Thank you,
Fran

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 2022 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.

The 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 Executive Director:

Alana C. Green

Signature Alana C. Green Date 7/15/2022

Name of Board Chairperson:

Sal Martinez

Signature Sal Martinez Date 7/15/2022

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.

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 2022, 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 identity, 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

X Annual PHA Plan for Fiscal Year 2022

_____ 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 Executive Director		Name Board Chairman	
Alana C. Green		Sal F. Martinez	
Signature 	Date 7/15/2022	Signature 	Date 7/15/2022

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.

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

Public reporting burden for this information collection is estimated to average 30 minutes. This includes the time for collecting, reviewing, and reporting data. The information requested is required to obtain a benefit. This form is used to ensure federal funds are not used to influence members of Congress. 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.

Applicant Name

St. Louis Housing Authority

Program/Activity Receiving Federal Grant Funding

Public Housing Capital Fund

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Alana C. Green

Title

Executive Director


Signature

Date (mm/dd/yyyy)

EXECUTIVE DIRECTOR REPORT

MEMORANDUM

To: Board of Commissioners

From: Alana C. Green 

Date: March 20, 2023

Subject: Executive Director Report

It is my pleasure to present this report for your review. Additional and specific information related to SLHA activities can be found in the Monthly Activity Report, also presented for your review. Please do not hesitate to contact me with questions. Thank you.

Clinton-Peabody Redevelopment: SLHA and POAH hosted its second resident engagement meeting the evening of March 15, 2023 at the Al Chappelle Community Center. Approximately 40 families attended and began the process of identifying wants and needs for the new redevelopment. SLHA and POAH also discussed the Rental Assistance Demonstration process with residents at two meetings, on March 15 and March 16, 2023. The next resident meeting will be in April at the Al Chappelle Community Center. Residents, SLHA Commissioners, and appropriate SLHA staff are invited to attend.

In addition to the resident meetings, SLHA and POAH met with City partners from SLDC, PDA, DHS and Ameren on March 16 and inspected vacant units. During the month of March, SLHA and POAH also submitted a \$3M Community Project Funding request through Congresswoman Cori Bush's application process for the redevelopment of Clinton-Peabody.

Historic Increase in Housing Choice Voucher Funding: HUD has evaluated the Consolidated Appropriations Act of 2023 and estimates that it provides funding at approximately a 99% HAP proration and a 91% Administrative Fee proration. At this level of HAP funding, SLHA can anticipate an offset and reallocation from HAP program reserves that will ensure an overall HAP proration of approximately 100%. The SLHA Finance and HCV staff met in March to calculate the projected HAP renewal funding and to brainstorm ways to increase utilization. As a result, SLHA is considering the issuance of a Project-Based Vouchers RFP.

Parkview Designated Housing Plan: In accordance with the most recent Annual Plan and to provide a safe environment for seniors living in public housing to age in place, SLHA is actively drafting a Designated Housing Plan to request approval from HUD to convert Parkview Apartments to an "elderly only" housing development. SLHA is actively drafting the plan, which we expect to have completed by March 31.

Technical Assistance Consultants and Development of a Comprehensive Real Estate Portfolio Plan: SLHA's most recent strategic plan calls for the development and implementation of a portfolio plan for the Agency. This plan will serve as an internal tool to guide and prioritize the timing and funding of developments. It will also ensure that Agency assets are maintained,

redeveloped, acquired, and disposed of in accordance with the Agency's mission and vision, and in accordance with HUD regulations and other federal rules. HUD agreed to provide a technical assistance consultant to assist SLHA in developing its plan, and after a site visit and several meetings with SLHA staff, the consultant prepared a draft plan that was presented to the Commissioners at the January meeting. Next steps include developing an action plan and training staff and Commissioners on the Rental Assistance Demonstration Program.

Asset Repositioning Updates: A resolution to submit a Rental Assistance Demonstration application to HUD for Clinton-Peabody will be presented at the March Commissioners meeting. This is the first asset repositioning request and will be instrumental in ensuring proper long-term funding to continue critical repairs. Subsequent resolutions will be presented for King Louis I and II and Arlington Grove at a future meeting.

Replacement Housing Factor Funding: SLHA has changed its strategy for the use of Replacement Housing Factor (RHF) funds. Per HUD, PHAs are permitted under the Rental Assistance Demonstration (RAD) program to use available public housing funding, including RHF funds, as a source of capital in the development budget to support RAD conversion, whether for rehabilitation or new construction, as well as to increase initial contract rents. Eligible conversion-related uses for these funds include pre-development, development, or rehabilitation costs of the Covered Project, which makes the use for Clinton-Peabody a valid use of funds. SLHA is submitting a RAD application to HUD to secure the use of RHF funds (see above comment).

Occupancy: Increasing occupancy in public housing continues to be a high priority for SLHA. In an effort to move families into decent, safe, and sanitary housing, SLHA utilizes Capital Funds to rehabilitate/modernize units; meets with third-party property management staff regularly to track current and future vacancies (and to discuss solutions); and meets with HUD regularly to provide an update, among other things. In making decisions related to occupancy, SLHA is often faced with financial and human capital constraints, particularly as it pertains to the third-party management companies. As a result, SLHA continues to issue letters specifically related to property management non-compliance.

As reflected in our Physical Needs Assessment, many units and buildings within our portfolio require extensive repairs and updates due to decades of deferred maintenance and disinvestment on the federal level. The need for additional funding for public housing can be seen across the country, as housing authorities are tasked year after year with doing more with less. SLHA continues to work to reposition assets to stabilize property portfolios, increase occupancy, and in accordance with our 2020 – 2024 Strategic Plan.

Housing Choice Voucher Utilization and Performance: SLHA continues to focus on improving relationships with landlords, increasing voucher utilization, and reducing the recertification backlog. Names are being pulled from the waitlist and new vouchers are being issued on a regular basis. Several barriers have resulted in slow lease up of families, including the lack of quality, affordable housing in St. Louis and discrimination based on source of income. SLHA continues to work with local partners to identify viable solutions to these barriers.

HUD Comprehensive Monitoring Visit: HUD will conduct an onsite comprehensive monitoring review of SLHA activities the week of April 24. This is the first comprehensive monitoring visit completed by HUD since 2009.

Meeting and Site Visit with HHS and HUD Officials: SLHA will host Joe Palm, Regional Director of the U.S. Department of Health and Human Services, and HUD Regional Administrator, Deke Clayborn and staff, for a meeting on March 28. The purpose of the meeting is to identify ways that HHS and HUD funds can be used to enhance the lives of the families served by SLHA.

Historical Artifacts (Donation to History Museum): At the request of Pruitt-Igoe Forever, SLHA has met with former residents to determine a good home for two plaques that were located in the community space of each building (and are currently being held at SLHA). After subsequent meetings with museum curators, donating the plaques to the History Museum may be the best option to maintain the condition of the artifacts and so that the artifacts may be exhibited. A resolution will be presented to the Board in the first part of 2023 to, upon approval, transfer the artifacts to the History Museum. The Pruitt-Igoe Forever team would like to host a formal transfer event at the St. Louis Housing Authority in May.