

ST. LOUIS
HOUSING
AUTHORITY

Agency Plan

Annual Plan for Fiscal Year 2023

Draft

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Submitted by:

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Executive Director

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Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

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

Definitions.

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

A.	PHA Information.																																
A.1	<p> PHA Name: <u>St Louis Housing Authority (SLHA)</u> PHA Code: <u>MO1-001</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) <u>7165</u> Allocated Number of Public Housing (PH) Units <u>2809</u> Number of Housing Choice Vouchers (HCVs) <u>5939</u> Leased (March 2023) Total Combined Units/Vouchers <u>8748</u> (March 2023) PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. Reference Attachment #1 – A.1 Availability of Information </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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		PH	HCV																														
Lead PHA:																																	

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs Reference Attachment #2 – B.1 (b) <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. Reference Attachment #3 – B.1 (b) <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources. Reference Attachment #4 – B.1 (b) <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. Reference Attachment #5 – B.1 (b) <input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management Reference Attachment #6 – B.1 (b). <input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures. <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs. Reference Attachment #7 – B.1 (b) <input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs. Reference Attachment #8 – B.1 (b) <input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy. <input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management. Reference Attachment #9 – B.1 (b) <input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation. <input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s): <i>Reference attachments listed above.</i></p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review. Reference Attachment #10 – B.1 (c)</p>
B.2	<p>New Activities. Reference Attachment #11 – B.2 (b) – New Activities Chart</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?</p> <p>Y N</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods. <input checked="" type="checkbox"/> <input type="checkbox"/> Mixed Finance Modernization or Development. <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input checked="" type="checkbox"/> <input type="checkbox"/> Designated Housing for Elderly and/or Disabled Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers. <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies. <input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers. <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. Reference Attachment #12 – B.1 (b) <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report. Reference Attachment #13 – B.3</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>

B.4	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>“See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 08/31/2022”</p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Resident Advisory Board (RAB) Comments. Reference Attachment #14 – C.1</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials. Reference Attachment #15 – C.2</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Reference Attachment #17 – C.3</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
C.5	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>D. Affirmatively Furthering Fair Housing (AFFH).</p>	

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

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Describe fair housing strategies and actions to achieve the goal

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Describe fair housing strategies and actions to achieve the goal

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

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

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

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

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

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

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

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

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

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

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

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

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

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

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the

coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

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

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

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

Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

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

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

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

HOPE VI or Choice Neighborhoods. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for HOPE VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 . (Notice PIH 2011-47)

Mixed Finance Modernization or Development. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and **2)** A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission; **5)** the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

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

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

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD’s website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan ([24 CFR §903.7\(b\)](#)).

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

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

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

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section ([24 CFR §903.7 \(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on **08/31/2022.**”

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the **RAB for comment** before implementation, **approved by the PHA board**, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations*

Includi

ng PHA Plan Elements that Have Changed. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations, impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction’s initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark “yes,” and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark “no.” If the PHA is not troubled, mark “N/A.” ([24 CFR §903.9](#))

D. Affirmatively Furthering Fair Housing (AFFH).

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

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

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

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

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

St. Louis Housing Authority
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Table of Attachments

Annual PHA Plan (Standard PHAs) – HUD-50075-ST

Attachment #1	Section A.1 – Availability of Information
Attachment #2	Section B.1 (b) – Statement of Housing Needs – Jurisdiction Needs Chart
Attachment #3	Section B.1 (b) – Deconcentration Policy and other Policies that Govern Eligibility, Selection and Admissions (Admin. Plan & ACOP matrix and HUD Income Limits and Wait List)
Attachment #4	Section B.1 (b) – Financial Resources
Attachment #5	Section B.1 (b) – Rent Determinations
Attachment #6	Section B.1 (b) – Operation & Management – Turnover Chart
Attachment #7	Section B.1 (b) – Homeownership (Reference Attachment 11– New Activities)
Attachment #8	Section B.1 (b) – Community Service and FSS Programs
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Attachment #14	Section C.1 – Resident Advisory Board (RAB) Comments
Attachment #15	Section C.2 – Certification by State or Local Officials - HUD-50077-SL
Attachment #16	Section C.3 a - Certification of Compliance - HUD-50077-ST-HCV-HP
Attachment #17	Section C.3 b– Civil Rights Certification – HUD-50077-CR

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ATTACHMENT #1

Section A.1 – PHA Information
Availability of Information

SLHA maintains relevant information regarding the Agency Plan at on its website (www.slha.org), main administrative office and at each Asset Management Developments Listed Below:

1. St. Louis Housing Authority, 3520 Page Boulevard, St. Louis, MO 63106
2. Clinton-Peabody – MO001-000002, 1401 LaSalle Street, St. Louis, MO 63104
3. James House – MO001-000010, 4310 St. Ferdinand, St. Louis, MO 63113
4. Euclid Plaza – MO001-000013B, 5310 N. Euclid, St. Louis, MO 63115
5. McMillan Manor (North Side Scattered Sites) – MO001-000041,051
1007 N. Taylor, St. Louis, MO 63108
6. West Pine – MO001-000017, 4490 West Pine, St. Louis, MO 63108
7. Parkview Apartments – MO001-000019, 4451 Forest Park, St. Louis, MO 63108
8. Lafayette Apartments (South Side Scattered Sites) – MO001-000038
3447 Lafayette, St. Louis, MO 63104
9. Badenhous & Badenfest – MO001-000028, 8450 Gast Place, St. Louis, MO 63147
10. LaSalle Park – MO001-000034, 1001 Hickory, St. Louis, MO 63104
11. Cochran Plaza – MO001-000037, 1420 N. 10th Street, St. Louis, MO 63106
12. Murphy Park I, II & III – MO001-000044,045,046
1920 Cass Avenue, St. Louis, MO 63106
13. King Louis Square I – MO001-000047, 1524 S. 13th Street, St. Louis, MO 63104
14. King Louis Square II – MO001-000049, 1129 Hickory Street, St. Louis, MO 63104
15. Les Chateaux – MO001-000048, 1330 Chouteau, St. Louis, MO 63103
16. Renaissance Place at Grand I, II, & III – M036-P001-050, 057,059
1001 N. Compton, St. Louis, MO 63106
17. Senior Living and Gardens at Renaissance Place – M0001-000054, and MO001-000055
3217 Martin Luther King, St. Louis, MO 63106
18. Cahill House – MO001-000056, 1919 O’Fallon Place, St. Louis, MO 63106
19. Cambridge Heights I & II – MO001-000058,060, 703 O’Fallon, St. Louis, MO 63106
20. Kingsbury Terrace – MO001-000061, 5655 Kingsbury, St. Louis, MO 63112
21. Senior Living at Cambridge Heights - MO001-000062, 728 Biddle, St. Louis, MO 63106
22. Arlington Grove – MO001-000063, 5547 Dr. Martin Luther King, St. Louis, MO 63112
23. North Sarah I, II & III Apartments - MO001-000064,065, 066
1024 North Sarah, St. Louis, MO 63113
24. Preservation Square I – MO001-000067, 1406 N. 16th Street, St. Louis MO 63106

Detailed information regarding the Agency Plan components can be viewed at the SLHA website, www.slha.org. The Agency Plan and all relevant components are available for viewing by appointment only at the SLHA’s Central Office, located at 3520 Page Blvd., St. Louis, MO 63106. The SLHA’s Admissions and Continued Occupancy Policies can only be viewed online or by appointment. To scheduling a viewing appointment, please contact Fran Bruce at (314) 286-4365 or by email at fbruce@slha.org.

All resident organizations are provided with a copy of the Agency Plan.

St. Louis Housing Authority

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ATTACHMENT #2

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

Item 1 – Statement of Housing Needs

In accordance with HUD Requirements, the PHA is required to assess the housing needs within the community as a part of its Annual Plan. Based on available data, the PHA is required to make reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The PHA to rate the impact of the following factors on the housing needs of families using a scale of 1 to 5 with 1 considered “no impact,” and 5 being “severe impact.”

- **Affordability** - the impact of rent burden (i.e., rent comprising more than 30 percent of income) or severe rent burden (i.e., rent comprising more than 50 percent of income);
- **Supply** - the impact of the shortage of units available for occupancy;
- **Quality** - the prevalence of units in substandard physical condition;
- **Accessibility** - the availability of units that are accessible for persons with mobility impairments;
- **Size** - considers any mismatch between the units available and family sizes; and
- **Location** – the extent to which the supply of units’ available limits housing choices for families to particular locations, notably areas of poverty/minority concentration.

SLHA’s Statement of Housing needs is included on the following table: *Housing Needs of Families in the Jurisdiction by Family Type*. In order to maintain consistency, the same methodology was used for 2022 as in previous although the data is limited in some categories and may not reflect current market conditions. The St. Louis Housing Authority is located in a jurisdiction identified by HUD to have significant rental market fluctuations and has been approved for an increase in payment standards for Housing Choice Vouchers up to 120 percent of the FMR in accordance with PIH Notice 2022-30 which extends the regulatory waiver through December 31, 2023. In addition, the jurisdiction is currently experiencing many affordable housing challenges due to ongoing effects from COVID including but not limited to a lack of affordable units, increasing housing costs and increasing construction costs.

Housing Needs of Families in the Jurisdiction by Family Type

Family Type	Overall	Affordability	Supply	Quality **	Accessibility	Size	Location
Income <= 30% of HAMFI	35,555	4	*	4	*	*	*
Income >30.1% but <=50% of HAMFI	22,200	4	*	4	*	*	*
Income >50.1% but <80% of HAMFI	26,780	2	*	2	*	*	*
Elderly	35,175	2	*	2	*	*	*
Population with Disabilities	94,000	*	*	3	*	*	*
Caucasian, Non-Hispanic	67,925	2	*	1	*	*	3
African American, Non-Hispanic	61,680	3	*	2	*	*	5
Asian or Pacific Islander, Non-Hispanic	3,880	3	*	2	*	*	4
Hispanic	4,274	3	*	2	*	*	4
Other, Non-Hispanic	2,045	3	*	2	*	*	*

Notes: Numbers reflect population or households, renters and homeowners; Elderly = 62+; Grading was established such that 1=0-20%, 2=20.1-40%, 3=40.1-60%, 4=60.1-80%, 5=80.1-100%; Data taken from AFFH version 0006, Map 6, "housing problems" tables 1, 9 & 12 and CHAS data 2015-2019, tables 5, 6, 7, 9, & summary table.

***There is no data available to make determinations in the indicated categories.**

In addition to the data included in the table, the St. Louis Affordable Housing Report Card (2021) had several key findings related to the Housing Needs included in their recent report (<https://www.affordablestl.com/>). Some of the key findings include a lack of affordable housing for extremely low-income individuals (at or below 30% of AMI). In St. Louis City and County, there is a gap of approximately 35,000 affordable units needed—28,000 1-bedrooms, 7,000 2-bedrooms, and 1,900 3-bedroom. The report also issued Affordable Housing Grades for different groups. The following groups are also included in the Housing Needs of Families Table for St. Louis City and County:

Affordable Housing Grades – Select Groups *St. Louis Affordable Housing Report Card (2021)*

All Households	C
Households with Income from 0-30% AMI	F
Households with Income from 31-50% AMI	F
Households with Income from 51-80% AMI	D
White Households	C
Black Households	F

St. Louis Housing Authority
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ATTACHMENT #3

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

Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions

**Administrative Plan (Section 8 Housing Choice Program) - Changes
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes**

- Section 8 /Housing Choice Voucher Program: *Revisions since last Annual Plan Submission:*

Administrative Plan:

Emergency Transfer Plan: The Administrative Plan will be revised to include SLHA’s Emergency Transfer as an Appendix. A copy is included with the Agency Plan as Attachment 3A.

- Public Housing: - St. Louis Housing Authority’s Admissions and Continued Occupancy Policy (ACOP) contains the provisions for Eligibility, Selection and Admissions Policies including Deconcentration and Wait List Procedure for Public Housing Residents. *Revisions since last Annual Plan Submission:*

Admissions and Continued Occupancy Policy (ACOP)

Revisions to the ACOP, a component of the Agency Plan, have been made and therefore, are subject to public review and comment. The ACOP comment period is concurrently with this plan. The ACOP is under a separate cover and not an attachment to this plan update.

Revisions to the ACOP – Matrix provides summary of changes (attachment 3B).

Tenant Parking Procedure (ACOP Appendix #1) – As a result of several meetings with residents and the St. Louis Metropolitan Police, SLHA is proposing revising the Tenant Parking Procedure. Both the current *Tenant Parking Procedure* and the proposed *Resident Parking Procedure* are included as attachments along with the list of revisions to the ACOP. The purpose of the proposed changes is to clarify the requirements for issuing parking stickers, so it is easier for residents to register vehicles with Management. It is also anticipated that this change will assist Management in identifying non-resident derelict vehicles and acting in accordance with the proposed procedure. (Reference Attachment 3C).

Income Limits Chart (ACOP Appendix #2) - HUD annually revises the Income Limits to adjust to the average median income levels (Attachment 3D).

Flat Rent Comparables (ACOP Appendix #3) – SLHA annually revises the Flat Rent Comparables to adjust rent limits comparable to local area rents (Attachment 3E). (Reference Attachment 5).

Emergency Transfer Plan: The ACOP will be revised to include SLHA’s Emergency Transfer Plan as a new Attachment. A copy is included with the Agency Plan as Attachment 3F.

Site Based Waiting Lists: Currently SLHA has 25 site-based waiting lists. SLHA plans to merge the waiting list for Armand and Ohio (MO00100038) with the larger Southside Scattered Sites Waiting List (MO00100038). All Armand and Ohio applicants will be contacted and once the list is exhausted it will not be reopened. Going forward, all new applicants will be pulled from the Southside Scattered Sites waiting list. Once this process has been completed, SLHA will have 24 site-based waiting lists.

Waiting Lists Openings - In FY 2023, SLHA expects to re-open the Waiting Lists for several SLHA properties. Reference attached table containing all Waiting Lists by Locations (Attachment 3G).

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

SLHA is concerned about the safety of the participants¹ in its programs, and such concern extends to residents who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),² SLHA allows program participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from their current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.³ The ability of SLHA to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether SLHA has another dwelling unit that is immediately available⁴ tenant for temporary or more permanent occupancy.

There are five parts to this emergency plan:

- Part 1: Eligibility for Emergency Transfers**
- Part 2: Emergency Transfer Request Documentation**
- Part 3: Confidentiality**
- Part 4: Emergency Transfer Timing and Availability**
- Part 5: Safety and Security of Program Participants**

¹ For purposes of this Emergency Transfer Plan, the terms “participant,” “tenant,” “resident,” and “individual” are interchangeable.

² Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

³ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

⁴ For the purposes of this emergency transfer plan, SAHA defines “immediately available” as a vacant unit ready for move-in within a reasonable period of time.

Part 1: Eligibility for Emergency Transfers

As provided in HUD regulations at 24 CFR 5.2005(e)(2), a program participant is eligible for an emergency transfer if **one** of the following applies:

1. The participant is a victim of domestic violence, dating violence, sexual assault, or stalking; or
2. The participant reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit; or
3. If the participant is a victim of sexual assault, and the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

An applicant or participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this Plan and submit it to:

**Attn: VAWA Coordinator
St. Louis Housing Authority
3520 Page Blvd.
St. Louis MO 63106**

or

VAWA@slha.org

Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Eligibility for an emergency transfer does not guarantee continued assistance under the program or a transfer to another covered housing program.

The emergency transfer requirements do not supersede any eligibility or occupancy requirements that may apply under a covered housing program [24 CFR 5.2005(e)(13)].

Part 2: Emergency Transfer Request Documentation

If an applicant or tenant represents to SLHA that they or a member of their household is a victim of domestic violence, dating violence, sexual assault, or stalking entitled to the protections or remedies under VAWA, SLHA may request (but is not required to request), in writing, that the applicant or participant submit to SLHA the documentation described in Section B of this Part 2.

However, SLHA may choose to provide benefits to an individual based solely on the individual's verbal statement or other corroborating evidence. In cases where SLHA decides to rely on such information, SLHA will document, in a confidential manner, the individual's verbal statement or other corroborating evidence.

A. Written Request for Documentation [24 C.F.R. 5.2007(a)(1)]

If SLHA chooses to request an individual to document their claim of domestic violence, dating violence, sexual assault, or stalking, SLHA must make such request in writing and include the following:

- a deadline of fourteen (14) business days following receipt of the request;
- description of the three forms of acceptable documentation, and
- instructions on where and to whom the documentation must be submitted.

SLHA may choose to extend the 14-day period. [24 C.F.R. 5.2007(a)(2)(ii)] In determining whether to do so, SLHA will consider factors that may contribute to the individual's inability to provide the documentation in a timely manner. These factors may include, but are not limited to the following:

- cognitive limitations
- disabilities
- limited English proficiency
- absence from the unit due to hospitalization or time in an emergency shelter
- administrative delays in obtaining police or court records,
- danger of further violence, and
- the individual's need to address health or safety issues.

SLHA will also grant reasonable accommodation for persons with disabilities.

During the 14-day period and any granted extensions, SLHA may not take any adverse actions, such as eviction, termination, or denial against the individual requesting VAWA protection.

However, if an applicant or participant does not provide the documentation requested by SLHA within the 14-day period and any granted extensions, SLHA may:

- Deny admission by the applicant or tenant to the covered housing program;
- Deny assistance under the covered housing program to the applicant or tenant;
- Terminate the participation of the tenant in the covered housing program; or
- Evict the tenant, or a lawful occupant that commits a violation of a lease.

[24 C.F.R. 5.2007(a)(2)(i)]

B. Permissible Documentation [24 C.F.R. 5.2007(b)(1)(i)-(iii)]

The individual may satisfy SLHA's request for documentation by providing any **one** of the following permissible forms of documentation. It is at the discretion of the applicant or participant which one of the forms of documentation to submit:

1. A completed and signed Form HUD-5382, *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* that:
 - States the applicant or tenant is a victim of domestic violence dating violence, sexual assault or stalking;
 - States the incident of domestic violence, dating violence, sexual assault, or stalking meets the applicable definition under VAWA; and
 - Includes the name of the individual who committed the domestic violence, dating violence, sexual assault or stalking **if** the name is known **and** safe to provide.
2. A document that:
 - is signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively "professional") from whom the victim has sought assistance relating to domestic violence,

dating violence, sexual assault, or stalking, or the effects of such abuse;

- is signed by the applicant or tenant; and
 - specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under VAWA, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under VAWA.
3. A record of a Federal, State, tribal, territorial or local law enforcement agency, court or administrative agency.

If the applicant or participant submits a completed and signed *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* (Form HUD-5382), additional third-party documentation is not required, **unless** for the reasons specified below under "Conflicting Documentation." [24 CFR 5.2005(e)(10)]

C. Conflicting Documentation [24 CFR 5.2007(b)(2)]

If SLHA receives documentation under the above section that contains conflicting information, SLHA may require an applicant or participant to submit third-party documentation, as described in Section B (2) and (3) above, within thirty (30) calendar days of the date of the request for the third-party documentation.

Conflicting information includes, but is not limited to:

1. More than one applicant or participant provides documentation to show they are victims of domestic violence, dating violence, sexual assault or stalking, and the information in one person's documentation conflicts with the information in another person's documentation; or
2. Submitted documentation contains information that conflicts with existing information already available to SLHA.

In the circumstance that an individual has submitted conflicting documentation, SLHA may request the individual submit any one of the following to meet the third-party documentation request:

1. A document that:

- is signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively “professional”) from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of such abuse;
 - is signed by the applicant or tenant; and
 - specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under VAWA, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under VAWA.
2. A record of a Federal, State, tribal, territorial or local law enforcement agency, court or administrative agency.

SLHA must grant the individual thirty (30) calendar days from the date of the request to provide such third-party documentation.

If the individual submits third-party documentation that meets the above criteria and supports the individual's VAWA request, SLHA will **not** require further documentation of the individual's status as a victim of domestic violence, dating violence, sexual assault, or stalking.

If the individual does not submit any third-party documentation within the required time period or submits documentation that does not meet the above criteria, SLHA may, but is not required to, accept that individual's assertion of victim status for the purpose of VAWA protection.

Part 3: Confidentiality

SLHA will keep confidential any information related to the exercise of the applicant's or participant's rights under VAWA, including the fact that they are exercising their rights under VAWA. [24 CFR 5.2007(c)]

SLHA will not allow any individual administering assistance or other services on its behalf (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

SLHA will not enter information provided under this Plan into any shared database or disclose information to any other entity or individual. SLHA, however, may disclose the information provided if:

- The victim gives written permission to SLHA to release the information on a time limited basis.
- SLHA needs to use the information in an eviction or termination proceeding, such as to evict the abuser or perpetrator or terminate the abuser or perpetrator from assistance under this program.
- A law requires SLHA or a landlord to release the information.

SLHA will not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant. [24 CFR 5.2005(e)(4)]

Part 4: Emergency Transfer Timing and Availability

SLHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. SLHA will, however, act as quickly as possible to move a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit.

The emergency transfer requirements do not supersede any eligibility or occupancy requirements that may apply under a covered housing program [24 CFR 5.2005(e)(13)]; therefore, the emergency transfer plan does not guarantee an external transfer to another covered housing program.

At the applicant or participant's request, SLHA will assist with contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this Plan.

A. Housing Choice Voucher (HCV) Program [24 CFR 5.2005(e)(9)]

When a participant communicates an emergency transfer request due to reasons that fall under VAWA, the VAWA Coordinator will handle the request as follows:

1. The VAWA Coordinator will ask the participant to provide contact information at which the victim feels safe receiving communication and the manner of communication (e.g. phone call, email, U.S. Mail).
2. The VAWA Coordinator will provide the individual with the *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* form (Form HUD-5382) and *Notice of Occupancy Rights* attached to this Plan [24 CFR 5.2005], along with a written request for documentation that includes the following:
 - a deadline of fourteen (14) business days following receipt of the request;
 - description of the three forms of acceptable documentation, and
 - instructions on where and to whom the documentation must be submitted.
3. The VAWA Coordinator will review the request once the completed Form HUD-5382 or other acceptable documentation has been submitted and determine whether the case falls under VAWA definitions.

4. If the case falls under VAWA definitions, the VAWA Coordinator will send an e-mail to the assigned Housing Specialist instructing that the individual should be issued a voucher to move, and that issuance of the voucher is time-sensitive.
5. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.
6. The assigned Housing Specialist will expedite completing the recertification (if recertification is necessary) and issue the voucher to the participant.
7. The VAWA Coordinator will inform the participant that local victim service providers may be able to assist them with identifying temporary shelter or other services, such as safety planning, counseling, and emergency funding. The VAWA Coordinator will provide the list of resources in this Plan.
8. When the participant's Request for Tenancy Approval is submitted SLHA will expeditiously inspect the unit, conduct a rent reasonableness determination, and prepare the HAP contract.
9. **Family Break-Up.** The VAWA Coordinator may instruct the Housing Specialist to issue a voucher to facilitate the emergency transfer of the victim without first terminating assistance to the perpetrator. [24 CFR 982.315(a)(2)]
10. SLHA will not enter information provided under this Plan into any shared database or disclose information to any other entity or individual. However, the VAWA Coordinator will retain VAWA documentation in a separate case file for a period of three (3) years after completion of the request, including a record of each request made under this Plan and the outcomes of each request. [24 CFR 5.2005(e)(12)]

No restrictions on moves. SLHA's policies on restricting timing and number of moves **do not** apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health and safety of the family or family member. [24 CFR 982.354(c)(2)(iii)]

Porting. If the participant requests to move outside of SLHA's jurisdiction, the portability regulations will still apply [PIH Notice 2016-09].

B. Project-Based Voucher (PBV) Program⁵

Unlike families receiving tenant-based assistance under the HCV program, PBV families cannot move with their project-based assistance as the assistance is tied to the unit. However, if a participant makes an emergency transfer request and SLHA's VAWA Coordinator determines the case falls under VAWA definitions, SLHA will offer the participant a transfer to an available Project-Based Voucher unit provided the participant meets any tenant screening or eligibility requirements of the property.

Participants will not be denied admission on the basis or as a direct result that the applicant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

If there is no safe Project-Based Voucher unit immediately available, SLHA will offer the family a tenant-based voucher in accordance with the procedures outlined in this Plan.

C. Public Housing Program

For purposes of this Section:

- *Internal emergency transfer* refers to an emergency relocation of a tenant to another unit where the tenant would not be considered a new applicant, meaning the tenant may reside in a new unit without having to undergo an application process. [24 CFR 5.2005(1)(e)(i)]
- *External emergency transfer* refers to an emergency relocation of a tenant to another unit where the tenant would be considered a new applicant, meaning the tenant must undergo an application process in order to reside in the new unit. [24 CFR 5.2005(1)(e)(ii)]
- *Safe unit* refers to a unit that the victim of domestic violence, dating violence, sexual assault, or stalking believes is safe. [24 CFR 5.2005(1)(e)(iii)]

When a SLHA public housing resident communicates an emergency transfer request due to reasons that fall under VAWA, the resident may make an internal emergency transfer under VAWA when a safe unit is immediately available. The VAWA Coordinator will process the request as follows [24 CFR 5.2005(e)(6)]:

⁵ PHAs administering Public Housing, HCV (including PBV), and Section 8 Mod Rehab must ensure that their Emergency Transfer Plan covers these programs. PIH Notice 2017-08.

1. The VAWA Coordinator will ask the participant to provide contact information at which the victim feels safe receiving communication and the manner of communication (e.g. phone call, email, U.S. Mail).
2. The VAWA Coordinator will provide the participant with the *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* form (Form HUD-5382) and *Notice of Occupancy Rights* attached to this Plan, along with a written request for documentation that includes the following:
 - a deadline of fourteen (14) business days following receipt of the request;
 - description of the three forms of acceptable documentation; and
 - instructions on where and to whom the documentation must be submitted.
3. The VAWA Coordinator will give the resident the list of domestic violence advocacy organizations attached to this Emergency Transfer Plan.
4. The VAWA Coordinator will review the request once the completed Form HUD-5382 or other acceptable documentation has been submitted and determine whether the case falls under VAWA definitions.
5. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.
6. If the case falls under VAWA definitions, the VAWA Coordinator will email SLHA's Contract and Compliance Specialist and request a list of available units for which the household is eligible.
7. The Contract and Compliance Specialist will identify all units that may be available in SLHA's database and contact each property to confirm unit availability. Once confirmed, the Contract and Compliance Specialist will email the list of available units (if any) to the VAWA Coordinator.
8. If a safe unit is immediately available, the VAWA Coordinator will contact the participant by phone (and confirm in writing by email or U.S. Mail if safe to do so), the address for the first available unit.

9. The VAWA Coordinator will contact the public housing site of the available unit to arrange a date and time for the resident to view the unit and complete any paperwork necessary to complete the transfer.
10. If the resident accepts the unit offered, the VAWA Coordinator will confirm by obtaining the resident's signature of acceptance on a unit offer letter. The VAWA Coordinator will then email the signed unit acceptance to both public housing sites (former unit and new unit) to SLHA's Contract and Compliance Specialist.
11. Upon receipt of the signed unit acceptance, the new public housing site will send an email to the old public housing site and SLHA's Contract and Compliance Specialist, stating the exact move-in date.
12. The resident must agree to abide by the terms and conditions that govern occupancy in the unit to which the resident has been transferred.
13. SLHA may be unable to transfer a resident to a particular unit if the resident has not or cannot establish eligibility for that unit. For example, a non-elderly individual will not be eligible to transfer to an elderly only property.
14. If the resident reasonably believes a proposed transfer would not be safe, the resident may request a transfer to a different unit subject to unit availability and the following:
 - a. SLHA will limit emergency unit transfer offers to three (3) unit offers unless the individual submits supporting documentation of "good cause" to reject the unit offer.
 - b. "Good cause" is defined as a situation in which an individual is willing to move but is unable to do so at the time of the unit offer, or the individual demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the individual's race, color, national origin, etc.
15. If the resident declines a unit offered, the VAWA Coordinator will confirm by obtaining the resident's signature declining on the unit offer letter. The VAWA Coordinator will then email the signed unit decline to both public housing sites (former unit and new unit) and to SLHA's Contract and Compliance Specialist.

16. SLHA will not enter information provided under this Plan into any shared database or disclose information to any other entity or individual. However, the VAWA Coordinator will retain VAWA documentation in a separate case file for a period of three (3) years after completion of the request, including a record of each request made under this Plan and the outcomes of each request. [24 CFR 5.2005(e)(12)]

If a Safe Unit Is Not Immediately Available [24 CFR 5.2005(e)(6)]: If SLHA does not have a safe unit immediately available for an Internal Emergency Transfer, the resident will be placed on the Emergency Transfer Waitlist. Residents on the Emergency Transfer Waitlist will take precedence over non-VAWA transfers and new applicants. The resident may also request an External Emergency Transfer. A resident may choose to pursue both an Internal and an External Transfer at the same time. [24 CFR 5.2005(e)(8)]

If External Emergency Transfer is Requested [24 CFR 5.2005(e)(7)]: The VAWA Coordinator will take the following steps to assist the tenant with an External Emergency Transfer:

1. Provide the resident with a list of other SLHA-assisted properties. The list will include unit sizes, preferences, and contact information.
2. At the tenant's request, SLHA will also provide a list of non-SLHA assisted properties and/or housing providers that includes unit size, preferences, and contact information obtained from <https://hopeforseniorsstl.org/case-management/senior-housing-list/>
3. At the tenant's request, the VAWA Coordinator will assist the resident by contacting one or more of the housing providers.
4. At the tenant's request, the VAWA Coordinator will share documentation from the resident's current file in order to expedite the application process to a new unit, as long as the resident provides written consent to do so, and applicable confidentiality requirements are met.

Priority of VAWA Emergency Transfers in Public Housing [24 CFR

5.2005(e)(3)]: The order for priority of VAWA Emergency Transfers will be as follows (subject to the requirements of HUD Section 504 discussed below):

- **First priority:** Internal Emergency Transfers. Priority among Internal Emergency Transfers will be evaluated on a case-by-case basis if any conflicts arise.
- **Second priority:** External Emergency Transfers.
- **Third priority:** Internal Special Transfers (i.e. non-VAWA).

Accessible Units in Public Housing: In order to meet the requirements of HUD Section 504 to maximize use of accessible units by those who need accessibility features, SLHA will apply the following order of priority for Accessible Units only:

- **First priority:** current occupant of the property who needs the accessibility features of the vacant unit.
- **Second priority:** eligible qualified individual on the waiting list who needs accessible features.
- **Third priority:** individuals without disabilities who need an emergency transfer under VAWA.

Part 5: Safety and Security of Program Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, applicants and participants are urged to take all reasonable precautions to be safe. SLHA will provide information to applicants and participants to obtain assistance for their security and safety with the following disclaimer:

St. Louis Housing Authority is not responsible for and does not operate, control, or endorse, any of the below listed providers or websites. The information is provided merely as a resource.

Applicants and participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Applicants and participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE or visit the online hotline at <http://ohl.rainn.org/online/>.

Applicants and participants who are or have been victims of stalking seeking help may visit the National Center of Victims of Crime's Stalking Resources Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Local Resources:

Domestic/Sexual Violence Crisis Hotlines

ALIVE	314.993.2777
Safe Connections	314.531.2003
YWCA Metro St. Louis	314.531.7273

Domestic Violence Shelters

A Safe Place	636.232.2301 (Jefferson County)
Bridgeway Behavioral Health	636.224.1800 (St. Charles)
Kathy J. Weinman Shelter	314.423.1117 (St. Louis County)
Saint Martha's Hall	314.533.1313
The Women's Safe House	314.772.4535

Legal Assistance and Courts

St. Louis City Adult Abuse Office	314.622.4434
St. Louis County Adult Abuse Office	314.615.4725

Jefferson County Courthouse	636.797.5060
St. Charles County Courthouse	636.949.3080
Legal Assistance of Eastern Missouri	314.532.4200

Other support services and programs

Crime Victim Center	314.652.3623
Family Forward – ROW Programs	314.588.8300
Life Source Consultant	314.524.0686
Lydia’s House	314.771.4411
Missouri Coalition Against Domestic & Sexual Violence (MCADSV)	573.634.4161
Pathways to Brightness	314.328.4348

St. Louis Housing Authority

Notice of Occupancy Rights under the Violence Against Women Act⁶

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.⁷ The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that **Public Housing** is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under Public Housing, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under Public Housing, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights **under Public Housing** solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Ref. Form HUD-5380
(12/2016)

⁶ Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

⁷ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Removing the Abuser or Perpetrator from the Household

St. Louis Housing Authority may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking. If St. Louis Housing Authority chooses to remove the abuser or perpetrator, St. Louis Housing Authority may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, St. Louis Housing Authority must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA or find alternative housing.

In removing the abuser or perpetrator from the household, St. Louis Housing Authority must follow Federal, State, and local eviction procedures. In order to divide a lease, St. Louis Housing Authority may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, St. Louis Housing Authority may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, HP may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, St. Louis Housing Authority may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If St. Louis Housing Authority does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, St. Louis Housing Authority may ask you for such documentation, as described in the documentation section below.
- (2) You expressly request the emergency transfer.** St. Louis Housing Authority may choose to require that you submit a form or may accept another written or oral request.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

St. Louis Housing Authority will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

St. Louis Housing Authority's emergency transfer plan provides further information on emergency transfers, and St. Louis Housing Authority must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

St. Louis Housing Authority can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from St. Louis Housing Authority must be in writing, and St. Louis Housing Authority must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. St. Louis Housing Authority may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to St. Louis Housing Authority as documentation. It is your choice which of the following to submit if St. Louis Housing Authority asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by St. Louis Housing Authority with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.

Ref. Form HUD-5380
(12/2016)

- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, “professional”) from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that St. Louis Housing Authority has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, St. Louis Housing Authority does not have to provide you with the protections contained in this notice. If St. Louis Housing Authority receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), St. Louis Housing Authority has the right to request that you provide third-party documentation within thirty (30) calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, St. Louis Housing Authority does not have to provide you with the protections contained in this notice.

Confidentiality

St. Louis Housing Authority must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

St. Louis Housing Authority must not allow any individual administering assistance or other services on behalf of St. Louis Housing Authority (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law. St. Louis Housing Authority must not enter your information into any shared database or disclose your information to any other entity or individual. St. Louis Housing Authority, however, may disclose the information provided if:

- You give written permission to St. Louis Housing Authority to release the information on a time limited basis.

Ref. Form HUD-5380
(12/2016)

- St. Louis Housing Authority needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires St. Louis Housing Authority or your landlord to release the information.

VAWA does not limit St. Louis Housing Authority's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, St. Louis Housing Authority cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if St. Louis Housing Authority can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

- 1) Would occur within an immediate time frame, and
- 2) Could result in death or serious bodily harm to other tenants or those who work on the property.

If St. Louis Housing Authority can demonstrate the above, St. Louis Housing Authority should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with the **St. Louis FHEO Field Office, 1222 Spruce Street, Room 3.203, St. Louis, MO 63103, (314)418-5400.**

For Additional Information

You may view a copy of HUD's final VAWA rule at <https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>

Additionally, St. Louis Housing Authority must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact St. Louis Housing Authority General Counsel at (314) 286-4231.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact Legal Services of Eastern Missouri, 4232 Forest Park Avenue, St. Louis, MO 63108, (314) 534-4200 or 1-800-444-0514.

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact RAINN (Rape, Abuse & Incest National Network) at 1-800-656-HOPE (1-800-656-4673).

Victims of stalking seeking help may contact the Stalking Resource Center at 1-855-4-VICTIM (1-855-484-2846).

Attachment: Certification form HUD-5382

**CERTIFICATION OF
DOMESTIC VIOLENCE,
DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: _____

2. Name of victim: _____

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____

6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2023

Chapter	Current	Change/Addition/Comment	Page
<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.1 Overview</p>	<p>The Violence against Women Act (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault or stalking who are applying for or receiving assistance under the public housing program.</p>	<p>The Violence Against Women Act (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault or stalking who are applying for or are the beneficiaries of assistance under a covered HUD program, such as SLHA's public housing program. Notwithstanding, the title of the statute, the protections under the statute cover victims regardless of sex, gender identity, or sexual orientation. Consistent with the nondiscrimination and equal opportunity requirements of 24 CFR 5.105(a), victims cannot be discriminated against on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability or age. SLHA's public housing program operates consistent with HUD's Equal Access Rule, which requires that HUD-assisted and HUD-insured housing be made available to all otherwise eligible individuals and families regardless of actual or perceived sexual orientation, gender identity or marital status.</p>	<p>4-6</p>
<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p>	<p>As used in VAWA:</p> <ul style="list-style-type: none"> Dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship 	<p><u>HUD Notice PIH 2017-08 revised definitions of terms defined in the VAWA Final Rule. All definitions will be updated to reflect 24 CFR 5.2003.</u></p> <p>As used in VAWA</p> <ul style="list-style-type: none"> <i>Actual and imminent threat</i> refers to a physical danger that is real, would occur within an immediate time frame, and 	<p>4-6</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2023

<p>4.6.2 Definitions [24 CFR 5.2003]</p>	<ul style="list-style-type: none"> • Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction • Immediate family member means, with respect to a person: <ul style="list-style-type: none"> • A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or • Any other person living in the household of that person and related to that person by blood and marriage • Stalking means: <ul style="list-style-type: none"> • To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or • To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and • In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate 	<p>could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: The duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.</p> <ul style="list-style-type: none"> • <i>Affiliated individual</i>, with respect to an individual, means: <ul style="list-style-type: none"> ○ A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or ○ Any individual, tenant, or lawful occupant living in the household of that individual. • <i>Bifurcate</i> means to divide a lease as a matter of law, subject to the permissibility of such process under the requirements of the applicable HUD-covered program and State or local law, such that certain tenants or lawful occupants can be evicted or removed and the remaining tenants or lawful occupants can continue to reside in the unit under the same lease requirements or as may be revised depending upon the eligibility for 	
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	<p>family of that person, or (3) the spouse or intimate partner of that person</p>	<p>continued occupancy of the remaining tenants and lawful occupants.</p> <ul style="list-style-type: none">• <i>Covered housing provider</i> refers to the individual or entity under a covered housing program that has responsibility for the administration and/or oversight of VAWA protections and includes PHAs, sponsors, owners, mortgagors, managers, State and local governments or agencies thereof, nonprofit or for-profit organizations or entities. The program-specific regulations for the covered housing programs identify the individual or entity that carries out the duties and responsibilities of the covered housing provider as set forth in part 5, subpart L. For any of the covered housing programs, it is possible that there may be more than one covered housing provider; that is, depending upon the VAWA duty or responsibility to be performed by a covered housing provider, the covered housing provider may not always be the same individual or entity.• <i>Dating violence</i> means violence committed by a person:<ul style="list-style-type: none">○ Who is or has been in a social relationship of a romantic or intimate nature with the victim; and○ Where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the	
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		<p>relationship; the type of relationship; and the frequency of interaction between the persons involved in the relationship.</p> <ul style="list-style-type: none">• <i>Domestic violence</i> includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.• <i>Sexual assault</i> means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.	
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		<ul style="list-style-type: none"> • <i>Stalking</i> means engaging in a course of conduct directed at a specific person that would cause a reasonable person to: fear for the person's individual safety or the safety of others; or suffer substantial emotional distress. 	
Chapter 4 Program Administration 4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality 4.6.3 Notification	Notification [24 CFR 5.2305(a)]	Notification [24 CFR 5.2005(a)]	4-6
Chapter 4 Program Administration 4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality 4.6.3.2 Notification to Applicants and Tenants	SLHA will provide all residents with information about VAWA at the time of admission and at annual reexamination, including Form HUD-5380, Notice of Occupancy Rights under the Violence Against Women Act, and Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Alternate Documentation.	SLHA will provide each of its applicants and tenants the following information regarding VAWA (i) at the time the applicant is denied assistance or admission to SLHA's public housing program; (ii) at the time an individual is admitted to SLHA's public housing program; and (iii) with any notification of termination of lease, tenancy, or assistance: (i) Form HUD-5380, Notice of Occupancy Rights under the Violence Against Women Act, which explains the VAWA protections, including the right to confidentiality, and any limitations on those protections; and	4-6

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		<p>(ii) Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Alternate Documentation, which is the certification form approved by HUD to be completed by the victim to document an incident of domestic violence, dating violence, sexual assault, or stalking.</p>	
<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.4 Prohibited Basis for Denial or Termination of Assistance or Eviction [24 CFR 5.2005(b)]</p>		<p>An applicant for assistance or tenant assisted under SLHA's public housing program will not be denied admission to, denied assistance under, terminated from participation in, or evicted from their housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation or occupancy.</p> <p>A tenant in SLHA public housing will not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking if:</p> <p>(i) The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and</p> <p>(ii) The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence,</p>	<p>4-7</p>

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		<p>dating violence, sexual assault, or stalking.</p>	
<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.5 Request for Documentation</p>	<p>4.6.4.1 Overview</p> <p>When SLHA is presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, stalking, or criminal activity related to any of these forms of abuse, it may request that the individual making the claim document the abuse. Any request for documentation will be in writing, and the individual will be allowed at least 14 business days after receipt of the request to submit the documentation. The individual may satisfy SLHA's request by providing any one of the following three forms of documentation:</p> <ul style="list-style-type: none"> • A completed and signed HUD-approved certification form (HUD-50066, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which will include the name of the perpetrator • A federal, state or local police report or court record • Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of such abuse. This person may be an employee, agent or volunteer of a victim service provider, an attorney or a medical professional. The person signing the 	<p>If an applicant to or tenant in SLHA's public housing program represents to SLHA that the individual is a victim of domestic violence, dating violence, sexual assault, or stalking entitled to the protections or remedies under VAWA, SLHA may request that the applicant or tenant submit the following specified documentation to SLHA. Any request by SLHA for documentation will be in writing, and the individual will be allowed fourteen (14) business days after receipt of the request to submit the documentation.</p> <p>The individual may satisfy SLHA's request by providing any one of the following permissible forms of documentation. It is at the discretion of the applicant or tenant which one of the forms of documentation to submit:</p> <ol style="list-style-type: none"> 1) A completed and signed Form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Alternate Documentation that: <ol style="list-style-type: none"> (i) States the applicant or tenant is a victim of domestic violence dating violence, sexual assault or stalking; 	<p>4-7</p>

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	<p>documentation will attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim will also sign the documentation</p> <p>SLHA will not require third party documentation in addition to certification, except as specified in Section 4.6.2. All requests for documentation of VAWA issues specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation will be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline. SLHA may extend the deadline upon request.</p>	<ul style="list-style-type: none"> (ii) States the incident of domestic violence, dating violence, sexual assault, or stalking meets the applicable definition under VAWA; and (iii) Includes the name of the individual who committed the domestic violence, dating violence, sexual assault or stalking <i>if</i> the name is known <i>and</i> safe to provide. <p>2) A document:</p> <ul style="list-style-type: none"> (i) signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively "professional") from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of such abuse. (ii) signed by the applicant or tenant; and (iii) that specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under VAWA, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under VAWA ;or <p>3) A record of a Federal, State, tribal, territorial or local law enforcement agency, court or administrative agency.</p>	
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		<p>SLHA will not require third party documentation in addition to certification, except as specified in its Emergency Transfer Plan. All requests for documentation of VAWA issues specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation will be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline. SLHA may extend the deadline upon request.</p>	
<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.5.1 Conflicting Documentation [24 CFR 5.2007(b)(2)]</p>	<p>4.6.4.2 Conflicting Documentation [24 CFR 5.2007(e)] If presented with conflicting certification documents (two or more forms HUD-50066) from members of the same household, SLHA will attempt to determine which is the true victim by requiring each of them to provide third party documentation. SLHA will honor any court orders issued to protect the victim or to address the distribution of property.</p>	<p>If SLHA receives documentation under the above section that contains conflicting information (including certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator) SLHA may require an applicant or tenant to submit third-party documentation, as described in the section above, within thirty (30) calendar days of the date of the request for the third-party documentation.</p>	<p>4-8</p>

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<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.5.2 Discretion to Require No Documentation [24 CFR 5.2007(b)(1)(iv) and (b)(3)]</p>	<p>4.6.4.3 Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]</p> <p>SLHA may provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse. If SLHA accepts an individual's statement or other corroborating evidence of domestic violence, dating violence, sexual assault, or stalking, SLHA will document acceptance of the statement or evidence in the individual's file.</p>	<p>SLHA may, at its discretion, require no documentation or may accept an individual's own statement or other corroborating evidence—i.e., without requiring any other form of documentation. If SLHA accepts an individual's statement or other corroborating evidence of domestic violence, dating violence, sexual assault, or stalking, SLHA will document acceptance of the statement or evidence in the individual's file.</p>	<p>4-8</p>
<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.5.3 Failure to Provide Documentation [24 CFR 5.2007(2)(i)]</p>	<p>4.6.4.4 Failure to Provide Documentation [24 CFR 5.2007(c)]</p> <p>In order to deny relief for protection under VAWA, SLHA will provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as SLHA may allow, SLHA may deny relief for protection under VAWA.</p>	<p>If an applicant or tenant does not provide documentation requested by SLHA under this section within the timeframe provided, nothing in VAWA limits SLHA's authority to (A) deny admission to or assistance under SLHA's public housing program, or to terminate the lease, tenancy or participation in SLHA's public housing program.</p>	<p>4-8</p>

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<p>Chapter 4 Program Administration</p> <p>4.6 Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality</p> <p>4.6.6 Confidentiality [24 CFR 5.2007(c)]</p>	<p>4.6.5 Confidentiality [24 CFR 5.2007(b)(4)]</p> <p>All information provided to SLHA regarding domestic violence, dating violence, sexual assault, or stalking, including the fact that an individual is a victim of such violence or stalking, will be retained in confidence. SLHA will not enter the information into any shared database, will not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and will not provide the information to any other entity or individual, except to the extent that the disclosure is requested or consented to by the individual in writing, required for use in an eviction proceeding, or otherwise required by applicable law. If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, SLHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.</p>	<p>All information provided to SLHA regarding domestic violence, dating violence, sexual assault, or stalking, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, or stalking, will be maintained in strict confidence. SLHA will not enter the information into any shared database will not allow any person within their employ, including contractors, to have access to confidential information unless explicitly authorized by SLHA for reasons that specifically call for these individuals to have access under applicable Federal, State or local law, and will not disclose confidential information to any other entity or individual, except to the extent that the disclosure is 1) requested or consented to by the individual in writing in a time-limited release; 2) required for use in an eviction proceeding or hearing regarding termination of assistance from SLHA's program; or 3) otherwise required by applicable law. If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, SLHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.</p>	<p>4-8</p>
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<p>Chapter 10 Denial of Admission</p> <p>10.2 Prohibited Reasons for Denial of Admission [24 CFR 5.105, 24 CFR 5.2005(b)]</p>	<ul style="list-style-type: none"> Whether or not a qualified applicant is or has been a victim of domestic violence, dating violence or stalking if the applicant is otherwise qualified for assistance (See Chapter 4) 	<p>Whether or not a qualified applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking if the applicant is otherwise qualified for assistance (See Chapter 4)</p>	<p>10-1</p>
<p>Chapter 10 Denial of Admission</p> <p>10.6 Prohibition Against Denial of Assistance to Victims of Domestic Violence, Dating Violence and Stalking</p> <p>10.6.1 Documentation</p> <p>10.6.1.1 Victim Documentation [24 CFR 5.2007]</p>	<p>SLHA will request in writing that the applicant provide documentation supporting the claim in accordance with Section 4.6.4 of this ACOP.</p>	<p>Change reference to: Section 4.6.5 of this ACOP.</p>	<p>10-4</p>

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<p>Chapter 16 Unit Offers</p> <p>16.4 Refusal of Unit Offer with Good Cause</p>	<ul style="list-style-type: none"> The family demonstrates to SLHA's satisfaction that accepting the offer will place a family member's life, health or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders, other court orders, risk assessments related to witness protection from a law enforcement agency, or documentation of domestic violence, dating violence, sexual assault, or stalking in accordance with Section 4.6.4 of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exception. 	<ul style="list-style-type: none"> The family demonstrates that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption. If an applicant represents to SLHA that the individual is a victim of domestic violence, dating violence, sexual assault, or stalking entitled to the protections or remedies under VAWA. SLHA may request that the applicant submit documentation to SLHA in accordance with Section 4.6.5 of this ACOP. 	<p>16-2</p>
<p>Chapter 18.4 Pro-Rated Rent for Mixed Families</p>		<p>Per PIH Notice 2023-03 and 24 CFR 5.520(d)(1), this addition clarifies that the same 24 month limit at ACOP Section 20.6 applies to Mixed Families:</p> <p>Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.</p>	

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<p>Chapter 20.1 Overview</p>	<p>SLHA reexamines each family's income and composition at least annually, and adjusts the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. Annual and interim reexaminations will be processed in a manner that ensures families are given reasonable notice of rent increases. Families will be informed annually of their choice to select either income or flat-based rent. For families who choose flat rents, SLHA will conduct a reexamination of family composition at least annually, and will conduct a reexamination of family income at least once every three years.</p>	<p>Per PIH Notice 2023-03 and 24 CFR 960.253(f) add: However, once SLHA determines that the family is over-income SLHA must follow the documentation and notification requirements set forth in Section 20.6 of this ACOP for Over Income Families.</p>	
<p>Chapter 20.3 Flat Rents</p>	<p>SLHA offers all families the choice of paying income-based rent or flat rent at least annually. For families who choose flat rents, SLHA will conduct a reexamination of family composition at least annually, and will conduct a full reexamination of family income at least once every three years.</p>	<p>Per PIH Notice 2023-03 and 24 CFR 960.253(f) add: However, once SLHA determines that the family is over-income SLHA must follow the documentation and notification requirements set forth in Section 20.6 of this ACOP for Over Income Families.</p>	
<p>Chapter 21 Unit Transfer</p> <p>21.7 Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</p> <p>21.7.1 VAWA Transfer Policy Background</p>	<p>The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.</p>		<p>21-3</p>

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<p>Chapter 21 Unit Transfer</p> <p>21.7 Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</p> <p>21.7.2 Definitions [24 CFR 5.2005(e)]</p>		<p>SEE ATTACHMENT</p> <p>Section will be revised to reference Emergency Transfer Plan</p>	21-4
<p>Chapter 21 Unit Transfer</p> <p>21.7 Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</p> <p>21.7.3 Eligibility for Emergency Transfers</p>	<p>21.7.2 Eligibility for Emergency Transfers</p> <p>A resident who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer, if:</p> <ul style="list-style-type: none"> • The resident reasonably believes that there is a threat of imminent harm from further violence if the resident remains within the same unit. • The resident is a victim of sexual assault, the resident may also be eligible to transfer if the sexual assault occurred on the premises within the 90 calendar-day 	<p>SEE ATTACHMENT</p> <p>Section will be revised to reference Emergency Transfer Plan</p>	21-4

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	<p>period preceding a request for an emergency transfer.</p> <p>Residents who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.</p>		
<p>Chapter 21 Unit Transfer</p> <p>21.7 Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</p> <p>21.7.6 Emergency Transfer Timing and Availability</p> <p>21.7.6.1 Emergency Transfers in Cases Where a Safe Unit Is Not Immediately Available</p>		<p>SEE ATTACHMENT</p> <p>Section will be revised to reference Emergency Transfer Plan</p>	

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<p>Chapter 21 Unit Transfer</p> <p>21.7 Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</p> <p>21.7.6 Emergency Transfer Timing and Availability</p> <p>21.7.6.2 Priority of VAWA Emergency Transfers over Other Categories of Emergency Transfer</p>		<p>SEE ATTACHMENT</p> <p>Section will be revised to reference Emergency Transfer Plan</p>	
<p>Chapter 21 Unit Transfer</p> <p>21.7 Emergency Transfer Policy for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</p> <p>21.7.6 Emergency Transfer Timing and Availability</p> <p>21.7.6.2 Priority of VAWA Emergency Transfers over Other Categories of Emergency Transfer</p> <p>21.7.6.2.1 Accessible Units</p>		<p>SEE ATTACHMENT</p> <p>Section will be revised to reference Emergency Transfer Plan</p>	

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<p>Chapter 22 Lease Terminations</p> <p>22.4 Terminations of Tenancy Related to Domestic Violence, Dating Violence or Stalking</p> <p>22.4.1 Violence Against Women Act (VAWA) Protections against Termination of Tenancy</p>	<p>VAWA provides specific protections against termination of tenancy for victims of domestic violence, dating violence or stalking. Those protections are as follows:</p> <ul style="list-style-type: none"> • Criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking, engaged in by a member of a resident's household or any guest or other person under the resident's control, shall not be cause for termination of tenancy of, occupancy rights of, or assistance to the victim, if the resident or immediate family member of the resident is the victim • Incidents of actual or threatened domestic violence, dating violence, sexual assault, or stalking may not be construed either as serious or repeated violations of the lease by the victim of such violence or as good cause for terminating the tenancy or occupancy rights of the victim of such violence 	<p>VAWA provides specific protections against termination of tenancy for victims of domestic violence, dating violence, sexual assault or stalking. Those protections are as follows:</p> <ul style="list-style-type: none"> • An applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy. • A tenant in a covered housing program may not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking if: <ul style="list-style-type: none"> ○ The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and ○ The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking. 	<p>22-3</p>
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<p>Chapter 22 Lease Terminations</p> <p>22.4 Terminations of Tenancy Related to Domestic Violence, Dating Violence or Stalking</p> <p>22.4.3 Documentation of Abuse</p>	<p>When an individual facing termination of assistance for reasons related to domestic violence, dating violence or stalking claims protection under VAWA, SLHA will request that the individual provide documentation supporting the claim. SLHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice. In such cases, SLHA will document the waiver in the individual's file.</p>	<p>When an individual facing termination of assistance for reasons related to domestic violence, dating violence, sexual assault or stalking claims protection under VAWA, SLHA may request that the applicant or tenant submit documentation to SLHA in accordance with Section 4.6.5 of this ACOP. SLHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice. In such cases, SLHA will document the waiver in the individual's file.</p>	22-4
<p>Chapter 22 Lease Terminations</p> <p>22.4 Terminations of Tenancy Related to Domestic Violence, Dating Violence or Stalking</p> <p>22.4.4 Terminating or Evicting a Perpetrator of</p>	<p>Although VAWA provides protection from termination for victims of domestic violence, it does not provide such protection for perpetrators. VAWA gives SLHA the explicit authority to bifurcate a lease, or remove a household member from a lease.</p> <p>SLHA will bifurcate a family's lease and terminate the tenancy of a family member if SLHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the tenancy of the remaining, non-culpable family members. In making its decision, SLHA will consider all credible evidence,</p>	<p>Although VAWA provides protection from termination for victims of domestic violence, it does not provide such protection for perpetrators.</p> <p>SLHA may bifurcate a lease, or remove a household member from a lease in order to evict, remove, terminate occupancy rights, or terminate assistance to such member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual regardless of</p>	22-4

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<p>Domestic Violence [24 CFR 5.2009]</p>	<p>including, but not limited to, a signed certification or other documentation of abuse submitted to SLHA by the victim.</p> <p>If SLHA does bifurcate the lease and terminate the tenancy of the culpable family member, it will do so in accordance with the lease, applicable law, and the policies in this ACOP. If necessary, SLHA will also take steps to ensure that the remaining family members have a safe place to live during the termination process in accordance with the transfer policies in Chapter 21.</p>	<p>whether that household member is a signatory to the lease and without evicting, removing, terminating or otherwise penalizing a victim of such criminal activity who is also a tenant or lawful occupant.</p> <p>If SLHA bifurcates the lease, it will do so in accordance with the lease, applicable law, and the policies in this ACOP.</p>	
<p>Chapter 22 Lease Terminations</p> <p>22.4 Terminations of Tenancy Related to Domestic Violence, Dating Violence or Stalking</p> <p>22.4.4 Terminating or Evicting a Perpetrator of Domestic Violence [24 CFR 5.2009]</p> <p>22.4.4.1 Reasonable Time to Establish Eligibility Assistance or find Alternative Housing 24 CFR 2.009(b)(2)(i)]</p>	<p style="text-align: center; font-size: 48px; opacity: 0.2; transform: rotate(-30deg);">DRAFT</p>	<p>If SLHA bifurcates a lease as provided in Section 22.4.4, and the individual who was evicted or for whom assistance was terminated was the eligible tenant under SLHA's public housing program, SLHA will provide any remaining tenant or tenants that were not already eligible a period of ninety (90) calendar days from the date of bifurcation of the lease to:</p> <ol style="list-style-type: none"> 1. Establish eligibility for SLHA's public housing program; or 2. Establish eligibility under another covered housing program; or 3. Find alternative housing. <p>However, the 90-day period provided in this section will not be available to a remaining household member if the statutory requirements for SLHA's public housing program prohibit it.</p>	<p>22-4</p>

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2023

		<p>The 90-day period does not apply beyond the expiration of the lease unless expressly permitted by public housing regulations.</p> <p>SLHA may in its discretion extend the 90-day period for an additional sixty (60) days, unless prohibited from doing so by statutory requirements or unless the extended time period would extend beyond the expiration of the lease.</p>	
<p>ACOP Appendix 1</p> <p>Tenant Parking Procedure</p>	SEE ATTACHMENT	SEE ATTACHMENT	Appendix 1-1
<p>ACOP Appendix 2</p> <p>Income Limits</p>		SEE ATTACHMENT	Appendix 2-1

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2023

ACOP Appendix 3 Flat Rent Schedule		SEE ATTACHMENT	Appendix 3-1
ACOP APPENDIX 5 Emergency Transfer Plan		SEE ATTACHMENT	

CURRENT TENANT PARKING PROCEDURE

Attachment 1 **Tenant Parking Procedure**

In order to ensure that tenants are receiving full benefit and use of tenant parking facilities, the St. Louis Housing Authority (SLHA) has implemented a parking sticker policy to govern their use.

The Management Office will be responsible for the issuance and record keeping of parking stickers. A log is to be established and maintained indicating the date of issuance, parking sticker number, name of tenant issued to, driver's license number, telephone number of tenant, the tenant's original signature verifying receipt of parking sticker, car make and model, license plate number and vehicle registration number.

Parking will be on a first come, first served basis. Families may be allowed more than one parking sticker per household if there are a sufficient number of parking spaces at the development.

Parking stickers will be issued to the head of household. In the event the head of household does not own a vehicle but another family member (who is on the lease and resides in the household) has a vehicle, the head of the household can submit an affidavit authorizing that family member to become the recipient of the parking sticker. Tenants must provide the Management Office with a valid driver's license and registration. The driver's license and registration must list the development address as the driver's place of residence.

Once the parking sticker is issued, it should be affixed to the front windshield (bottom left hand corner) where it is visible.

In general, no second parking sticker will be issued to tenants. In the event that a tenant vehicle is sold, stolen, sustains windshield damage, etc., proof will be required in order to receive a second parking sticker (i.e.: bill of sale, police reports, etc.).

Upon request from the head of the household, management staff may issue temporary visitor parking permits to the head of the household only. A temporary permit may be issued for occasions when a visitor requires vehicle parking on the parking facilities overnight or during a resident's new vehicle registration, not to exceed 30 days. The following information must be provided to the Management Office before a temporary permit will be issued:

1. Name of visitor
2. License plate number
3. Make of car
4. Date on which the visitor will be leaving (for the purpose of indicating an expiration date on the temporary permit).

CURRENT TENANT PARKING PROCEDURE

All unauthorized parking vehicles will be subject to issuance of a summons and/or removal of the vehicle from the parking lot at the owners' expense.

Tenants must abide by SLHA rules and regulations regarding the use of SLHA parking facilities. The following guidelines have been established for each development:

1. Parking facilities are solely for the convenience of tenants. The use of the parking facilities by unauthorized persons is prohibited.
2. Parking facilities are only to be used by properly licensed vehicles (license must be lawfully displayed) and are not to be used as a storage lot.
3. Trailers, boats, or commercial vehicles cannot be parked on SLHA property without prior written permission from the Management Office.
4. Maintenance and/or repairs to vehicles must not take place in the parking facilities.
5. Parking facilities will be cleaned on designated days during the month. These days will be determined by each development with prior notification provided. The area must be cleared of vehicles between the hours of 9:00 a.m. to 12:00 p.m. on the day cleaning is to take place.
6. Vehicles shall be parked within designated, striped areas only.
7. Vehicles violating these rules will be subject to removal from the parking area.

Parking is at your own risk. Permission to use parking facilities is a privilege and may be revoked at any time.

CURRENT TENANT PARKING PROCEDURE

ST. LOUIS HOUSING AUTHORITY

Parking Sticker Issuance

Name: _____

Address: _____

Telephone Number: _____

Make: _____

Model: _____

Driver's License Number: _____

License Plate Number: _____

Registration Number: _____

Development Parking Sticker Number: _____

Expiration Date: _____

Resident Signature

Date

Witnessed By/Issued By
(Management Staff Signature)

Date

PROPOSED SLHA RESIDENT PARKING PROCEDURE

Attachment 1 Resident Parking Procedure

To ensure that residents are receiving full benefit and use of resident parking facilities, the St. Louis Housing Authority (SLHA) has implemented a parking sticker policy to govern their use.

The Management Office will be responsible for the issuance and record keeping of parking stickers utilizing the SLHA Parking Sticker Issuance Form. The Management Office will establish and maintain a log for all parking stickers indicating the date of issuance, name of Resident issued to, Guest Name (if applicable for temporary permit), driver's license number (if available), telephone number, vehicle make and model, and license plate number.

Parking will be on a first come, first served basis. There will be no assigned parking spaces. Families may be allowed more than one parking sticker per household if there are a sufficient number of parking spaces available at the development.

Parking stickers will be issued to the Head of Household. In the event the Head of Household does not own a vehicle but another family member (who is on the lease and resides in the household) has a vehicle, the head of the household can authorize that family member to become the recipient of the parking sticker. Residents must provide the Management Office with proof of current registration.

Once the parking sticker is issued, it should be affixed to the front windshield (bottom left-hand corner) where it is visible. Parking stickers must be visible at all times. Parking stickers shall only be issued to current residents and are only valid during the term of a resident's lease. In the event that a Resident's vehicle is sold, stolen, sustains windshield damage, etc., additional documentation will be required in order to receive a second parking sticker (i.e.: bill of sale, police reports, etc.).

Upon request from the Head of Household, Management may issue a temporary parking permit to a visitor not to exceed twenty-one (21) days. The following information must be provided to the Management Office before a temporary parking permit will be issued:

1. Name of visitor
2. License plate number
3. Make and Model of car

Residents must abide by SLHA rules and regulations regarding the use of SLHA parking facilities. The following guidelines have been established for each development:

1. Parking facilities are solely for the convenience of Residents. The use of the parking facilities by unauthorized persons is prohibited.

PROPOSED SLHA RESIDENT PARKING PROCEDURE

2. Parking facilities are not to be used as a storage lot. Any derelict, abandoned, unregistered, hazardous, or unauthorized vehicles may be towed at the owner's expense.
3. Trailers, boats, or commercial vehicles cannot be parked on SLHA property without prior written permission from the Management Office.
4. Maintenance and/or repairs to vehicles is prohibited except for emergency repairs such as changing of a flat tire.
5. Vehicles must be removed at times specified by Management for cleaning and repair of parking facilities as long as proper notification is provided.
6. Vehicles shall be parked within designated, striped areas only. Parking on sidewalks, fire lanes, lawns or any other area not designated for parking is prohibited.
7. Vehicles parked in accessible or handicapped spaces are required to display a current disabled placard or disabled license plates as required by state law.
8. Vehicles violating these rules may be towed at the owner's expense.

THE USE OF ANY PARKING FACILITY IS SOLELY AT THE VEHICLE OWNER'S OWN RISK, AND THE ST. LOUIS HOUSING AUTHORITY ASSUMES NO RESPONSIBILITY OF ANY NATURE WITH RESPECT TO THE VEHICLE OR ITS CONTENTS.

PERMISSION TO USE PARKING FACILITIES IS A PRIVILEGE AND MAY BE REVOKED AT ANY TIME.

PROPOSED SLHA RESIDENT PARKING PROCEDURE

ST. LOUIS HOUSING AUTHORITY

Parking Sticker Issuance Form

CHECK ONE:

Head of Household Other Resident Temporary

Head of Household: _____

Address: _____

Telephone Number: _____

Development: _____

Resident/Guest Name: _____
If applicable

VEHICLE INFORMATION

Make: _____

Model: _____

License Plate Number: _____

Proof of Current Registration Provided Expiration Date: _____

Parking Sticker Number: _____

Expiration Date: _____

Head of Household

Date

Witnessed By/Issued By
Management Staff Signature

Date

Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

SLHA is concerned about the safety of the participants¹ in its programs, and such concern extends to residents who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),² SLHA allows program participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from their current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.³ The ability of SLHA to honor such request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether SLHA has another dwelling unit that is immediately available⁴ tenant for temporary or more permanent occupancy.

There are five parts to this emergency plan:

- Part 1: Eligibility for Emergency Transfers**
- Part 2: Emergency Transfer Request Documentation**
- Part 3: Confidentiality**
- Part 4: Emergency Transfer Timing and Availability**
- Part 5: Safety and Security of Program Participants**

¹ For purposes of this Emergency Transfer Plan, the terms “participant,” “tenant,” “resident,” and “individual” are interchangeable.

² Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

³ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

⁴ For the purposes of this emergency transfer plan, SAHA defines “immediately available” as a vacant unit ready for move-in within a reasonable period of time.

Part 1: Eligibility for Emergency Transfers

As provided in HUD regulations at 24 CFR 5.2005(e)(2), a program participant is eligible for an emergency transfer if **one** of the following applies:

1. The participant is a victim of domestic violence, dating violence, sexual assault, or stalking; or
2. The participant reasonably believes that there is a threat of imminent harm from further violence if the participant remains within the same unit; or
3. If the participant is a victim of sexual assault, and the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

An applicant or participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this Plan and submit it to:

**Attn: VAWA Coordinator
St. Louis Housing Authority
3520 Page Blvd.
St. Louis MO 63106**

or

VAWA@slha.org

Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Eligibility for an emergency transfer does not guarantee continued assistance under the program or a transfer to another covered housing program.

The emergency transfer requirements do not supersede any eligibility or occupancy requirements that may apply under a covered housing program [24 CFR 5.2005(e)(13)].

Part 2: Emergency Transfer Request Documentation

If an applicant or tenant represents to SLHA that they or a member of their household is a victim of domestic violence, dating violence, sexual assault, or stalking entitled to the protections or remedies under VAWA, SLHA may request (but is not required to request), in writing, that the applicant or participant submit to SLHA the documentation described in Section B of this Part 2.

However, SLHA may choose to provide benefits to an individual based solely on the individual's verbal statement or other corroborating evidence. In cases where SLHA decides to rely on such information, SLHA will document, in a confidential manner, the individual's verbal statement or other corroborating evidence.

A. Written Request for Documentation [24 C.F.R. 5.2007(a)(1)]

If SLHA chooses to request an individual to document their claim of domestic violence, dating violence, sexual assault, or stalking, SLHA must make such request in writing and include the following:

- a deadline of fourteen (14) business days following receipt of the request;
- description of the three forms of acceptable documentation, and
- instructions on where and to whom the documentation must be submitted.

SLHA may choose to extend the 14-day period. [24 C.F.R. 5.2007(a)(2)(ii)] In determining whether to do so, SLHA will consider factors that may contribute to the individual's inability to provide the documentation in a timely manner. These factors may include, but are not limited to the following:

- cognitive limitations
- disabilities
- limited English proficiency
- absence from the unit due to hospitalization or time in an emergency shelter
- administrative delays in obtaining police or court records,
- danger of further violence, and
- the individual's need to address health or safety issues.

SLHA will also grant reasonable accommodation for persons with disabilities.

During the 14-day period and any granted extensions, SLHA may not take any adverse actions, such as eviction, termination, or denial against the individual requesting VAWA protection.

However, if an applicant or participant does not provide the documentation requested by SLHA within the 14-day period and any granted extensions, SLHA may:

- Deny admission by the applicant or tenant to the covered housing program;
- Deny assistance under the covered housing program to the applicant or tenant;
- Terminate the participation of the tenant in the covered housing program; or
- Evict the tenant, or a lawful occupant that commits a violation of a lease.

[24 C.F.R. 5.2007(a)(2)(i)]

B. Permissible Documentation [24 C.F.R. 5.2007(b)(1)(i)-(iii)]

The individual may satisfy SLHA's request for documentation by providing any **one** of the following permissible forms of documentation. It is at the discretion of the applicant or participant which one of the forms of documentation to submit:

1. A completed and signed Form HUD-5382, *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* that:
 - States the applicant or tenant is a victim of domestic violence dating violence, sexual assault or stalking;
 - States the incident of domestic violence, dating violence, sexual assault, or stalking meets the applicable definition under VAWA; and
 - Includes the name of the individual who committed the domestic violence, dating violence, sexual assault or stalking **if** the name is known **and** safe to provide.
2. A document that:
 - is signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively "professional") from whom the victim has sought assistance relating to domestic violence,

dating violence, sexual assault, or stalking, or the effects of such abuse;

- is signed by the applicant or tenant; and
 - specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under VAWA, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under VAWA.
3. A record of a Federal, State, tribal, territorial or local law enforcement agency, court or administrative agency.

If the applicant or participant submits a completed and signed *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* (Form HUD-5382), additional third-party documentation is not required, **unless** for the reasons specified below under "Conflicting Documentation." [24 CFR 5.2005(e)(10)]

C. Conflicting Documentation [24 CFR 5.2007(b)(2)]

If SLHA receives documentation under the above section that contains conflicting information, SLHA may require an applicant or participant to submit third-party documentation, as described in Section B (2) and (3) above, within thirty (30) calendar days of the date of the request for the third-party documentation.

Conflicting information includes, but is not limited to:

1. More than one applicant or participant provides documentation to show they are victims of domestic violence, dating violence, sexual assault or stalking, and the information in one person's documentation conflicts with the information in another person's documentation; or
2. Submitted documentation contains information that conflicts with existing information already available to SLHA.

In the circumstance that an individual has submitted conflicting documentation, SLHA may request the individual submit any one of the following to meet the third-party documentation request:

1. A document that:

- is signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively “professional”) from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of such abuse;
 - is signed by the applicant or tenant; and
 - specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection and remedies under VAWA, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, or stalking under VAWA.
2. A record of a Federal, State, tribal, territorial or local law enforcement agency, court or administrative agency.

SLHA must grant the individual thirty (30) calendar days from the date of the request to provide such third-party documentation.

If the individual submits third-party documentation that meets the above criteria and supports the individual's VAWA request, SLHA will **not** require further documentation of the individual's status as a victim of domestic violence, dating violence, sexual assault, or stalking.

If the individual does not submit any third-party documentation within the required time period or submits documentation that does not meet the above criteria, SLHA may, but is not required to, accept that individual's assertion of victim status for the purpose of VAWA protection.

Part 3: Confidentiality

SLHA will keep confidential any information related to the exercise of the applicant's or participant's rights under VAWA, including the fact that they are exercising their rights under VAWA. [24 CFR 5.2007(c)]

SLHA will not allow any individual administering assistance or other services on its behalf (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

SLHA will not enter information provided under this Plan into any shared database or disclose information to any other entity or individual. SLHA, however, may disclose the information provided if:

- The victim gives written permission to SLHA to release the information on a time limited basis.
- SLHA needs to use the information in an eviction or termination proceeding, such as to evict the abuser or perpetrator or terminate the abuser or perpetrator from assistance under this program.
- A law requires SLHA or a landlord to release the information.

SLHA will not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant. [24 CFR 5.2005(e)(4)]

Part 4: Emergency Transfer Timing and Availability

SLHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. SLHA will, however, act as quickly as possible to move a resident who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit.

The emergency transfer requirements do not supersede any eligibility or occupancy requirements that may apply under a covered housing program [24 CFR 5.2005(e)(13)]; therefore, the emergency transfer plan does not guarantee an external transfer to another covered housing program.

At the applicant or participant's request, SLHA will assist with contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this Plan.

A. Housing Choice Voucher (HCV) Program [24 CFR 5.2005(e)(9)]

When a participant communicates an emergency transfer request due to reasons that fall under VAWA, the VAWA Coordinator will handle the request as follows:

1. The VAWA Coordinator will ask the participant to provide contact information at which the victim feels safe receiving communication and the manner of communication (e.g. phone call, email, U.S. Mail).
2. The VAWA Coordinator will provide the individual with the *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* form (Form HUD-5382) and *Notice of Occupancy Rights* attached to this Plan [24 CFR 5.2005], along with a written request for documentation that includes the following:
 - a deadline of fourteen (14) business days following receipt of the request;
 - description of the three forms of acceptable documentation, and
 - instructions on where and to whom the documentation must be submitted.
3. The VAWA Coordinator will review the request once the completed Form HUD-5382 or other acceptable documentation has been submitted and determine whether the case falls under VAWA definitions.

4. If the case falls under VAWA definitions, the VAWA Coordinator will send an e-mail to the assigned Housing Specialist instructing that the individual should be issued a voucher to move, and that issuance of the voucher is time-sensitive.
5. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.
6. The assigned Housing Specialist will expedite completing the recertification (if recertification is necessary) and issue the voucher to the participant.
7. The VAWA Coordinator will inform the participant that local victim service providers may be able to assist them with identifying temporary shelter or other services, such as safety planning, counseling, and emergency funding. The VAWA Coordinator will provide the list of resources in this Plan.
8. When the participant's Request for Tenancy Approval is submitted SLHA will expeditiously inspect the unit, conduct a rent reasonableness determination, and prepare the HAP contract.
9. **Family Break-Up.** The VAWA Coordinator may instruct the Housing Specialist to issue a voucher to facilitate the emergency transfer of the victim without first terminating assistance to the perpetrator. [24 CFR 982.315(a)(2)]
10. SLHA will not enter information provided under this Plan into any shared database or disclose information to any other entity or individual. However, the VAWA Coordinator will retain VAWA documentation in a separate case file for a period of three (3) years after completion of the request, including a record of each request made under this Plan and the outcomes of each request. [24 CFR 5.2005(e)(12)]

No restrictions on moves. SLHA's policies on restricting timing and number of moves **do not** apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and the move is needed to protect the health and safety of the family or family member. [24 CFR 982.354(c)(2)(iii)]

Porting. If the participant requests to move outside of SLHA's jurisdiction, the portability regulations will still apply [PIH Notice 2016-09].

B. Project-Based Voucher (PBV) Program⁵

Unlike families receiving tenant-based assistance under the HCV program, PBV families cannot move with their project-based assistance as the assistance is tied to the unit. However, if a participant makes an emergency transfer request and SLHA's VAWA Coordinator determines the case falls under VAWA definitions, SLHA will offer the participant a transfer to an available Project-Based Voucher unit provided the participant meets any tenant screening or eligibility requirements of the property.

Participants will not be denied admission on the basis or as a direct result that the applicant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

If there is no safe Project-Based Voucher unit immediately available, SLHA will offer the family a tenant-based voucher in accordance with the procedures outlined in this Plan.

C. Public Housing Program

For purposes of this Section:

- *Internal emergency transfer* refers to an emergency relocation of a tenant to another unit where the tenant would not be considered a new applicant, meaning the tenant may reside in a new unit without having to undergo an application process. [24 CFR 5.2005(1)(e)(i)]
- *External emergency transfer* refers to an emergency relocation of a tenant to another unit where the tenant would be considered a new applicant, meaning the tenant must undergo an application process in order to reside in the new unit. [24 CFR 5.2005(1)(e)(ii)]
- *Safe unit* refers to a unit that the victim of domestic violence, dating violence, sexual assault, or stalking believes is safe. [24 CFR 5.2005(1)(e)(iii)]

When a SLHA public housing resident communicates an emergency transfer request due to reasons that fall under VAWA, the resident may make an internal emergency transfer under VAWA when a safe unit is immediately available. The VAWA Coordinator will process the request as follows [24 CFR 5.2005(e)(6)]:

⁵ PHAs administering Public Housing, HCV (including PBV), and Section 8 Mod Rehab must ensure that their Emergency Transfer Plan covers these programs. PIH Notice 2017-08.

1. The VAWA Coordinator will ask the participant to provide contact information at which the victim feels safe receiving communication and the manner of communication (e.g. phone call, email, U.S. Mail).
2. The VAWA Coordinator will provide the participant with the *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* form (Form HUD-5382) and *Notice of Occupancy Rights* attached to this Plan, along with a written request for documentation that includes the following:
 - a deadline of fourteen (14) business days following receipt of the request;
 - description of the three forms of acceptable documentation; and
 - instructions on where and to whom the documentation must be submitted.
3. The VAWA Coordinator will give the resident the list of domestic violence advocacy organizations attached to this Emergency Transfer Plan.
4. The VAWA Coordinator will review the request once the completed Form HUD-5382 or other acceptable documentation has been submitted and determine whether the case falls under VAWA definitions.
5. Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.
6. If the case falls under VAWA definitions, the VAWA Coordinator will email SLHA's Contract and Compliance Specialist and request a list of available units for which the household is eligible.
7. The Contract and Compliance Specialist will identify all units that may be available in SLHA's database and contact each property to confirm unit availability. Once confirmed, the Contract and Compliance Specialist will email the list of available units (if any) to the VAWA Coordinator.
8. If a safe unit is immediately available, the VAWA Coordinator will contact the participant by phone (and confirm in writing by email or U.S. Mail if safe to do so), the address for the first available unit.

9. The VAWA Coordinator will contact the public housing site of the available unit to arrange a date and time for the resident to view the unit and complete any paperwork necessary to complete the transfer.
10. If the resident accepts the unit offered, the VAWA Coordinator will confirm by obtaining the resident's signature of acceptance on a unit offer letter. The VAWA Coordinator will then email the signed unit acceptance to both public housing sites (former unit and new unit) to SLHA's Contract and Compliance Specialist.
11. Upon receipt of the signed unit acceptance, the new public housing site will send an email to the old public housing site and SLHA's Contract and Compliance Specialist, stating the exact move-in date.
12. The resident must agree to abide by the terms and conditions that govern occupancy in the unit to which the resident has been transferred.
13. SLHA may be unable to transfer a resident to a particular unit if the resident has not or cannot establish eligibility for that unit. For example, a non-elderly individual will not be eligible to transfer to an elderly only property.
14. If the resident reasonably believes a proposed transfer would not be safe, the resident may request a transfer to a different unit subject to unit availability and the following:
 - a. SLHA will limit emergency unit transfer offers to three (3) unit offers unless the individual submits supporting documentation of "good cause" to reject the unit offer.
 - b. "Good cause" is defined as a situation in which an individual is willing to move but is unable to do so at the time of the unit offer, or the individual demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the individual's race, color, national origin, etc.
15. If the resident declines a unit offered, the VAWA Coordinator will confirm by obtaining the resident's signature declining on the unit offer letter. The VAWA Coordinator will then email the signed unit decline to both public housing sites (former unit and new unit) and to SLHA's Contract and Compliance Specialist.

16. SLHA will not enter information provided under this Plan into any shared database or disclose information to any other entity or individual. However, the VAWA Coordinator will retain VAWA documentation in a separate case file for a period of three (3) years after completion of the request, including a record of each request made under this Plan and the outcomes of each request. [24 CFR 5.2005(e)(12)]

If a Safe Unit Is Not Immediately Available [24 CFR 5.2005(e)(6)]: If SLHA does not have a safe unit immediately available for an Internal Emergency Transfer, the resident will be placed on the Emergency Transfer Waitlist. Residents on the Emergency Transfer Waitlist will take precedence over non-VAWA transfers and new applicants. The resident may also request an External Emergency Transfer. A resident may choose to pursue both an Internal and an External Transfer at the same time. [24 CFR 5.2005(e)(8)]

If External Emergency Transfer is Requested [24 CFR 5.2005(e)(7)]: The VAWA Coordinator will take the following steps to assist the tenant with an External Emergency Transfer:

1. Provide the resident with a list of other SLHA-assisted properties. The list will include unit sizes, preferences, and contact information.
2. At the tenant's request, SLHA will also provide a list of non-SLHA assisted properties and/or housing providers that includes unit size, preferences, and contact information obtained from <https://hopeforseniorsstl.org/case-management/senior-housing-list/>
3. At the tenant's request, the VAWA Coordinator will assist the resident by contacting one or more of the housing providers.
4. At the tenant's request, the VAWA Coordinator will share documentation from the resident's current file in order to expedite the application process to a new unit, as long as the resident provides written consent to do so, and applicable confidentiality requirements are met.

Priority of VAWA Emergency Transfers in Public Housing [24 CFR

5.2005(e)(3)]: The order for priority of VAWA Emergency Transfers will be as follows (subject to the requirements of HUD Section 504 discussed below):

- **First priority:** Internal Emergency Transfers. Priority among Internal Emergency Transfers will be evaluated on a case-by-case basis if any conflicts arise.
- **Second priority:** External Emergency Transfers.
- **Third priority:** Internal Special Transfers (i.e. non-VAWA).

Accessible Units in Public Housing: In order to meet the requirements of HUD Section 504 to maximize use of accessible units by those who need accessibility features, SLHA will apply the following order of priority for Accessible Units only:

- **First priority:** current occupant of the property who needs the accessibility features of the vacant unit.
- **Second priority:** eligible qualified individual on the waiting list who needs accessible features.
- **Third priority:** individuals without disabilities who need an emergency transfer under VAWA.

Part 5: Safety and Security of Program Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, applicants and participants are urged to take all reasonable precautions to be safe. SLHA will provide information to applicants and participants to obtain assistance for their security and safety with the following disclaimer:

St. Louis Housing Authority is not responsible for and does not operate, control, or endorse, any of the below listed providers or websites. The information is provided merely as a resource.

Applicants and participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Applicants and participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE or visit the online hotline at <http://ohl.rainn.org/online/>.

Applicants and participants who are or have been victims of stalking seeking help may visit the National Center of Victims of Crime's Stalking Resources Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Local Resources:

Domestic/Sexual Violence Crisis Hotlines

ALIVE	314.993.2777
Safe Connections	314.531.2003
YWCA Metro St. Louis	314.531.7273

Domestic Violence Shelters

A Safe Place	636.232.2301 (Jefferson County)
Bridgeway Behavioral Health	636.224.1800 (St. Charles)
Kathy J. Weinman Shelter	314.423.1117 (St. Louis County)
Saint Martha's Hall	314.533.1313
The Women's Safe House	314.772.4535

Legal Assistance and Courts

St. Louis City Adult Abuse Office	314.622.4434
St. Louis County Adult Abuse Office	314.615.4725

Jefferson County Courthouse	636.797.5060
St. Charles County Courthouse	636.949.3080
Legal Assistance of Eastern Missouri	314.532.4200

Other support services and programs

Crime Victim Center	314.652.3623
Family Forward – ROW Programs	314.588.8300
Life Source Consultant	314.524.0686
Lydia’s House	314.771.4411
Missouri Coalition Against Domestic & Sexual Violence (MCADSV)	573.634.4161
Pathways to Brightness	314.328.4348

St. Louis Housing Authority

Notice of Occupancy Rights under the Violence Against Women Act⁶

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.⁷ The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that **Public Housing** is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under Public Housing, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under Public Housing, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights **under Public Housing** solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Ref. Form HUD-5380
(12/2016)

⁶ Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

⁷ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Removing the Abuser or Perpetrator from the Household

St. Louis Housing Authority may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking. If St. Louis Housing Authority chooses to remove the abuser or perpetrator, St. Louis Housing Authority may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, St. Louis Housing Authority must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA or find alternative housing.

In removing the abuser or perpetrator from the household, St. Louis Housing Authority must follow Federal, State, and local eviction procedures. In order to divide a lease, St. Louis Housing Authority may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, St. Louis Housing Authority may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, HP may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, St. Louis Housing Authority may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If St. Louis Housing Authority does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, St. Louis Housing Authority may ask you for such documentation, as described in the documentation section below.
- (2) You expressly request the emergency transfer.** St. Louis Housing Authority may choose to require that you submit a form or may accept another written or oral request.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

St. Louis Housing Authority will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

St. Louis Housing Authority's emergency transfer plan provides further information on emergency transfers, and St. Louis Housing Authority must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

St. Louis Housing Authority can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from St. Louis Housing Authority must be in writing, and St. Louis Housing Authority must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. St. Louis Housing Authority may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to St. Louis Housing Authority as documentation. It is your choice which of the following to submit if St. Louis Housing Authority asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by St. Louis Housing Authority with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.

Ref. Form HUD-5380
(12/2016)

- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, “professional”) from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that St. Louis Housing Authority has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, St. Louis Housing Authority does not have to provide you with the protections contained in this notice. If St. Louis Housing Authority receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), St. Louis Housing Authority has the right to request that you provide third-party documentation within thirty (30) calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, St. Louis Housing Authority does not have to provide you with the protections contained in this notice.

Confidentiality

St. Louis Housing Authority must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

St. Louis Housing Authority must not allow any individual administering assistance or other services on behalf of St. Louis Housing Authority (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law. St. Louis Housing Authority must not enter your information into any shared database or disclose your information to any other entity or individual. St. Louis Housing Authority, however, may disclose the information provided if:

- You give written permission to St. Louis Housing Authority to release the information on a time limited basis.

Ref. Form HUD-5380
(12/2016)

- St. Louis Housing Authority needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires St. Louis Housing Authority or your landlord to release the information.

VAWA does not limit St. Louis Housing Authority's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, St. Louis Housing Authority cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if St. Louis Housing Authority can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

- 1) Would occur within an immediate time frame, and
- 2) Could result in death or serious bodily harm to other tenants or those who work on the property.

If St. Louis Housing Authority can demonstrate the above, St. Louis Housing Authority should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with the **St. Louis FHEO Field Office, 1222 Spruce Street, Room 3.203, St. Louis, MO 63103, (314)418-5400.**

For Additional Information

You may view a copy of HUD's final VAWA rule at <https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>

Additionally, St. Louis Housing Authority must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact St. Louis Housing Authority General Counsel at (314) 286-4231.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact Legal Services of Eastern Missouri, 4232 Forest Park Avenue, St. Louis, MO 63108, (314) 534-4200 or 1-800-444-0514.

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact RAINN (Rape, Abuse & Incest National Network) at 1-800-656-HOPE (1-800-656-4673).

Victims of stalking seeking help may contact the Stalking Resource Center at 1-855-4-VICTIM (1-855-484-2846).

Attachment: Certification form HUD-5382

Ref. Form HUD-5380
(12/2016)

**CERTIFICATION OF
DOMESTIC VIOLENCE,
DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: _____

2. Name of victim: _____

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____

6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Statement on FY 2023 Median Family Income Estimates and Income Limits

HUD annually calculates estimates of median family income for every area of the country. These estimates are used to calculate various income limits, which are defined as percentages of median family income, and vary by the number of persons in a household. HUD uses income limits to define low-income status and resulting eligibility for many of its housing assistance programs. For more information, please see the Median Family Income and Income Limits Methodology documents here: https://www.huduser.gov/portal/datasets/il.html#2022_documents.

Since FY 2011, HUD has based its median family income estimates on data from the Census Bureau's American Community Survey (ACS). Since FY 2012, there has been a 3-year lag between the ACS estimates and the fiscal year for which the income limits are in effect. For example, the FY 2022 median family incomes and income limits were based on the ACS 2019 data.

On July 29, 2021, the Census Bureau announced that it would not release standard 1-year estimates from the 2020 American Community Survey (ACS) because of the impacts of the COVID-19 pandemic on data collection, which resulted in the 1-year estimates not meeting the Census Bureau's Statistical Data Quality Standards.¹

The FY 2023 median family incomes and income limits would ordinarily be based on the ACS 2020 estimates. However, because of the lack of 1-year ACS 2020 estimates described above, HUD intends to instead base the FY 2023 median family incomes and income limits on ACS 2021 data. Since 2014, HUD has released median family incomes and income limits in March or April of each year. Because the special tabulations of ACS 2021 data HUD needs for median family income calculations will not be available until early 2023², HUD intends to delay the release of FY 2023 median family incomes and income limits until on or about **May 15, 2023**. Should HUD revise this date, HUD will make a similar announcement on <https://www.huduser.gov/portal/datasets/il.html>.

¹ Please see here for more information on the ACS 2020: <https://www.census.gov/newsroom/press-releases/2021/changes-2020-acs-1-year.html>

² The complete public ACS 2021 data is scheduled for release by December 2022. However, HUD uses special tabulations of the ACS to obtain estimates for its non-standard metropolitan areas. The special tabulations will not be provided to HUD until after the public data have been released.

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #3D

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

Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions

**Administration Plan (Section 8 Housing Choice Program) - Changes
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes**

Flat Rent Comparables (ACOP Appendix #3) – SLHA annually revises the Flat Rent Comparables to adjust rent limits comparable to local area rents. (Attachment 5)

REFERENCE ATTACHMENT 5

Section 6.0 (a) – PHA Plan Update – Plan Elements Revised

Item #1 – Eligibility Selection and Admissions Policies including Deconcentration and Wait List procedure

Wait List Re-Opening Projections for FY 2023

SLHA’s wait list is a pool of applicants that have a need and demand for units by location. By analyzing trends of refusal and acceptance of unit offers, and the number of applicants by site, we can discern which developments are considered most and least desirable. Thus with this information we determine when to open and close our wait lists.

HUD AMP #	SLHA #	Development Name	Management Office Address	Re-opening Wait Lists Projections for FY 2023
AMP 000002	MO1-002	Clinton-Peabody	1401 LaSalle	YES
AMP 000010	MO1-010	James House	4310 St. Ferdinand	YES
AMP 000013B	MO1-013B	Euclid Plaza Apartments	5310 N. Euclid	YES
AMP 000017	MO1-017	West Pine	4490 West Pine	YES
AMP 000019	MO1-019	Parkview Apartments	4451 Forest Park	YES
AMP 000028	MO1-028	Badenhaus & Badenfest	8450 Gast Place	YES
AMP 000034	MO1-034	LaSalle Park	1001 Hickory	YES
AMP 000037	MO1-037	Cochran Plaza	1420 N 10 th	YES
AMP 000038	MO1-038	Armand & Ohio	2947,4951,4957 Armand	NO*
AMP 000038	MO1-038	South Side Scattered Sites	3447 Lafayette	YES
AMP 000041	MO1-041	North Side Scattered Sites	1007 N. Taylor	YES
AMP 000044	MO1-044	Murphy Park I, II & III	1920 Cass	YES
AMP 000047	MO1-047	King Louis Square I & II	1524 South 13 th & 1129 Hickory	YES
AMP 000048	MO1-048	Les Chateaux	1330 Chouteau	YES
AMP 000050	MO1-050	Renaissance Place at Grand I, II & III	1001 N. Compton	YES
AMP 000052	MO1-052	King Louis III	1001 Hickory	YES
AMP 000054	MO1-054	Sr. Living at Ren. Pl.	3217 Martin Luther King	YES
AMP 000055	MO1-055	Gardens at Ren. Pl.	3117 Thomas	YES
AMP 000056	MO1-056	Cahill House	1919 O'Fallon	YES
AMP 000058	MO1-058	Cambridge Heights I & II	703 O'Fallon	YES
AMP 000061	MO1-061	Kingsbury Terrace	5655 Kingsbury	YES
AMP 000062	MO1-062	Sr. Living at Cambridge Heights	728 Biddle	YES
AMP 000063	MO1-063	Arlington Grove	5547 Martin Luther King	YES
AMP 000064	MO1-064	North Sarah I, II & III	1024 North Sarah	YES
AMP 000067	MO1-067	Preservation Square I	1406 N 16 th	NO
		Section 8 Wait List	3520 Page Blvd.	YES

*After all current applicants on the Armand & Ohio wait list have been contacted and the list exhausted it will not be re-opened. Going forward it will be merged with the Southside Scattered Sites Waiting List.

St. Louis Housing Authority

FY 2023 Annual Plan

ATTACHMENT #4

**Section B.1 (c) – PHA Plan Update – Plan Elements Revised
Item 3 – Financial Resources**

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FFY 2023 grants)		
a) Public Housing Operating Fund	12,782,095	PHA Operations
b) Public Housing Capital Fund Grant	8,977,188	Capital Improvements
c) Housing Choice Voucher/VASH Program	55,069,476	Housing Assistance Payments and Administrative Fees
d) MS5-Mainstream 5 Voucher Program	255,144	Housing Assistance Payments
e) EHV-Emergency Housing Voucher	3,600	Housing Assistance Payments
f) Resident Opportunity and Self-Sufficiency Grants (ROSS)	146,588	FFS Coordinator for Public Housing & S8 Program
g) Resident Opportunity and Self-Sufficiency Grants (ROSS)	454,884	Service Coordinator for Public Housing
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		<i>As of 3/31/23</i>
FFY 2015-MO36R00150215	934,892	Replacement Housing
FFY 2016-MO36R00150116	341,960	Replacement Housing
FFY 2016-MO36R00150216	1,699,786	Replacement Housing
FFY 2017-MO36R00150117	265,348	Replacement Housing
FFY 2017-MO36R00150217	1,607,288	Replacement Housing
FFY 2019-MO36P00150119	753,154	Capital Improvements
FFY 2020-MO36P00150120	4,489,139	Capital Improvements
FFY 2021-MO36P00150121	250,676	Capital Improvements
FFY 2021-MO36E00150121	215	Capital Improvements
ROSS 2015-MO001DOJ017A015	5,159	Juvenile Reentry Assistance
ROSS 2020-ROSS201427	122,356	ROSS Service Coordinator
ROSS 2022-ROSS22MO4488	25,300	FSS Coordinator
3. Public Housing Dwelling Rental Income		PHA Operations
4. Other income (list below)		
Interest on Investments	2,484	PHA Operations
Interest on Investments/Fraud Recovery	0	Housing Assistance
Other (Dividends/Insurance Proceeds)	126,800	PHA Operations
Other (Charges to Residents)	199,140	PHA Operations
5. Non-federal sources (list below)		
Interest on Investments	30,000	
Other (Space Rentals)	73,540	
Total resources	91,691,062	

**PROPOSED FLAT RENT COMPARABLES
FY 2023**

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR Increase
							No Increase
							Decrease
							2023 Proposed Flat Rent
James House							
0 bdrm	\$759	\$831	\$796	\$801	\$809	\$598	\$809
1 bdrm	\$814	\$822	\$978	\$1,335	\$1,045	\$636	\$864
West Pine							
1 bdrm	\$1,017	\$1,309	\$1,096	\$1,145	\$1,183	\$636	\$1,067
2 bdrm	\$1,082	\$1,826	\$1,294	\$1,480	\$1,533	\$799	\$1,132
Parkview							
0 bdrm	\$843	\$1,154	\$1,144	\$1,139	\$1,146	\$598	\$893
1 bdrm	\$969	\$1,353	\$1,713	\$1,312	\$1,459	\$636	\$1,019
Kingsbury Terrace							
1 bdrm*	\$524	\$845	\$1,372	\$1,378	\$1,198	\$636	\$524
2 bdrm*	\$616	\$1,368	\$1,336	\$1,424	\$1,376	\$799	\$616
Euclid Plaza							
0 bdrm	\$625	\$796	\$727	\$781	\$768	\$598	\$675
1 bdrm	\$685	\$752	\$737	\$752	\$747	\$636	\$735
2 bdrm	\$824	\$938	\$908	\$908	\$918	\$799	\$874
Badenfest							
1 bdrm	\$564	\$809	\$665	\$751	\$742	\$531	\$614
2 bdrm	\$723	\$602	\$893	\$980	\$825	\$678	\$773
Badenhaus							
0 bdrm	\$603	\$797	\$663	\$787	\$749	\$598	\$653
1 bdrm	\$596	\$738	\$794	\$676	\$736	\$636	\$646
Cochran Plaza							
2 bdrm twnhm	\$959	\$1,154	\$1,132	\$1,248	\$1,178	\$651	\$1,009
3 bdrm twnhm	\$1,069	\$1,444	\$1,523	\$1,376	\$1,448	\$860	\$1,119
4 bdrm twnhm	\$1,128	\$1,814	\$2,206	\$2,047	\$2,022	\$998	\$1,178
5 bdrm twnhm	\$1,264	\$1,910	\$2,055	\$1,710	\$1,892	\$1,151	\$1,314
6 bdrm twnhm	\$1,407	\$2,678	\$2,840	\$2,638	\$2,719	\$1,302	\$1,457
LaSalle Park							
2 bdrm	\$1,054	\$1,317	\$1,310	\$1,302	\$1,310	\$651	\$1,104
3 bdrm	\$1,225	\$1,971	\$1,873	\$1,903	\$1,916	\$860	\$1,275
4 bdrm	\$1,275	\$2,312	\$1,857	\$2,408	\$2,192	\$998	\$1,325
Clinton Peabody							
1 bdrm	\$925	\$1,114	\$910	\$879	\$968	\$514	\$968
2 bdrm	\$1,100	\$1,338	\$978	\$1,319	\$1,212	\$651	\$1,150
3 bdrm	\$1,175	\$1,182	\$1,292	\$1,292	\$1,255	\$860	\$1,225
4 bdrm	\$1,225	\$1,486	\$1,611	\$1,545	\$1,547	\$998	\$1,275
5 bdrm	\$1,275	\$2,248	\$2,673	\$2,474	\$2,465	\$1,151	\$1,325
Lafayette Apartments							
0 bdrm	\$858	\$830	\$1,195	\$1,084	\$1,036	\$598	\$908
1 bdrm	\$915	\$805	\$1,150	\$936	\$964	\$636	\$964
California Gardens							
0 bdrm	\$586	\$727	\$657	\$843	\$742	\$598	\$636
1 bdrm	\$647	\$839	\$775	\$750	\$788	\$636	\$697
Armand & Ohio							
3 bdrm	\$1,062	\$1,515	\$1,419	\$1,623	\$1,519	\$854	\$1,112
5 bdrm twnhm	\$1,275	\$1,809	\$2,101	\$1,837	\$1,916	\$1,143	\$1,325
Lafayette Town							
1 bdrm	\$851	\$927	\$1,084	\$842	\$951	\$532	\$901
2 bdrm	\$1,001	\$1,263	\$1,182	\$1,410	\$1,285	\$674	\$1,051
3 bdrm	\$1,175	\$1,536	\$1,523	\$1,435	\$1,498	\$889	\$1,225
Tiffany Turnkey							
1 bdrm	\$787	\$1,159	\$1,133	\$1,029	\$1,107	\$532	\$837
2 bdrm	\$957	\$1,179	\$1,095	\$980	\$1,085	\$674	\$1,007
Folsom							
2 bdrm	\$624	\$1,006	\$960	\$1,016	\$994	\$670	\$674
3 bdrm	\$1,037	\$1,450	\$1,384	\$950	\$1,261	\$883	\$1,087
4 bdrm	\$1,185	\$1,662	\$1,479	\$1,274	\$1,472	\$1,026	\$1,235
Marie Fanger							
2 bdrm	\$1,061	\$1,321	\$1,237	\$1,185	\$1,248	\$670	\$1,111
3 bdrm	\$1,175	\$1,272	\$1,295	\$1,283	\$1,283	\$883	\$1,225
4 bdrm	\$1,175	\$1,546	\$1,580	\$1,486	\$1,537	\$1,026	\$1,225

**PROPOSED FLAT RENT COMPARABLES
FY 2023**

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR Increase
							No Increase
							Decrease
							2023 Proposed Flat Rent
South Broadway							
3 bdrm	\$1,050	\$1,137	\$1,431	\$1,211	\$1,260	\$889	\$1,100
McMillan Manor							
3 bdrm	\$1,020	\$1,355	\$880	\$840	\$1,025	\$860	\$1,025
4 bdrm	\$1,225	\$1,600	\$1,867	\$1,381	\$1,616	\$998	\$1,275
McMillan Manor II							
3 bdrm	\$1,070	\$1,492	\$1,306	\$1,549	\$1,449	\$854	\$1,120
4 bdrm	\$1,225	\$1,564	\$1,821	\$1,336	\$1,574	\$990	\$1,275
Samuel Shepard							
2 bdrm	\$809	\$1,111	\$1,129	\$888	\$1,043	\$670	\$859
3 bdrm	\$1,050	\$1,235	\$1,067	\$1,240	\$1,181	\$883	\$1,100
4 bdrm	\$1,157	\$1,496	\$1,158	\$1,486	\$1,380	\$1,026	\$1,207
Page Manor							
3 bdrm	\$845	\$932	\$1,033	\$810	\$925	\$860	\$895
4 bdrm	\$990	\$1,496	\$1,499	\$1,582	\$1,526	\$998	\$1,040
Hodiamont							
2 bdrm	\$734	\$1,187	\$1,075	\$905	\$1,056	\$674	\$784
3 bdrm	\$868	\$933	\$968	\$1,031	\$977	\$889	\$918
4 bdrm	\$1,154	\$795	\$1,792	\$865	\$1,151	\$1,034	\$1,151
Towne XV							
3 bdrm	\$1,037	\$1,421	\$1,274	\$1,396	\$1,364	\$863	\$1,087
Cupples							
3 bdrm	\$860	\$1,221	\$774	\$750	\$915	\$883	\$915
4 bdrm	\$1,008	\$1,504	\$1,675	\$1,604	\$1,594	\$1,026	\$1,058
Walnut Park							
3 bdrm	\$845	\$1,052	\$906	\$1,218	\$1,059	\$860	\$895
5 bdrm	\$1,242	\$1,641	\$1,429	\$1,270	\$1,447	\$1,151	\$1,292
Lookaway							
3 bdrm	\$1,045	\$1,218	\$1,368	\$1,318	\$1,301	\$860	\$1,095
4 bdrm	\$1,133	\$1,094	\$1,202	\$1,102	\$1,133	\$998	\$1,133
King Louis Square III							
1 bdrm garden	\$799	\$833	\$847	\$750	\$810	\$531	\$810
3 bdrm twnhm	\$1,100	\$1,986	\$1,914	\$1,670	\$1,857	\$857	\$1,150
4 bdrm twnhm	\$1,125	\$1,980	\$1,602	\$1,704	\$1,762	\$987	\$1,175
Murphy Park I							
2 bdrm garden*	\$964	\$965	\$905	\$989	\$953	\$674	\$964
2 bdrm twnhm*	\$964	\$1,222	\$865	\$1,148	\$1,078	\$651	\$964
3 bdrm garden*	\$1,114	\$1,009	\$807	\$1,459	\$1,092	\$889	\$1,114
3 bdrm twnhm*	\$1,114	\$1,682	\$1,719	\$1,711	\$1,704	\$860	\$1,114
4 bdrm twnhm*	\$1,243	\$2,076	\$2,049	\$2,487	\$2,204	\$998	\$1,243
5 bdrm twnhm - PH**	\$1,375	\$2,572	\$2,363	\$2,628	\$2,521	\$1,151	\$1,425
6 bdrm twnhm - PH**	\$1,375	\$2,181	\$2,440	\$2,422	\$2,348	\$1,302	\$1,425
Murphy Park II							
2 bdrm garden*	\$902	\$935	\$1,040	\$1,019	\$998	\$674	\$952
2 bdrm twnhm*	\$902	\$1,222	\$865	\$1,148	\$1,078	\$651	\$952
3 bdrm garden*	\$992	\$1,711	\$1,581	\$1,768	\$1,687	\$889	\$1,042
3 bdrm twnhm*	\$1,027	\$834	\$1,055	\$975	\$955	\$860	\$955
4 bdrm twnhm*	\$1,204	\$2,010	\$1,516	\$1,790	\$1,772	\$998	\$1,254
Murphy Park III							
2 bdrm garden*	\$872	\$960	\$1,031	\$1,040	\$1,010	\$674	\$872
2 bdrm twnhm*	\$880	\$906	\$1,252	\$1,460	\$1,206	\$651	\$880
3 bdrm garden*	\$946	\$919	\$879	\$1,076	\$958	\$889	\$946
3 bdrm twnhm*	\$946	\$1,676	\$1,711	\$1,768	\$1,718	\$860	\$946
4 bdrm twnhm - PH**	\$1,272	\$1,907	\$1,939	\$2,092	\$1,979	\$998	\$1,322
5 bdrm twnhm - PH**	\$1,415	\$2,345	\$2,388	\$2,670	\$2,468	\$1,151	\$1,465
6 bdrm twnhm - PH**	\$1,431	\$2,656	\$1,883	\$3,359	\$2,633	\$1,302	\$1,481
Renaissance PI @ Grand							
1 bdrm garden*	\$708	\$795	\$800	\$812	\$802	\$532	\$708
2 bdrm garden*	\$849	\$1,009	\$1,075	\$1,204	\$1,096	\$674	\$849
2 bdrm twnhm*	\$849	\$972	\$1,137	\$1,217	\$1,109	\$651	\$849
3 bdrm twnhm - PH**	\$1,110	\$1,031	\$1,777	\$1,078	\$1,295	\$860	\$1,160
4 bdrm twnhm - PH**	\$1,175	\$2,449	\$2,024	\$1,286	\$1,920	\$998	\$1,225
5 bdrm twnhm - PH**	\$1,324	\$2,050	\$1,772	\$2,059	\$1,960	\$1,151	\$1,374

**PROPOSED FLAT RENT COMPARABLES
FY 2023**

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR
							Increase
							No Increase
							Decrease
							2023 Proposed Flat Rent
Renaissance PI @ Grand II							
1 bdrm garden*	\$708	\$795	\$800	\$812	\$802	\$532	\$708
2 bdrm garden*	\$830	\$1,009	\$1,075	\$1,204	\$1,096	\$674	\$830
2 bdrm twnhm*	\$830	\$972	\$1,137	\$1,217	\$1,109	\$651	\$830
3 bdrm twnhm*	\$959	\$1,031	\$1,777	\$1,078	\$1,295	\$860	\$959
4 bdrm twnhm - PH**	\$1,175	\$2,449	\$2,024	\$1,286	\$1,920	\$998	\$1,225
5 bdrm twnhm - PH**	\$1,324	\$2,050	\$1,772	\$2,059	\$1,960	\$1,151	\$1,374
Renaissance PI @ Grand III							
1 bdrm garden*	\$658	\$795	\$800	\$812	\$802	\$532	\$658
2 bdrm garden*	\$772	\$1,009	\$1,075	\$1,204	\$1,096	\$674	\$772
2 bdrm twnhm*	\$823	\$972	\$1,137	\$1,217	\$1,109	\$651	\$823
3 bdrm twnhm*	\$948	\$1,031	\$1,777	\$1,078	\$1,295	\$860	\$948
4 bdrm twnhm - PH**	\$1,210	\$2,449	\$2,024	\$1,286	\$1,920	\$998	\$1,260
5 bdrm twnhm - PH**	\$1,279	\$2,050	\$1,772	\$2,059	\$1,960	\$1,151	\$1,329
Gardens @ Renaissance							
1 bdrm garden*	\$744	\$919	\$896	\$848	\$888	\$636	\$744
2 bdrm garden - PH**	\$882	\$1,095	\$878	\$1,209	\$1,061	\$799	\$932
Senior Living @ Renaissnace							
1 bdrm garden*	\$746	\$732	\$910	\$977	\$873	\$636	\$746
2 bdrm garden - PH**	\$922	\$1,034	\$1,124	\$1,003	\$1,054	\$799	\$972
King Louis Square							
1 bdrm garden*	\$531	\$720	\$892	\$795	\$802	\$511	\$531
2 bdrm grdn/twnhm*	\$663	\$1,445	\$1,500	\$1,512	\$1,486	\$651	\$663
3 bdrm grdn/twnhm*	\$777	\$1,504	\$1,504	\$1,459	\$1,489	\$860	\$777
4 bdrm twnhm - PH**	\$1,108	\$1,536	\$2,474	\$2,066	\$2,025	\$998	\$1,158
King Louis Square II (Old Frenchtown)							
1 bdrm garden*	\$572	\$975	\$975	\$781	\$910	\$531	\$572
2 brdm garden*	\$704	\$1,442	\$1,450	\$1,405	\$1,432	\$678	\$704
3 bdrm twnhm*	\$830	\$1,985	\$1,909	\$1,731	\$1,875	\$857	\$830
LesChateaux							
1 bdrm	\$704	\$1,272	\$1,067	\$1,266	\$1,202	\$636	\$804
2 bdrm	\$867	\$1,179	\$1,385	\$1,179	\$1,248	\$799	\$964
Cahill House							
1 bdrm garden*	\$732	\$864	\$716	\$588	\$723	\$636	\$732
2 brdm garden - PH**	\$817	\$971	\$969	\$835	\$925	\$799	\$867
Cambridge Heights I							
1 bdrm garden*	\$583	\$657	\$896	\$912	\$822	\$531	\$583
2 brdm garden*	\$715	\$754	\$515	\$842	\$704	\$678	\$715
2 bdrm twnhm*	\$772	\$845	\$825	\$750	\$807	\$654	\$772
3 bdrm twnhm*	\$843	\$1,386	\$865	\$1,435	\$1,229	\$857	\$843
4 bdrm twnhm - PH**	\$1,175	\$965	\$1,626	\$965	\$1,186	\$987	\$1,186
5 bdrm twnhm - PH**	\$1,240	\$2,183	\$1,553	\$1,433	\$1,723	\$1,147	\$1,290
Cambridge Heights II							
1 bdrm garden*	\$606	\$911	\$657	\$913	\$827	\$531	\$606
2brdm garden*	\$786	\$817	\$733	\$1,117	\$889	\$678	\$786
2 bdrm twnhm*	\$812	\$1,293	\$1,041	\$1,257	\$1,197	\$654	\$812
3 bdrm twnhm*	\$910	\$1,588	\$1,827	\$1,626	\$1,680	\$857	\$910
4 bdrm twnhm - PH**	\$1,224	\$2,202	\$1,887	\$1,940	\$2,010	\$987	\$1,274
5 bdrm twnhm - PH**	\$1,240	\$2,439	\$2,188	\$2,399	\$2,342	\$1,147	\$1,290
Cambridge Senior							
1 bdrm garden*	\$667	\$732	\$910	\$977	\$873	\$636	\$667
2 brdm garden	\$817	\$1,034	\$1,124	\$1,003	\$1,054	\$799	\$867
Arlington Grove							
2 brdm twnhm*	\$749	\$916	\$1,105	\$1,055	\$1,025	\$647	\$749
3 bdrm twnhm*	\$856	\$1,470	\$1,363	\$1,889	\$1,574	\$854	\$856
North Sarah							
1 bdrm garden*	\$640	\$922	\$995	\$959	\$959	\$528	\$640
2 brdm twnhm*	\$749	\$1,406	\$1,437	\$1,249	\$1,364	\$647	\$749
3 bdrm twnhm*	\$855	\$1,712	\$1,628	\$1,690	\$1,677	\$854	\$855
North Sarah II							
1 bdrm garden*	\$600	\$940	\$1,016	\$979	\$978	\$528	\$600
2 brdm twnhm*	\$700	\$1,389	\$1,420	\$1,430	\$1,413	\$647	\$700
3 bdrm twnhm*	\$800	\$1,715	\$1,630	\$1,690	\$1,678	\$854	\$800

**PROPOSED FLAT RENT COMPARABLES
FY 2023**

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	80% FMR
							Increase
							No Increase
							Decrease
							2023 Proposed Flat Rent
North Sarah III							
1 bdrm garden*	\$600	\$1,140	\$1,052	\$883	\$1,025	\$528	\$600
2 brdm twnhm*	\$700	\$1,406	\$1,437	\$1,448	\$1,430	\$647	\$700
3 bdrm twnhm*	\$800	\$1,712	\$1,725	\$1,690	\$1,709	\$854	\$800
Preservation Square I							
2 bdrm garden*	\$808	\$1,049	\$772	\$1,130	\$984	\$678	\$808
2 brdm twnhm*	\$1,005	\$1,550	\$1,255	\$1,556	\$1,454	\$654	\$1,005
3 bdrm garden*	\$1,019	\$1,211	\$1,247	\$1,165	\$1,208	\$888	\$1,019
* Tax Credit Max							
** PH Unit, not Tax Credit							

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #6

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

Item 5 – Operations and Management

Table of HUD Programs Under PHA Management

Program Name	Families Served at Fiscal Year Beginning 10/01/2022	Expected Turnover
Public Housing	2331	417
Section 8 Vouchers	5994	75
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually) Veterans Affairs Supportive Housing Program (VASH)	230	3
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs(list individually)	N/A	N/A

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #7

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

Item 7 – Homeownership

Homeownership Program information is located in Attachment #11-New Activities (page 4)

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #8

Section B.1 (b) – Revisions of PHA Plan Elements

Item 8 - Community Service and Self-Sufficiency Programs:

The Authority’s Admissions and Continued Occupancy Policy (ACOP) contain policies that comply with the requirements of community service and treatment of income changes resulting from welfare program requirements for public housing residents.

ROSS Service Coordinator Program Participation Year Ending (March 31, 2023)			
	Required Participants*	Enrolled Participants	Year Ending Totals
Service Coordinators	≥ last year’s total	190	0 forfeitures 2 removals

FSS Program Participation Year Ending (March 31, 2023)			
	Required Participants*	Enrolled Participants	Year Ending Totals
Public Housing FSS	48	24 total 8 active	1 graduations 6 forfeitures
HCV - FSS	75	41 total 13 active	6 graduates 8 forfeitures

Average monthly escrow: Public Housing- \$228.67 HCV- \$111.66
Average yearly escrow: Public Housing- \$10,307.54 HCV- \$5,503.76

*Each quarter, the total number of new clients must be ≥ 5% of total participants (for ROSS Service Coordinators & FSS-PH **ONLY**. FSS-HCV has a HUD required amount; see above).

Below is a list of community partners working with the Resident Initiatives Department.

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Education/Literacy City of St. Louis Office of Financial Empowerment Financial Literacy	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Gateway EITC Community Coalition Tax Preparation	Open to All	Referrals	Resident Initiatives Department FSS Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Lifewise Financial Stability	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Providence Bank Financial Literacy	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Regions Bank	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy St. Louis Community College Upward Bound College Prep Program	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy St. Louis Public Schools Adult Education/GED	Open to All	Referrals	Via Referrals from Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy TRIO Education Opportunity Centers Education Assistance	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Employment/Job Training Employment Connection Job Development and Placement Services, Employment Training	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Employment/Mentoring Father's Support Center Legal Clinic	Open to All	Referrals	Resident Initiatives Department FSS Coordinators	Public Housing and Housing Choice Voucher Residents

Youth Leadership			Service Coordinators	
Employment/Job Training MET (Missouri Employment Training) Center Employment Training	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Employment/Job Training Urban League Employment Training	Open to All	Walk-Ins	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Employment/Job Training Worknet Employment Training	25 Adults	Site Based Recruitment & Referrals	Resident Initiatives Department Program	Clinton Peabody Public Housing Residents
Family Life Skills Training and Youth Services People's Community Action Agency After School Tutoring Interpersonal Skills Development, Youth Mentoring Computer Usage	Referral Walk-ins	Referrals	PH FSS Coordinator Housing Choice Voucher FSS Coordinator Service Coordinators	Public Housing and Housing Choice Voucher Residents
Family Life Skills Training and Youth Services Places for People Parenting Training and Interpersonal Skills Development	Referrals	Referrals	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Family Life Skills Training University of Missouri Extension Urban Family and Consumer Sciences Programs	Open to All	Referrals	PH FFS Coordinator Housing Choice Voucher FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services Affinia Healthcare Community Healthcare Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
Health and Wellness Services American Lung Association Health Education	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents Housing Choice Voucher Residents
Health and Wellness Services Behavioral Health Response (BHR) Mental Health Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
Health and Wellness Services BJC Hospital/Siteman Cancer Center	Open to All	Referrals	Via referrals	Public Housing

Mammography Screening & Education			Elderly/Disabled Services & FSS Coordinators, Service Coordinators	Elderly/Disabled Residents, Housing Choice Voucher Residents
Health and Wellness Services Gateway to Better Health Health Insurance	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents
Health and Wellness Services Lincoln University Extension Center Education and Health Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services Mental Health America of Eastern MO	Open to All	Referrals	Via referrals FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services Missouri Department of Mental Health Mental Health Services VITAS Healthcare	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents & Family Residents
Health and Wellness Services Missouri Home Health Rehabilitation Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
Health and Wellness Services St. Louis Area Agency on Aging Meals on Wheels	Open to All Elderly/ Disabled Residents	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
Health and Wellness Services St. Louis School of Pharmacy Pharmacy Assistance	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
Health and Wellness Services UMSL School of Nursing Elder Health Care Cambridge Heights, Cahill House, West Pine	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinator	Public Housing Elderly/Disabled Residents
Health and Wellness Services Washington University Goldfarb School of Nursing Elder Health Care Parkview and West Pine Developments	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents & Family Residents
Youth Services Girls, Inc. After School Program	Open to Ages (5-18)	Referrals	Resident Initiatives Department Al Chappelle Community Center	Public Housing Residents Housing Choice Voucher Residents

Youth Services Lewis Place Historical Preservation After School Program	Open to Ages (5-12)	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services People's Community Action Corporation Wyman Center Teen Outreach (Middle School and High School) Program	Open to Ages (12-18) (5-11)	Referrals	Resident Initiatives Department Al Chappelle Community Center Youth & Family Center	Public Housing and Housing Choice Voucher Residents
Youth Services St. Louis Department of Parks, Recreation and Forestry	Open to Ages (6-13)	Referrals	Resident Initiatives Department McMillan Manor Residents	Public Housing Residents
Youth Services St. Louis City Health Department Youth at Risk Food Nutrition Program	Open to Ages (12-18) (5-11)	Referrals	Resident Initiatives Department Al Chappelle Community Center Youth & Family Center	Public Housing and Housing Choice Voucher Residents
Youth Services Urban League Head Start Early Childhood Education	Open to Ages (6 weeks-5 years)	Referrals	Multiple Head Start Locations	Public Housing and Housing Choice Voucher Residents
Youth Services Vision for Children at Risk	Open to Ages (0-8)	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Youth and Family Center	Open to Ages (5-18)	Referrals	Resident Initiatives Department Youth & Family Center	Public Housing and Housing Choice Voucher Residents
Youth Services Deaconess Center for Child Well-Being Advocacy Programs focused on Youth	Open to All	Referrals Walk-Ins Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Arts and Education Foundation Arts Education	Open to All	Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Pianos for People Arts Education	Open to All	Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Gateway Region YMCA Youth Programing	Open to Ages (5-14)	Referrals	Resident Initiatives Department Program	Public Housing Residents

St. Louis Housing Authority
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ATTACHMENT #9

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

Item 11 – Asset Management
Long-term Capital Needs and Strategies

The St. Louis Housing Authority (SLHA) has developed a long-term strategy for operating and maintaining Public Housing assets, which includes the use of third-party management companies and the completion of assessments to prioritize development and modernization activities.

Under the direction of the Director of Operations, the Asset Management Department is responsible for the oversight and administration of privatized management contracts that are responsible for the occupancy, maintenance, and upkeep of the SLHA portfolio. Retained management companies are required to timely report on operations based on key performance indicators. Financial and management indicators are routinely analyzed to assess performance and improve efficiency and operational costs.

In 2021, SLHA retained Bureau Veritas to complete a Physical Needs Assessment (PNA) and Energy Audit (EA) of its entire affordable housing portfolio. The purpose was two-fold: (1) to fully capture the conditions and needs of public housing units and buildings and (2) to serve as a tool when developing a portfolio plan and identifying strategic decisions regarding investments, including the use of Capital Funds, Rental Assistance Demonstration Program, among others. The PNA and EA were both completed in February 2022 and are currently being used to realign the capital fund plan to address needs identified in a targeted manner over the next five years.

The Development and Modernization Department, which administers the Capital Fund Program, utilizes the PNA and EA to accomplish portfolio-wide capital improvement planning, including physical and management improvements. The Department is responsible for tracking progress and updating priorities to adjust for fluctuating program funding. Throughout the portfolio, modernization activities will continue to be undertaken to extend the useful life of building systems of all scales and sizes, including vertical transportation (elevators); mechanical, electrical, and plumbing system upgrades; targeted building exterior repairs and a comprehensive program of parking lot maintenance, site repairs, improvements, and public safety.

SLHA will continue to pursue additional local, state and federal resources to assist with capital needs. In addition to the aforementioned capital fund planning, SLHA has received a draft asset repositioning strategy through a HUD funded consultant. When finalized, this report will guide the agency in creating a repositioning strategy for public housing units utilizing RAD and/or Section 18 applications.

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ATTACHMENT #10

Section B.1 (c) – Deconcentration of Poverty and Income Mixing [24 CFR 903.1 and 903.2]

Deconcentration of poverty and income mixing is a policy that allows PHA’s to bring higher income tenants into lower income developments and lower income tenants into higher income developments. In accordance with 24 CFR Part 903, a Deconcentration and Income Mixing Policy is required as a part of SLHA’s Admissions and Continued Occupancy Policy (ACOP). SLHA’s Deconcentration and Income Mixing Policy is included in Chapter 6 of the ACOP – Tenant Selection, Section 6.4.

Developments subject to the deconcentration of poverty and income mixing requirements are referred to as “covered” developments”. Covered developments include general occupancy (or family) public housing developments.

Developments not subject to the requirement include public housing developments:

- with-fewer than 100 public housing units;
- designated specifically for elderly and/or disabled residents;
- approved for demolition or for conversion to tenant-based assistance; and
- approved mixed-finance developments using HOPE VI or public housing funds.

Table 2 - Average Income of Public Housing Developments includes a list of all SLHA developments, their annual income and if they are subject to the Deconcentration and Income Mixing Requirements.

SLHA will determine the average income of families in all covered developments on an annual basis. SLHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85 percent to 115 percent of the average family income. The results of SLHA’s analysis are summarized on **Table 1 - Average Income of Families in All Covered Developments**.

If covered developments have an average income outside the EIR, SLHA will then determine whether or not these developments are consistent with its local goals and annual plan. If the development is not consistent with local goals and annual plan the SLHA may skip a family on the waiting list to reach another family in an effort that would further the goals of deconcentration.

Deconcentration of Poverty and Income Mixing
Table 1: Average Income of Families in Covered Developments

Development Name	Average Income	Average Income ALL Developments	% of Income	Established Income Range (85% - 115%)
Clinton Peabody	\$7,172	\$11,741	61%	Below
James House	\$8,046	\$11,741	69%	Below
Euclid Plaza	\$8,353	\$11,741	71%	Below
Northside Scattered Sites	\$12,286	\$11,741	105%	Within
Parkview	\$8,729	\$11,741	74%	Below
Southside Scattered Sites	\$9,229	\$11,741	79%	Within
Badenhaus/Badenfest	\$8,363	\$11,741	71%	Below
LaSalle Park	\$11,480	\$11,741	98%	Within
Kingsbury Terrace	\$11,274	\$11,741	96%	Within
ALL Covered Developments	\$9,209	\$11,741	78%	-
ALL DEVELOPMENTS	\$11,741	\$11,741	100%	-

*As of February 28, 2023

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Section B.2

Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers

Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
B.2 (a)	Mixed-Finance	<p>Clinton-Peabody Revitalization The Physical Needs Assessment (PNA) finalized in 2022 showed a significant need for redevelopment of the Clinton-Peabody Apartments.</p> <p>SLHA issued a Request for Proposal (RFP) in February 2022. Through a selection committee of public housing residents, community stakeholders and SLHA board members and staff, Preservation of Affordable Housing (POAH) was selected as the master developer.</p> <p>Community Engagement A key piece of the RFP was to include a significant amount of community engagement. As part of the process, POAH was required to produce a Community Engagement Plan (CEP) to outline their community outreach efforts.</p>	MO001000002	358 units Public Housing	Timeline for activity: Projected start date of activity: 01/2022. Projected end date of activity: 12/2027
B.2 (a)	Mixed-Finance	<p>Family Replacement VI Replacement Housing Factor FY 2015-2020</p> <p>SLHA will use RHF funds to acquire or create new public housing units, or support conversion of public housing units to Rental Assistance Demonstration (RAD).</p>	TO BE DETERMINED	TO BE DETERMINED	Timeline for activity: Start date of activity: 02/2022. Projected end date of activity: 10/2025

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Mixed-Finance Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing, Homeownership programs and Project-Based Vouchers

Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
B.2 (b)	Disposition	Vaughn Family - Warehouse Facility SLHA will submit a Section 18 application to HUD requesting disposition of the property to help realign the SLHA portfolio to support/or create housing opportunities.	MO001000006	0	Timeline for activity: Projected start date of activity: 10/2022. Projected end date of activity 09/2024.
B.2 (b)	Disposition	Euclid Plaza Vacant Land SLHA will consider submitting a Section 18 application to HUD requesting disposition of the property to help realign the SLHA portfolio to create additional housing opportunities.	MO001000013	0	Timeline for activity: Projected start date of activity: 10/2022 Projected end date of activity 09/2024.
B.2 (b)	Demolition/Disposition	Clinton-Peabody Revitalization The Physical Needs Assessment (PNA) finalized in 2022 shows a significant need for revitalization of the Clinton-Peabody Apartments development. The property will be revitalized through the use of a master developer, which may utilize demolition/disposition tools available through HUD.	MO001000002	358 units Public Housing	Timeline for activity: Projected start date of activity: 04/2022 Projected end date of activity 12/2027

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Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
B.2 (b)	Demolition/Disposition	<p>Hodiamont Disposition The PNA finalized in 2022 shows that the property would need \$4.6 million in renovation over 10 years to bring it up to standard. SLHA began the process of collecting the information necessary to submit a Section 18 application in February 2022. This included seeking a capital needs assessment and performing a site specific HUD environmental review. The process will continue in 2023. The property will be demolished and/or sold to a responsible owner committed to furthering SLHAs mission.</p>	MO001000041	22 units Public Housing	<p>Timeline for activity: Technical assistance start date: 02/2022. Projected end date of activity 09/2024.</p>
B.2 (b)	Disposition/Partial Disposition	<p>Cambridge Heights Vacant Land SLHA will submit a Section 18 demo/dispo application to HUD for the property to request disposition from the ACC contract. SLHA may choose to lease the property for a use other than housing.</p>	MO001000058/ MO001000060	0	<p>Timeline for activity: Projected start date of activity: 10/2022 Projected end date of activity 09/2024</p>
B.2 (b)	Partial Disposition	<p>Lookaway Disposition The PNA finalized in 2022 show that these properties would need \$3.1 million in capital improvements over 10 years. SLHA will consider submitting to HUD an application requesting the conversion of single-family PH units to affordable home ownership opportunities.</p>	MO001000041	17	<p>Timeline for activity: Projected start date of activity: 10/2023 Projected end date of activity 09/2024</p>

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Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission	
B.2 (c)	Designated Housing for Elderly and/or Disabled Families	Parkview Apartments - Convert from family to designated elderly housing. SLHA submitted a draft designated housing plan in March and plans to submit a final plan in April 2023. Upon approval, SLHA will begin the conversion process.	MO001000019	295	Timeline for activity: Start date of activity: 10/2022 Projected end date of activity 09/2024.	
B.2 (d)	Conversion of Public Housing to tenant-based or to project-based under RAD conversion.	In 2022, HUD provided technical assistance through a firm with expertise on its asset repositioning plans. A draft report was presented to the SLHA Board of Commissioners at the January 2023 board meeting. Upon final review an acceptance, the Asset Repositioning Strategy will be used to guide future decisions on submitting RAD applications.	TO BE DETERMINED	TO BE DETERMINED	Timeline for activity: Projected start date of activity: 01/2022. Projected end date of activity TBD.	
B.2 (e)	Homeownership	Near South Side LA Saison Construction of 10 single-family homes in two Phases. Conversion of 10 lots to homeownership opportunities.		10	Vacant Lots: Actual start date of activity: 5/31/2016. Phase I - 5 homes constructed. Four of the 5 homes sold in 2022, the final home to be sold in 2023. Phase II - Expected to begin in 2023. The projected end date for activity: 12/31/2025.	
B.2 (e)	Homeownership	Section 8 - Bridge to Homeownership Program		30		
B.2 (f)	Mainstream Voucher program	SLHA receives vouchers from HUD to assist near elderly and/or disabled families.			Allocated 87	Leased 31
B.2 (f)	Special Purpose: Housing Choice Voucher	SLHA continues to receive referrals from the Veteran's Administration for a Special-			Allocated 253	Leased 217

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Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
	Program (VASH) voucher	purpose voucher program under the Veterans Affairs Supportive Housing (VASH) program.			
B.2 (f)	Special Purpose: Emergency Housing Voucher	SLHA receives vouchers from HUD in order to assist individuals and families that are homeless or at risk of being homeless, fleeing, or attempting to flee, domestic violence.			Allocated 161
B.2 (f)	Project-based Vouchers	SLHA has 615 Project-based units. SLHA will be issuing an RFP to increase the number of project-based vouchers in SLHAs Housing Choice Voucher program.	Approved:	23rd Street Elderly, L.P. 25th Street Elderly, L.P. Blumeyer Elderly, L.P. Blumeyer II Associates Cambridge Seniors, L.P. Carr Square Tenant Corp. FP-San Remo Develop., L.P. Grand South Senior, L.P. Hammond Apartments, L.P. Homer G. Phillips, Hist JVL Renaissance I, L.P. JVL Renaissance II, L.P. K-M Housing, LLC Railton Residence, L.P. Salvation Army STL Garrison Residence, L.P. (VAS Salvation Army STL Garrison Residence, L.P. Vaughn Elderly, L.P. Water Tower Place, L.P.	74 70 30 8 36 76 18 80 28 48 6 7 4 50 18 6 26 30 <hr/> Total: <hr/> 615
B.2 (f)	Special Purpose: Tenant Protection Voucher (TPV) program	SLHA receives Tenant Protection Vouchers (TPV) from HUD for special purposes			Leased 138

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Item Number	Program Description	Project Description	Development Number	Unit Count /Affected Units	Time Table for Submission
B.2 (g)	Emergency Safety and Security Application	SLHA continues to apply for funds to address crime and drug-related activities that pose an increased threat to health and safety of residents. SLHA will continue submit a health and safety grant for safety improvements at developments throughout the SLHA portfolio.	MO001000099	PHA Wide	Emergency safety and security application submission anticipated 06/15/23. Timeline for activity: Projected start date of activity: 10/01/2023. Projected end date of activity: 09/30/2024.
B.2 (g)	Housing Related Hazzards Capital Fund and Lead-Based Paint Capital Fund Grant	SLHA continues to apply for funds to address hazzards that may linger in its housing developments including reducing potentials for carbon monoxide poisoning through the application of electric appliances and ventilation fans. SLHA will submit a Housing Related Hazzards Capital Fund grant for PHA Wide units.	MO001000099	PHA Wide	Housing Related Hazzards Capital Fund and Lead-Based Paint Capital Fund Grant application anticipated to be submitted in April 2024. Timeline for activity: Actual start date of activity: 10/01/2023. Projected end date of activity: 09/30/2024.

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ATTACHMENT # 12

Section B.2 (b) – New Activities

Item 11 – Units with Approved Vacancies for Modernization

Cambridge Phase I, AMP MO001000058, will undergo comprehensive modernization of 14 units for age and major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 14 units to be placed into modernization status in IMS/PIC system.

Cambridge Phase II, AMP MO001000060, will undergo comprehensive modernization of 11 units for age and major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 11 units to be placed into modernization status in IMS/PIC system.

Clinton-Peabody, AMP MO001000002, will undergo comprehensive modernization of 28 units for water / mold damage repairs (21 units) and the fire damage repairs (7 units) and rehabilitation of 96 units through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 124 units to be placed into modernization status in IMS/PIC system.

Cochran Plaza, AMP MO001000037, will undergo rehabilitation of 7 units through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 7 units to be placed into modernization status in IMS/PIC system.

King Louis III, AMP MO001000052, will undergo comprehensive modernization of 2 units for water damage repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

LaSalle Park, AMP MO001000034, will undergo comprehensive modernization of 2 units for repairs related to fire damage (1) and sewer (1). The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

Les Chateaux, AMP MO001000048, will undergo rehabilitation of 1 unit through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

NSSS - Cupples, AMP MO001000041, will undergo comprehensive modernization of 3 units through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 3 units to be placed into modernization status in IMS/PIC system.

NSSS - Hodiament, AMP MO001000041, will undergo an asset repositioning strategy for the property. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 22 units to be placed into modernization status in IMS/PIC system.

NSSS – Lookaway, AMP MO001000041, will undergo rehabilitation of 4 units through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 unit to be placed into modernization status in IMS/PIC system.

NSSS - McMillan Manor 1 & II, AMP MO001000041, will undergo comprehensive modernization of 4 units for necessary age-related major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 units to be placed into modernization status in IMS/PIC system.

NSSS – Page Manor, AMP MO001000041, will undergo comprehensive modernization of 5 units for mold remediation through property management or third-party vendors to return the units to occupancy. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 5 units to be placed into modernization status in IMS/PIC system.

NSSS - Samuel Shepard, AMP MO001000041, will undergo comprehensive modernization of 5 units for fire damage (1) and water / mold damage (2) repairs and two (2) through property management or third-party vendors to return the units to occupancy. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 5 units to be placed into modernization status in IMS/PIC system.

NSSS – Towne XV, AMP MO001000041, will undergo rehabilitation of 5 units through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 5 units to be placed into modernization status in IMS/PIC system.

Parkview Apartments, AMP MO001000019, will undergo modernization of 12 units for water infiltration damage repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 12 units to be placed into modernization status in IMS/PIC system.

SSSS – California Gardens, AMP MO001000038, will undergo rehabilitation of 9 units through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 9 units to be placed into modernization status in IMS/PIC system.

SSSS – Folsom, AMP MO001000038, will undergo rehabilitation of 1 unit through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

SSSS – Lafayette Townhomes (2900 Park), AMP MO001000038, will undergo comprehensive modernization of 4 units for structural repairs and associated unit interior repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 units to be placed into modernization status in IMS/PIC system.

SSSS – Marie Fanger, AMP MO001000038, will undergo comprehensive modernization of 1 unit for repairs related to mold and water damage through property management or third-party vendors. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

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ATTACHMENT #13

Section B.5 – Progress Report

Status of Goals and Objectives

The St. Louis Housing Authority (SLHA) revised its Five-Year Strategic Plan in 2020. In 2018, the leadership of the SLHA determined that the strategic plan developed in 2013 was out of date and needed to be revised. To accomplish the task, in 2019, SLHA retained the Bronner Group to facilitate the creation of the Strategic Plan (Plan). Development of the Plan included two public meetings, two staff/board retreats, interviews with staff and stakeholders and over 700 survey responses. The new Plan was approved by the Board of Commissioners by resolution #2903 at its February 2020 meeting.

The Plan establishes the strategic focus that will drive the SLHA to deliver quality housing and services to our community. SLHA designed the Five-Year Strategic Plan to coincide with the City of St. Louis' 2020-2025 Consolidated Plan. This will allow for greater collaboration, communication and streamlining of housing strategies for the St. Louis region.

Thereafter, SLHA implemented a tracking system (Goal Tracker) to establish the milestones for the goals and objectives of the Plan. By this time, SLHA's focus on priorities drastically changed due to the Covid-19 Pandemic. SLHA engaged in activities to respond to the pandemic by implementing measures to protect residents, clients and staff. SLHA staff has been engaged in numerous activities to change policies, increase awareness, purchase personal protective equipment, supplies and services for all developments and offices. In addition, SLHA has hired contractors to install new safety measures for adopting social distancing and protection against infection or transmission.

Due to the pandemic, SLHA had delayed the implementation of its Strategic Plan goals and objectives until operations start to stabilize. The Plan has been revised with new milestones and progress of activities.

ID	Level	Goal/Objective/Action	Responsible Unit/ Person	Target Start Date	Target End Date	Percent Complete	Status
1	Goal	Support safe and secure environments for SLHA's residents and staff				27%	
1.1	STR	Develop Standardized Safety Plan for all properties and sites	Asset Management	October 1, 2021	December 31, 2024	0%	
1.1.1	ACT	Assess current safety practices and informal safety plans at developments	Asset Management	October 1, 2021	June 30, 2023	0%	Not Started
1.1.2	ACT	Review existing policies regarding access to SLHA properties and update as needed; develop a formal plan if unavailable	Asset Management	October 1, 2021	June 30, 2023	0%	Not Started
1.1.3	ACT	With assistance of the property management companies, draft and implement a standardized safety plan using a Trauma Informed lens	Asset Management	October 1, 2021	June 30, 2023	0%	Not Started
1.1.4	1.1.5	Create and utilize a checklist to use to monitor property management companies to ensure adherence to safety plans and the maintenance of a safe and secure property	Asset Management	October 1, 2021	June 30, 2023	0%	Not Started
1.1.5	ACT	With assistance of property management companies, create emergency management plans for each development, creating signage of evacuation plans if unavailable	Asset Management	October 1, 2021	June 30, 2023	0%	Not Started
1.1.6	ACT	Conduct preparedness exercises at all public housing developments (Active shooter, fire, earthquake, tornado, etc)	Asset Management	October 1, 2021	June 30, 2023	0%	Not started
1.2	STR	Work collaboratively with residents, neighbors and the Police Department to foster safe and secure environments	Asset Management	May 1, 2021	December 31, 2024	15%	
1.2.1	ACT	On a quarterly basis, request police department to attend resident meetings	Asset Management	July 1, 2021	December 31, 2024	20%	On-going
1.2.2	ACT	Annually, request that the Fire Department attend resident meetings to address fire safety	Asset Management	July 1, 2021	December 31, 2024	0%	Not started
1.2.3	ACT	With the assistance of the SLMPD, implement a strategy for community policing in public housing	Executive	May 1, 2021	December 31, 2024	30%	On-going
1.2.4	ACT	Annually, attend neighborhood meetings in neighborhoods with 50+ public housing units to foster relationships	Asset Management	July 1, 2021	December 31, 2024	10%	Underway
1.3	STR	Identify and address environmental hazards to promote healthy homes	Asset Management, HCV	January 1, 2020	December 31, 2024	58%	
1.3.1	ACT	Monitor property management companies to ensure that annual inspections occur in a timely manner and that issues identified are addressed	Asset Management	January 1, 2021	December 31, 2024	70%	On-going
1.3.2	ACT	Request copies of Pre-REAC inspections completed by property management companies and monitor for health and safety deficiencies; follow up as needed	Asset Management	January 1, 2021	December 31, 2024	80%	On-going
1.3.3	ACT	Create checklist to use and spot check public housing inspections to ensure timely and proper completion	Asset Management	January 1, 2021	December 31, 2024	30%	Underway
1.3.4	ACT	Complete HCV Inspections, including quality control inspections, in a timely manner; require landlords to complete necessary repairs in a timely manner.	HCV	January 1, 2020	December 31, 2024	50%	Underway
1.4	STR	Create a safety plan for SLHA central office	Executive	April 1, 2021	December 31, 2024	35%	
1.4.1	ACT	Assess current safety practices and informal safety plans	Executive	April 1, 2021	December 31, 2023	30%	Underway
1.4.2	ACT	Review existing policies regarding access to SLHA central office and update as needed;	Executive	April 1, 2021	December 31, 2023	30%	Underway
1.4.3	ACT	Create emergency management plan, creating signage of evacuation plans if unavailable	Development & Modernization	August 30, 2021	December 30, 2022	80%	Underway
1.4.4	ACT	Conduct preparedness exercises (active shooter, fire, earthquake, tornado, etc)	Development & Modernization	June 30, 2022	December 31, 2024	0%	Not started
2	Goal	Support safe and secure environments for SLHA's residents and staff				20%	
2.1	STR	Update Capital and Property Portfolio Plans	Executive, Development &	September 20, 2020	February 22, 2022	48%	
2.1.1	ACT	Perform Physical Needs Assessment of properties	Development & Modernization	April 1, 2021	March 31, 2022	100%	Complete
2.1.2	ACT	Perform Asset repositioning exercise to create portfolio plan; considering	Executive, Development &	October 1, 2021	December 31, 2023	40%	Underway
2.1.3	ACT	Perform Environmental Review	Development & Modernization	September 1, 2020	June 30, 2023	90%	Underway
2.1.4	ACT	Explore non-traditional financing tools (bonds, tax credits, opportunity zones, refinancing,	Development & Modernization	November 1, 2021	December 31, 2024	0%	Not started
2.1.5	ACT	Identify and leverage underutilized assets to generate revenue	Executive, Development &	December 1, 2021	October 31, 2023	10%	Underway
2.2	STR	Communicate benefits and program changes of new housing programs (i.e. RAD) to	Development & Modernization	January 13, 2022	April 11, 2023	0%	
2.2.1	ACT	Develop talking points, PR/campaign materials for the new programs being adopted	Development & Modernization	January 13, 2022	April 30, 2023	0%	Not started
2.2.2	ACT	Schedule meetings with different stakeholder groups (staff, TAB, general public mtgs,	Development & Modernization	March 25, 2022	April 30, 2023	0%	Not started
2.2.3	ACT	Develop online content (website, social media) to communicate new program info, FAQs,	Development & Modernization	January 13, 2022	April 30, 2023	0%	Not started
2.3	STR	Implement Portfolio Plan	Executive, Development &	April 5, 2022	July 22, 2023	20%	
2.3.1	ACT	Identify and secure financing to complete redevelopment of Clinton-Peabody (see Goal 4)	Executive, Development &	April 5, 2022	December 31, 2023	30%	Underway
2.3.2	ACT	Develop procurement solicitation (RFP/RFQ) for development assistance	Development & Modernization	May 5, 2022	July 5, 2024	30%	Underway
2.3.3	ACT	Implement development plan in accordance with scope of work outlined in the	Development & Modernization	July 5, 2022	July 22, 2024	0%	Not started
2.4	STR	Pursue development opportunities (new)	Executive, Development &	April 1, 2021	July 29, 2022	13%	
2.4.1	ACT	Ensure spending of replacement housing funds by regulatory deadline. (some funds may	Development & Modernization	April 1, 2021	May 31, 2023	20%	Underway
2.4.2	ACT	Identify sites for potential new development	Executive, Development &	May 1, 2021	December 31, 2024	10%	Underway
2.4.3	ACT	Develop procurement solicitation (RFP/RFQ) for development assistance	Development & Modernization	June 1, 2021	December 31, 2024	10%	Underway
2.4.4	ACT	Implement development plan in accordance with scope of work outlined in the	Development & Modernization	July 12, 2021	December 31, 2024	10%	Underway
3	Goal	Strengthen monitoring and oversight of Property Management companies					
3.1	STR	Strengthen contract compliance monitoring and enforcement and revise contract language	Asset Management	January 1, 2021	December 31, 2024	93%	
3.1.1	ACT	Strengthen contract compliance monitoring and enforcement and revise contract	Asset Management	January 1, 2021	December 1, 2021	100%	On-going
3.1.2	ACT	Monitor the performance metrics and baseline measures by inspecting the properties at	Asset Management	February 1, 2021	December 31, 2024	80%	On-going
3.1.3	3.1.4	Enforce compliance with contract requirements, requiring corrective action plans as	Asset Management	January 1, 2021	December 31, 2024	100%	On-going
3.2	STR	Create and enforce standards of professionalism and customer service across all properties	Asset Management	October 1, 2021	December 31, 2024	5%	

3.2.1	ACT	Convene two meetings with property management companies to mutually agree on a	Asset Management	October 1, 2021	June 30, 2023	10%	Underway
3.2.2	ACT	Utilizing information from meetings, develop standard code of conduct and dress code	Asset Management	October 1, 2021	June 30, 2023	0%	Not started
3.2.3	ACT	Annually, conduct customer service/professionalism training for property management	Asset Management	October 1, 2021	December 31, 2024	10%	Underway
3.2.4	ACT	Monitor property management companies for adherence to the code of conduct and	Asset Management	October 21, 2021	December 31, 2024	0%	Not started
4	Goal	Plan and implement redevelopment of Clinton-Peabody				39%	
4.1	STR	Continue to implement actions agreed upon in Consent Agreement	Legal	January 1, 2020	December 31, 2022	100%	Complete
4.1.1	ACT	Refer to consent agreement and implement	Legal	January 1, 2020	December 31, 2022	100%	Complete
4.2	STR	Identify Master Developer to identify financing to complete redevelopment of Clinton-	Executive, Development &	April 5, 2022	December 31, 2023	55%	
4.2.1	ACT	Solicit for Master Developer to determine type of project and financing	Development & Modernization	April 5, 2022	December 31, 2022	100%	Complete
4.2.2	ACT	Analysis and determination of viable project and financing	Development & Modernization	June 5, 2022	September 30, 2023	10%	Underway
4.3	STR	Provide clear communication in transparent manner to residents and the community	Development & Modernization	June 5, 2022	February 11, 2023	0%	
4.3.1	ACT	Support existing residents during redevelopment and construction activities	Development & Modernization	June 5, 2022	December 31, 2025	0%	Not started
4.4	STR	Develop and implement plan to redevelop Clinton-Peabody	Development & Modernization	February 23, 2022	December 31, 2026	11%	
4.4.1	4.4.2	See 4.3.1	Development & Modernization	February 23, 2022	December 31, 2025	0%	Not started
4.4.2	ACT	Hire 3rd party developer to implement development plan	Executive, Development &	February 28, 2022	April 30, 2023	80%	Underway
4.4.3	ACT	Analysis of viable development and funding options from 4.2.1	Development & Modernization	July 31, 2022	April 1, 2023	0%	Not started
4.4.4	ACT	Create development plan and schedule	Development & Modernization	July 31, 2022	April 1, 2023	0%	Not started
4.4.5	ACT	Implement development plan and schedule	Development & Modernization	January 23, 2023	April 1, 2023	0%	Not started
4.4.6	ACT	Concept, Pre-Development	Development & Modernization	July 1, 2022	June 30, 2023	0%	Not started
4.4.7	ACT	Environmental Assessment, Review	Development & Modernization	July 31, 2022	June 30, 2023	50%	On-going
4.4.8	ACT	Initiate Public Engagement	Development & Modernization	July 31, 2022	December 31, 2024	10%	Underway
4.4.9	ACT	Tax Credit Applications, Abatement, Zoning, Utility	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.10	ACT	HUD Development Proposal, Evidentiaries, Closing	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.11	ACT	Construction-Site Prep, Housing & Public Improvements	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.12	ACT	Construction	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.13	ACT	Lease-Up and Development Close-Out	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.5	STR	Ensure safe and secure environments for Clinton-Peabody residents and staff (see Goal 1)	Asset Management			27%	0
5	Goal	Expand housing opportunities within the Housing Choice Voucher program					
5.1	STR	Improve relations with HCV participants and property owners	HCV	June 1, 2022	December 31, 2024	0%	
5.1.1	ACT	Create and implement Customer Service Plan for HCV participants	HCV	June 1, 2022	June 1, 2023	0%	Not Started
5.1.2	ACT	Update the resident and landlord information packets	HCV	June 1, 2022	June 1, 2023	0%	Not Started
5.1.3	ACT	Annually, issue landlord satisfaction survey to identify program strengths and	HCV	June 1, 2022	December 31, 2024	0%	Not Started
5.1.4	ACT	Annually, issue resident satisfaction survey to identify program strengths and	HCV	June 1, 2022	December 31, 2024	0%	Not Started
5.2	STR	Increase number of vouchers	HCV	January 1, 2020	December 31, 2024	60%	
5.2.1	ACT	Monitor NOFAs for vouchers	HCV	January 1, 2020	December 31, 2024	60%	Underway
5.2.2	ACT	Apply for grants	HCV	January 1, 2020	December 31, 2024	60%	Underway
5.2.3	ACT	Implement if awarded	HCV	January 1, 2020	December 31, 2024	60%	Underway
5.3	STR	Provide mobility support to households that seek to live in areas of opportunity	HCV	October 1, 2019	September 30, 2024	60%	
5.3.1	ACT	Introduce HCV participants to Mobility Counseling program at recertification; enroll	HCV	January 1, 2020	January 1, 2024	60%	On-going
5.3.2	ACT	Provide pre/post move counseling	HCV	October 1, 2019	September 30, 2024	60%	Underway
5.3.3	ACT	Property owner outreach	HCV	October 1, 2019	September 30, 2024	60%	Underway
5.3.4	ACT	Continue to have competitive payment standards	HCV	January 1, 2020	January 1, 2024	60%	Complete
5.4	STR	Increase number of participating landlords with emphasis in areas of opportunity	HCV	October 1, 2022	September 30, 2023	0%	
5.4.1	ACT	Develop a marketing plan	HCV & Marketing	October 1, 2022	January 31, 2024	0%	Not Started
5.4.2	ACT	Approve marketing plan	HCV & Marketing	January 1, 2023	June 30, 2024	0%	Not Started
5.4.3	ACT	Implement marketing plan	HCV & Marketing	February 1, 2023	September 30, 2024	0%	Not Started
6	Goal	Expand and diversify funding and partnerships				31%	
6.1	STR	Expand resources for resident services	Resident Initiatives	October 1, 2019	December 31, 2024	63%	
6.1.1	ACT	Consider submitting application for Al Chapelle Center to achieve designation as Envision Center from HUD	Executive	September 1, 2022	December 31, 2024	0%	Not Started
6.1.2	ACT	Apply for volunteer resource from AmeriCorps and other Federal programs including	Resident Initiatives	Summer 2021	Summer 2024	60%	Underway
6.1.3	ACT	Submit application for NOFA Mobility Program	Ascend	Spring/Summer 2020	Fall 2020	100%	Complete
6.1.4	ACT	Leverage ConnectHome USA program to expand internet access to residents through	IT	October 1, 2019	September 30, 2023	90%	Underway
6.2	STR	Explore creating "grant writing" position	Executive	October 1, 2021	September 1, 2022	10%	
6.2.1	ACT	Identify funding options for this position	Executive	March 1, 2022	December 31, 2023	10%	Underway
6.2.2	ACT	Conduct benchmarking on how other PHAs seek grant funding	Executive	October 1, 2021	December 31, 2023	20%	Underway
6.2.3	ACT	Develop grant writing job description	HR	April 1, 2022	June 30, 2023	0%	Not Started
6.3	STR	Expand resources for housing opportunities	Executive	September 1, 2021	October 1, 2023	25%	
6.3.1	ACT	Explore non-traditional financing tools (bonds, tax credits, opportunity zones, etc.) - see Goal 2	Executive	September 1, 2021	December 31, 2023	50%	Underway
6.3.2	ACT	Apply for non-traditional financing tools	Executive	October 1, 2022	October 1, 2023	0%	Not Started
6.4	STR	Attract resources from the philanthropic, local, civic and business community with	Executive	October 1, 2020	September 1, 2024	48%	
6.4.1	ACT	Direct funding raised via 80th Anniversary event to resident related activities	Executive	January 1, 2021	December 31, 2023	60%	Underway
6.4.2	ACT	Create ConnectHome partnerships with partner organizations	Executive, IT	January 9, 2020	September 30, 2023	90%	Underway
6.4.3	ACT	Leverage resources from Program Coordinating Committee within Resident Initiatives	Resident Initiatives	October 1, 2020	December 31, 2024	40%	Underway
6.4.4	ACT	Develop MOUs with partner agencies	Resident Initiatives	December 1, 2020	December 31, 2024	30%	Underway
6.4.5	ACT	Use calendar, key milestones, and funding requirements for the priority foundations in region	Executive	October 1, 2021	September 30, 2024	50%	Not Started

6.4.6	ACT	Identify grant/funding opportunities for youth services	Resident Initiatives	October 1, 2021	September 30, 2024	20%	Not Started
6.5	STR	Leverage instrumentalities to generate additional resources to support the authority's mission	Executive	January 1, 2020	September 30, 2024	10%	
6.5.1	ACT	Create earned income/non-federal income through repurposing existing assets	Executive	September 1, 2021	September 30, 2024	10%	Underway
6.5.2	6.5.3	Analyze existing instrumentality/affiliate structure and determine optimal structure	Executive	January 1, 2020	December 31, 2024	10%	Underway
7	Goal	Optimize internal operations				40%	
7.1	STR	Leverage technology for efficiencies and improved performance	IT	January 1, 2020	December 31, 2024	50%	
7.1.1	ACT	Complete implementation of Yardi Phase 1 (internal)	IT	January 1, 2020	April 30, 2023	90%	Underway
7.1.2	ACT	Launch RentCafe module and marketing programs for Owners, Participants and Residents	IT, HCV & PHA	January 1, 2020	April 30, 2023	50%	On-going
7.1.3	ACT	Explore purchase order workflows and implement if feasible	IT	April 1, 2021	December 31, 2023	10%	Underway
7.1.4	ACT	Plan for implementation of additional Yardi modules that were purchased (e.g. Budget, Provide training to staff to better protect sensitive and confidential information from	IT	July 1, 2021	June 30, 2023	0%	Not Started
7.1.5	ACT	Further virtualize the IT server environment to eliminate the need for physical hardware.	IT	January 1, 2020	December 31, 2024	60%	Underway
7.1.6	ACT	Update and better utilize Microsoft 365 tools, such as SharePoint and Teams	Everyone	March 15, 2020	December 31, 2024	80%	On-going
7.2	STR	Optimize processes, procedures and controls	Executive	January 1, 2020	December 31, 2022	40%	
7.2.1	ACT	Review existing procedures, manuals, policies, etc. to identify areas where updates are	Executive	January 1, 2020	December 31, 2022	100%	Complete
7.2.2	ACT	Update and create policies/procedures/etc. within team/department with agency-wide	Executive	January 1, 2021	December 31, 2023	10%	Underway
7.2.3	ACT	Create Business Continuity Plan to ensure critical processes continue in the event of a	Executive	March 15, 2020	September 30, 2023	90%	Underway
7.2.4	ACT	Update Personnel policy	HR	May 21, 2021	June 30, 2023	40%	Underway
7.2.5	ACT	Compile key procedures into an SLHA Standard Operating Procedure	Executive	December 31, 2021	June 30, 2024	0%	Not Started
7.2.6	ACT	Create a maintenance framework to ensure that all SLHA plans remain current and applicable	Executive	December 31, 2021	December 31, 2024	0%	Not Started
7.3	STR	Retain and attract talent	HR	March 1, 2022	December 31, 2022	15%	
7.3.1	ACT	Perform compensation and benefits study; request recommendations	HR	March 1, 2022	June 30, 2023	30%	Not Started
7.3.2	ACT	Update Succession Plan to identify next generation of SLHA leaders	HR	March 1, 2022	September 30, 2023	0%	Not Started
7.4	STR	Provide training and professional development opportunities to staff	HR	April 1, 2021	December 31, 2024	60%	
7.4.1	ACT	Identify agency-wide training needs - required training AND "soft skills" (including training	HR	June 1, 2021	December 31, 2024	70%	Underway
7.4.2	ACT	Create and implement framework for Personalized Development/Growth Plans for all	HR	April 1, 2021	June 30, 2023	50%	Underway
7.4.3	ACT	Conduct annual staff retreat or "in-service".	HR	April 1, 2021	December 31, 2024	60%	On-going
7.5	STR	Maintain HCV High Performer status	HCV	February 24, 2020	December 31, 2024	33%	
7.5.1	ACT	Hold monthly SEMAP meetings to identify status and deficiencies	Internal Auditor, HCV	June 1, 2021	December 31, 2024	40%	Not Started
7.5.2	ACT	Conduct bi-annual compliance/file reviews of HCV files; report findings to Executive Director	Operations	June 1, 2021	December 31, 2024	20%	Not Started
7.5.3	ACT	Hold annual debriefing after SEMAP submission, identifying areas of improvement	Operations	October 15, 2020	December 31, 2024	20%	Underway
7.5.4	ACT	Streamline and simplify forms and documents used by HCV participants and owners	Operations	February 24, 2020	April 30, 2023	50%	Not Started
7.6	STR	Recapture PH High Performer status	Asset Management	January 1, 2020	December 31, 2024	43%	
7.6.1	ACT	Hold monthly PHAS indicators meetings to identify status and deficiencies	Asset Management	January 1, 2020	December 31, 2024	100%	On-going
7.6.2	ACT	Conduct bi-annual Public Housing files; report findings to Executive Director	Operations	June 1, 2020	December 31, 2024	20%	On-going
7.6.3	ACT	Hold annual debriefing after PHAS submission, identifying areas of improvement	Operations	October 15, 2020	December 31, 2024	20%	On-going
7.6.4	ACT	Streamline and simplify forms and documents used by public housing residents and	Asset Management	December 1, 2021	December 31, 2024	30%	Underway
8	Goal	Promote and maintain positive community identity and relationships				41%	
8.1	STR	Create PH Resident Engagement Plan	Resident Initiatives	August 1, 2020	December 31, 2024	28%	
8.1.1	ACT	Research and identify best practices for resident engagement	Resident Initiatives	July 1, 2021	December 31, 2024	50%	Underway
8.1.2	8.1.3	Convene meeting of residents to obtain feedback (e.g. TAB, resident commissioners)	Resident Initiatives	December 1, 2021	December 31, 2023	60%	Underway
8.1.3	ACT	Create draft Engagement Plan	Marketing	August 31, 2022	December 31, 2023	0%	Not Started
8.1.4	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	November 1, 2022	June 30, 2024	0%	Not Started
8.2	STR	Create HCV Participant/Landlord Engagement Plan	Marketing & HCV	August 1, 2021	December 31, 2022	22%	
8.2.1	ACT	Research and identify best practices for HCV participant and Landlord engagement	Marketing & HCV	August 1, 2021	December 31, 2023	60%	Not Started
8.2.2	ACT	Convene meeting of HCV participants to obtain feedback	HCV	August 1, 2022	December 31, 2023	0%	Not Started
8.2.3	ACT	Convene meeting of Landlord to obtain feedback	HCV	August 1, 2022	December 31, 2023	50%	On-going
8.2.4	ACT	Create draft Engagement Plan	Marketing	August 1, 2021	June 30, 2024	0%	Not Started
8.2.5	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	November 1, 2022	June 30, 2024	0%	Not Started
8.3	STR	Strengthen relationships with the community and civic organizations	Executive	March 1, 2020	December 31, 2024	60%	
8.3.1	ACT	Identify civic/community groups with shared interest	Executive	March 1, 2020	December 31, 2024	60%	On-going
8.3.2	ACT	Prioritize and determine appropriate SLHA person(s) to engage the civic/community	Executive	March 1, 2020	December 31, 2024	60%	On-going
8.3.3	ACT	Develop one-pager or other PR materials that highlights SLHA's role in community and	Marketing	September 1, 2021	December 31, 2023	60%	On-going
8.3.4	ACT	Seek to formalize partnership through standardized MOU process or other arrangements	Resident Initiatives	August 15, 2020	December 31, 2024	60%	On-going
8.4	ACT	Develop internal standards and protocols for managing relationships with partners (e.g.	Resident Initiatives	July 1, 2020	December 31, 2024	60%	On-going
8.4	STR	Utilize website and social media more effectively to communicate with stakeholders	Marketing	January 1, 2020	December 31, 2024	63%	
8.4.1	ACT	Post to social media updates on SLHA programs, events, success stories, etc.	Marketing	January 1, 2020	December 31, 2024	80%	On-going
8.4.2	ACT	Continue development of relevant website content to increase awareness of SLHA	Marketing	January 1, 2020	December 31, 2024	80%	On-going
8.4.3	ACT	Develop internal guidelines for sharing content across digital platforms	Marketing	June 1, 2021	December 31, 2023	0%	Not Started
8.4.4	8.4.5	Connect social media feeds to SLHA website (you can see social media posts on site)	Marketing	June 1, 2021	September 30, 2023	90%	Underway
8.5	STR	Create transparency Plan that provides guidance to public on SLHA communication practices	Executive	July 1, 2021	June 1, 2022	5%	
8.5.1	ACT	Research and identify best practices on communication transparency between agencies	Executive	July 1, 2021	December 31, 2023	20%	On-going
8.5.2	8.5.3	Convene meeting of residents to obtain feedback (e.g. TAB, resident commissioners)	Executive	January 30, 2022	March 31, 2024	0%	Not Started
8.5.3	ACT	Create draft communication transparency plan	Executive	March 1, 2022	June 30, 2024	0%	Not Started
8.5.4	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	June 1, 2022	December 31, 2024	0%	Not Started
8.6	STR	Update communications plan to include crisis communication	Marketing	July 1, 2020	September 30, 2023	67%	Complete
8.6.1	ACT	Research and identify best practices for crisis communications	Marketing	July 1, 2020	August 15, 2020	100%	Complete
8.6.2	ACT	Create draft communications plan with crisis communication component	Marketing	December 31, 2021	March 1, 2022	100%	Complete
8.6.3	ACT	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	March 1, 2022	April 1, 2022	0%	Not Started
8.7	STR	Streamline and simplify forms and documents used by residents, HCV participants and	Asset Management, HCV	July 1, 2021	December 31, 2022	23%	
8.7.1	ACT	Edit and submit digital files for current forms in use to Marketing for updating	Asset Management, HCV	July 1, 2021	December 31, 2023	60%	Underway
8.7.2	ACT	Forms to be re-designed and reviewed for approval	Marketing, Legal, Executive	July 1, 2021	March 31, 2024	10%	Not Started

8.7.3	ACT	Approved forms distributed and linked to website	Marketing	July 1, 2021	March 10, 2024	0%	Not Started
8.8	STR	Develop relationships within affordable housing industry to share knowledge and best	Everyone	January 1, 2020	December 31, 2024	30%	
8.8.1	ACT	Attend local, regional and national convenings/conferences	Everyone	January 1, 2020	December 31, 2024	60%	Underway
8.8.2	ACT	Serve on national committees and boards related to affordable housing	Executive	January 1, 2022	December 31, 2024	0%	Not Started
8.9	STR	Strengthen internal communication	Everyone	June 1, 2021	December 31, 2024	60%	Underway
8.9.1	ACT	Issue quarterly staff newsletters that highlight status of current activities	Marketing	June 1, 2021	December 31, 2024	60%	On-going
8.10.	STR	Create culture of employee engagement and ownership	HR	December 1, 2021	December 31, 2024	50%	On-going
8.10.1	ACT	Revive event committee as Employee Appreciation Committee	HR	December 1, 2021	December 31, 2024	50%	On-going
9	9	Improve quality of life of PH residents and HCV participants through services and				45%	
9.1	STR	Expand resources for resident services, including funding for additional resident services	Resident Initiatives	December 1, 2019	December 31, 2024	50%	
9.1.1	ACT	Refer to Strategy 6.1	Resident Initiatives	December 1, 2019	December 31, 2024	50%	Underway
9.1.2	STR	Continue implementation of Human Services Plan	Resident Initiatives	October 1, 2019	December 31, 2024	35%	
9.1.3	ACT	Secure MOUs and Partner Agreements for defined services	Resident Initiatives	October 1, 2019	December 31, 2024	30%	Underway
9.1.4	ACT	Expand Program Coordinating Committee	Resident Initiatives	October 1, 2019	December 31, 2024	40%	Underway
9.2	STR	Prepare for transition for completion of Jobs Plus program	Resident Initiatives	April 1, 2020	September 30, 2022	100%	Complete
9.2.1	ACT	Submit close-out documents including SF-425 financials, Demographic Report, JPEID,	Resident Initiatives	April 1, 2020	June 30, 2021	100%	Complete
9.3	STR	Expand residents' access to technology	IT	October 1, 2021	April 30, 2023	50%	
9.3.1	ACT	Implement Rent Café profiles for clients	IT	January 1, 2020	April 30, 2023	50%	Underway
9.4	STR	Complete improvements to Al Chappelle Community Center and increase utilization of	Resident Initiative & Development	October 1, 2020	December 31, 2024	27%	
9.4.1	ACT	Create or improve partnerships with social service agencies (see 6.4.4; 9.2.1)	Resident Initiatives	October 1, 2020	December 31, 2024	30%	On-going
9.4.2	ACT	Utilization of the Resident Initiative Marketing Plan	Resident Initiatives	October 1, 2020	December 31, 2024	50%	On-going
9.4.3	ACT	Physical Improvements to the Al Chappelle Center and Clinton-Peabody Development	Development & Modernization	October 1, 2021	September 30, 2024	0%	Not Started
9.5	STR	Expand access of resident initiatives programs to HCV participants	Resident Initiatives	December 1, 2021	December 31, 2024	7%	
9.5.1	ACT	Create marketing and communications plan specific to HCV	Resident Initiatives	December 1, 2021	June 30, 2024	10%	Underway
9.5.2	ACT	Inform and Educate SLHA staff of plan	Resident Initiatives	July 1, 2022	December 31, 2024	0%	Not Started
9.5.3	ACT	Distribute RI information to all HCV households annually	Resident Initiatives	December 31, 2021	December 31, 2024	10%	Underway

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #14

Section B.6 – Resident Advisory board (RAB)

Comments and Responses

Special Notice:

The Public Hearing is scheduled for June 14, 2023; therefore, the Comments and Responses will be provided to the Board of Commissioners at the meeting on June 24, 2023.

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

U. S Department of Housing and Urban Development

Office of Public and Indian Housing

OMB No. 2577-0226

Expires 3/31/2024

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

I, Justin Jackson, the Director of Housing
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years _____ and/or Annual PHA Plan for fiscal
year 2023 of the The St. Louis Housing Authority
is consistent with the

PHA Name

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

The City of St. Louis Missouri

Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR §§ 903.7(o)(3) and 903.15.

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

The St. Louis Housing Authority's (SLHA's) Fiscal Year 2023 Agency Plan (Annual Plan) is consistent with the City of St. Louis's Consolidated Plan because its business strategies are aligned to provide programs that benefit the very-low and low-to moderate-income households in the City. SLHA and the City strive to accomplish this through the prevention or elimination of neighborhood blight and by providing safe, decent, affordable housing choices throughout the community. The SLHA and City continue to pursue and invest in opportunities for mixed-finance partnerships with private developers, investors, and community residents to develop affordable housing choices to improve the quality and energy efficiency of housing in the jurisdiction.

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

Name of Executive Director:

Name Board Chairperson:

Signature

Date

Signature

Date

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

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

**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 2023, in connection with the submission of the Plan and implementation thereof:

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

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

St. Louis Housing Authority (SLHA)
 PHA Name

MO001
 PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2023

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	Signature	Date
	7/15/2023		7/15/2023

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

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

Civil Rights Certification
(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 2023 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:		Name of Board Chairperson:	
Alana C. Green		Sal Martinez	
Signature	Date <u>7/15/2023</u>	Signature	Date <u>7/15/2023</u>

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.

St. Louis Housing Authority

FY 2023 Annual Plan

Table of Attachments

**Other Documents and /or Certifications not included in the Annual Submission
(Referencing Standard Template Form HUD-50075-ST)**

Attachment #18	Section B.1 (b) – Deconcentration Analysis
Attachment #19	Section B.2 (b) – Designated Housing Narrative
Attachment #20	Affirmatively Furthering Fair Housing Analysis
Attachment #21	SLHA Board Resolution – Agency Plan Submission
Attachment #22	SLHA Board Resolution – Five-year Capital Fund Plan

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #18

Section B.1 (c) – Deconcentration of Poverty and Income Mixing [24 CFR 903.1 and 903.2]

Deconcentration of poverty and income mixing is a policy that allows PHA’s to bring higher income tenants into lower income developments and lower income tenants into higher income developments. In accordance with 24 CFR Part 903, a Deconcentration and Income Mixing Policy is required as a part of SLHA’s Admissions and Continued Occupancy Policy (ACOP). SLHA’s Deconcentration and Income Mixing Policy is included in Chapter 6 of the ACOP – Tenant Selection, Section 6.4.

Developments subject to the deconcentration of poverty and income mixing requirements are referred to as “covered” developments”. Covered developments include general occupancy (or family) public housing developments.

Developments not subject to the requirement include public housing developments:

- with-fewer than 100 public housing units;
- designated specifically for elderly and/or disabled residents;
- approved for demolition or for conversion to tenant-based assistance; and
- approved mixed-finance developments using HOPE VI or public housing funds.

Table 2 - Average Income of Public Housing Developments includes a list of all SLHA developments, their annual income and if they are subject to the Deconcentration and Income Mixing Requirements.

SLHA will determine the average income of families in all covered developments on an annual basis. SLHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85 percent to 115 percent of the average family income. The results of SLHA’s analysis are summarized on **Table 1 - Average Income of Families in All Covered Developments**.

If covered developments have an average income outside the EIR, SLHA will then determine whether or not these developments are consistent with its local goals and annual plan. If the development is not consistent with local goals and annual plan the SLHA may skip a family on the waiting list to reach another family in an effort that would further the goals of deconcentration.

Deconcentration of Poverty and Income Mixing
Table 1: Average Income of Families in Covered Developments

Development Name	Average Income	Average Income ALL Developments	% of Income	Established Income Range (85% - 115%)
Clinton Peabody	\$7,172	\$11,741	61%	Below
James House	\$8,046	\$11,741	69%	Below
Euclid Plaza	\$8,353	\$11,741	71%	Below
Northside Scattered Sites	\$12,286	\$11,741	105%	Within
Parkview	\$8,729	\$11,741	74%	Below
Southside Scattered Sites	\$9,229	\$11,741	79%	Within
Badenhaus/Badenfest	\$8,363	\$11,741	71%	Below
LaSalle Park	\$11,480	\$11,741	98%	Within
Kingsbury Terrace	\$11,274	\$11,741	96%	Within
ALL Covered Developments	\$9,209	\$11,741	78%	-
ALL DEVELOPMENTS	\$11,741	\$11,741	100%	-

*As of February 28, 2023

Deconcentration of Poverty and Income Mixing
Table 2: Average Income of Public Housing Developments*

Dev. Number	Development Name		Count of Families	Average Income
020	Clinton-Peabody	Covered	181	\$7,172
100	James House	Covered	121	\$8,046
132	Euclid Plaza	Covered	106	\$8,353
150	Towne XV (NSSS)	Covered	3	\$9,237
160	McMillan Manor (NSSS)	Covered	15	\$2,881
170	West Pine	< 100 Units	98	\$10,065
190	Parkview	Covered	259	\$8,729
220	Lafayette Apartments (SSSS)	Covered	28	\$8,845
230	California Gardens (SSSS)	Covered	14	\$7,856
260	Page Manor (NSSS)	Covered	5	\$8,570
280	Badenhaus Elderly (BH/BF)	Covered	89	\$7,450
340	LaSalle Park	Covered	144	\$11,480
350	Armand & Ohio (SSSS)	Covered	3	\$11,710
370	Cochran Plaza	<100 Units	70	\$9,390
380	Folsom (SSSS)	Covered	6	\$1,682
381	Samuel Shepard (NSSS)	Covered	11	\$13,513
382	Marie Fanger (SSSS)	Covered	5	\$14,073
383	Cupples (NSSS)	Covered		
384	Hodiamont (NSSS)	Covered		
390	Badenfest Elderly (BH/BF)	Covered	19	\$12,639
410	South Broadway (SSSS)	Covered	10	\$14,424
411	Walnut Park (NSSS)	Covered	12	\$19,077
412	Lookaway (NSSS)	Covered	13	\$14,419
420	Lafayette Townhomes (SSSS)	Covered	20	\$12,093
421	Tiffany Turnkey (SSSS)	Covered	20	\$5,950
440	Murphy Park I	Mixed Finance/HOPE VI	78	\$15,763
450	Murphy Park II	Mixed Finance/HOPE VI	53	\$16,515
460	Murphy Park III	Mixed Finance/HOPE VI	59	\$16,996
470	King Louis Square I	Mixed Finance/HOPE VI	34	\$15,303
480	Les Chateau	Mixed Finance/HOPE VI	30	\$14,552
490	King Louis Square II	Mixed Finance/HOPE VI	46	\$16,696
500	Renaissance Place @ Grand I	Mixed Finance/HOPE VI	60	\$24,575
510	McMillan Manor II (NSSS)	Covered	18	\$14,848
520	King Louis Square III	Mixed Finance/HOPE VI	21	\$14,711
540	Sr. Living @ Renaissance Place	Mixed Finance/HOPE VI	67	\$12,264
550	Gardens at Renaissance Place	Mixed Finance/HOPE VI	21	\$10,522
560	Cahill House	Mixed Finance/HOPE VI	79	\$14,694
570	Renaissance Place @ Grand II	Mixed Finance/HOPE VI	32	\$13,263
580	Cambridge Heights	Mixed Finance/HOPE VI	29	\$16,480
590	Renaissance Place @ Grand III	Mixed Finance/HOPE VI	50	\$17,648
600	Cambridge Heights II	Mixed Finance/HOPE VI	31	\$18,434
620	Sr. Living @ Cambridge Heights	Mixed Finance/HOPE VI	73	\$13,458
630	Arlington Grove	Mixed Finance/HOPE VI	65	\$13,177
640	North Sarah	Mixed Finance/HOPE VI	58	\$11,755
650	North Sarah II	Mixed Finance/HOPE VI	38	\$12,306
660	North Sarah III	Mixed Finance/HOPE VI	33	\$15,883
661	Kingsbury Terrace	Covered	121	\$11,274
670	Preservatoin Square I	Mixed Finance/HOPE VI	19	\$10,288
Grand Total			2,367	\$11,741
All Covered Developments			1,223	\$9,209

Combined Developments				
NSSS	Northside Scattered Sites	Covered	77	\$12,286
SSSS	Southside Scattered Sites	Covered	106	\$9,229
BH/BF	Badenhaus/Badenfest	Covered	108	\$8,363

*As of February 28, 2023

St. Louis Housing Authority
FY 2023 Annual Plan

ATTACHMENT #19

Section B.2 (b) – PHA Plan Update – Plan Elements Revised

Item 4 – Designated Housing Statement

Designated housing consists of four (4) developments, Les Chateaux (MO001-000048) – 40 units, Senior Living at Renaissance Place (MO001-000054) – 75 units, Cahill House (MO001-000056) – 80 units and Senior Living at Cambridge Heights (MO001-000062) – 75 units. SLHA requested a two-year extension of the Designated Housing Plan and received HUD approval on July 26, 2022. SLHA is eligible to extend the plan for additional 2-years and must receive HUD approval no later than September 5, 2024.

SLHA submitted a draft application for designated senior-only housing for the Parkview development (MO001-000019) in April 2023.

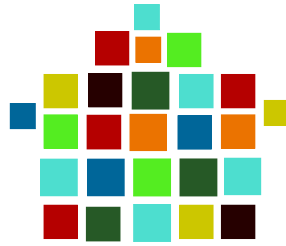
St. Louis Housing Authority
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ATTACHMENT #20

Affirmatively Furthering Fair Housing Analysis

The Affirmatively Further Fair Housing Analysis was submitted to HUD for review on October 21, 2013. HUD provided no response to the submission. Based on SLHA's very limited resources, it has chosen not to update the analysis on a piecemeal basis, but to update the analysis once it receives HUD's comments.

On January 19, 2023, HUD released its "Affirmatively Furthering Fair Housing" proposed rule with the comment period ending on April 10, 2023. SLHA will begin the process of creating an "Equity Plan" as required by the rule. Equity plans must be submitted to HUD no later than 365 days prior to the date for which a new five-year plan is due following the start of the fiscal year that begins on or after Jan. 1, 2026. The next five-year plan for SLHA is due in 2025.



ST. LOUIS
HOUSING
AUTHORITY

Affirmatively Furthering Fair Housing Analysis

I. Introduction

As a public housing authority (PHA), the St. Louis Housing Authority (SLHA) is required to submit an annual Agency Plan to HUD for approval, in accordance with the requirements of 24 CFR §903. As part of the Agency Plan, SLHA is required to certify that it complies with certain civil rights requirements and certify that it will affirmatively further fair housing (24 CFR §903.7 (o)). To be considered in full compliance with the affirmatively furthering fair housing requirements, a PHA needs to fulfill the requirements of 24 CFR §903.2(b) and;

1. Examine its programs or proposed programs;
2. Identify any impediments to fair housing choices within those programs;
3. Address those impediments in a reasonable fashion in view of the resources available;
4. Work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require PHA involvement; and
5. Maintain records reflecting these analyses and actions.

This document provides the required documentation to show SLHA's full compliance with the requirements to affirmatively further fair housing.

II. Fulfill the Requirements of 24 CFR §903.2(b)

Under the civil rights certification requirements at 24 CFR 903.7(o)(3), SLHA is required to fulfill the requirements of 24 CFR 903.2(b). 24 CFR §903.2(b) contains provisions that identify which public housing developments are subject to the requirements for deconcentration of poverty. This section does not impose any specific requirements on PHAs. However, 24 CFR §903.2(c) does impose specific requirements for implementation of deconcentration of poverty. SLHA assumes that the regulatory reference in 24 CFR §903.7(o)(3) is incorrect and that HUD's intention was to refer to the analysis requirements in 24 CFR §903.2(c). SLHA complies with HUD's deconcentration of poverty requirements under 24 CFR §903.2(c). The supporting documentation for the analysis is attached in Appendix A.

III. Examine SLHA's Programs and Proposed Programs

Neither HUD nor the public housing regulations offer any guidance for what an examination of a PHA program or proposed program entails under 24 CFR 903.7(o)(3)(i). To try to determine what an examination of its program is supposed to contain, SLHA reviewed references on HUD's website and materials published by advocacy organizations. The review of these materials suggest that the examination should include the following:

- A review of demographic information of program participants and applicants in relationship to the demographics of the community.

- An analysis of racially and ethnically concentrated areas of poverty in SLHA programs.
- A review of housing needs across protected classes.

SLHA has examined each of the three items as discussed below:

1. Demographic Review

SLHA operates two major HUD funded programs, public housing and Housing Choice Vouchers. The demographic information is shown in Tables 1-5 below.

Table 1
Racial Composition of Programs

Race	Public Housing				Housing Choice Vouchers			
	HOH	HOH %	Total Family Members	Total Family Members %	HOH	HOH %	Total Family Members	Total Family Members%
White	49	1.84%	61	1.02%	266	4.21%	409	2.46%
Black	2,605	97.68%	5,749	96.33%	6,026	95.36%	15,957	95.95%
Other	13	0.49%	158	2.65%	27	0.43%	262	1.58%

Table 2
Age of Participants in SLHA Programs

Age	Public Housing		Housing Choice Vouchers	
	Total Family Members	Total Family Members %	Total Family Members	Total Family Members%
1-17	2,630	44.07%	8,475	50.96%
18-61	2,711	45.43%	7,301	43.90%
62 and over	619	10.37%	848	5.10%

Table 3
Income Sources in SLHA Programs

Income Source	Public Housing		Housing Choice Vouchers	
	Number of Families	Percentage	Number of Families	Percentage
SSI	628	23.59%	1,752	27.75%
SS	948	35.61%	1,910	30.26%
Pension	162	6.09%	193	3.06%
TANF	226	8.49%	587	9.30%
Employment	842	31.63%	2,323	36.80%

Table 4
Average Income in SLHA Programs

Public Housing			Housing Choice Vouchers		
Average Income	Average Family Size	Percentage of Median	Average Income	Average Family Size	Percentage of Median
\$10,734	2.24	19.38%	\$11,447	2.63	18.39%

**Table 5
Disabled in SLHA Programs¹**

Public Housing	Housing Choice Vouchers
Percentage of Families Containing a Member with a Disability	Percentage of Families Containing a Member with a Disability
24.78%	20.07%

Both the public housing and HCV programs have long waiting lists. Families are allowed to be on multiple waiting lists at the same time. Therefore, the demographics for waiting list of both programs are combined and shown in Tables 6- 10 below.

**Table 6
Racial Composition of the Waiting List²**

Race	HOH	HOH %	Total Family Members	Total Family Members %
White	138	1.23%	238	0.89%
Black	11,023	98.03%	15,957	98.53%
Other	83	0.74%	262	0.57%

**Table 7
Age of Participants on the Waiting List**

Age	Total Family Members	Total Family Members %
1-17	15,694	48.99%
18-61	15,608	48.72%
62 and over	649	2.03%

**Table 8
Income Sources of Families on the Waiting List**

Income Source	Number of Families	Percentage
SSI	1,696	13.02%
SS	1,423	10.92%
Pension	85	0.65%
TANF	2,862	21.96%
Employment	4,972	38.16%

**Table 9
Average Income of Families on the Waiting List**

Average Income	Average Family Size	Percentage of Median
\$8,440	2.45	15.24%

¹ The number of persons with a disability is based on the number of persons receiving SSI. As SLHA is not allowed to inquire regarding the nature of the disability, SLHA has no data on the number of individuals that need special features in their unit.

² The last time the HCV waiting list was opened in 2007, a short form pre-application was taken. This process did not require the identification of racial composition for family members. Therefore, a significant number of family members are listed as race unidentified. For the purpose of this analysis, unidentified race is not considered.

Table 10
Disabled Families on the Waiting List³

Number of Families Claiming a Disability	Percentage of Families Claiming a Disability
933	2.91%

To compare SLHA programs to the surrounding community, SLHA used the Affirmatively Furthering Fair Housing (AFFH) performed by the City of St. Louis as its data source. It should be noted that the City’s AFFH was completed in March 2012, but is yet to be approved by HUD. The AFFH states the following information.

Race

The City of St. Louis is a racially diverse city with whites and African Americans being the two largest racial or ethnic groups. The City has had an African American majority population since the 2000 Census. The white population, representing a bare majority of the city in the 1990 Census, has declined dramatically from its post-war population peak. In 1950, over 700,000 white residents called the city home. By 2010, this number had dropped fully 80% to 140,000. The 1980 Census showed the first drop in the African American population. This trend has continued and has accelerated, with the 2010 Census showing a faster decline in the African American population than in the white population for the first time. In fact, despite an 8.1% decline of the white population between 2000 and 2010, the share of this population actually inched up from 43.8% to 43.9%.

Since the 1970s, the North Side has been largely African-American; while the South Side was predominantly white. The 2010 Census data reveals a growing and unprecedented level of integration in the southern portion of the City, while the northern section remains predominately African-American. The African American population grew most significantly in the south central and southeastern portions of the City. The share of African Americans also increased, to a lesser extent, in each of the southwest St. Louis neighborhoods, as well as in the northern extremes of the city. African American population declines were witnessed most heavily in several South St. Louis neighborhoods. The pattern is reversed for the white population, with whites showing substantial percentage gains in these areas and losses in the extreme southern and northern portions of the City.

Populations of other races and ethnicities reside largely in the southern half of the City. Hispanics tend to live in the southeastern portion of the city, with Asians residing primarily in south-central neighborhoods or the central corridor (e.g., Central West End). Most other racial groups are very small in number and constitute a small percentage of the overall population.

³ The number of disabled families is based on the number of families claiming a disability on the application.

The Racial Population Comparison (Table 11) shows the population breakdown by race of St. Louis City, St. Louis County, and the entire State of Missouri. St. Louis City and St. Louis County are separate political jurisdictions. St. Louis City and County taken together contain 22% of the population of Missouri. There are some similarities across the three jurisdictions. For instance, the Asian population is 2.9% of St. Louis City, 3% of St. Louis County, and 2% of the state as a whole, showing a very slight urban concentration. Looking at the white (non-Hispanic) and African American populations, however, one sees a distinct difference when comparing the three jurisdictions. Only 11% of the population of Missouri is African American, but the percentages increase in the population centers of St. Louis County (23%) and St. Louis City (49%). St. Louis City is the only county-equivalent (and the only major city) in the state of Missouri with the African-American population as the largest racial group.

Table 11
Racial Population Comparison

	St. Louis City		St. Louis County		Missouri	
Total Population	319,294		998,954		5,988,927	
White (non-Hispanic)	134,702	42.2 %	687,984	69%	4,850,748	81%
African American	156,389	49.0 %	231,801	23%	687,149	11%
American Indian	684	0.2%	1,632	0.2%	24,062	0.4%
Asian	9,233	2.9%	34,466	3%	97,221	2%
Two or More Races	6,616	2.1%	16,587	2%	106,142	2%
Other	540	0.2%	1,460	0.1%	11,135	0.2%
Hispanic	11,130	3.5%	25,024	3%	212,470	4%

Age

The population of St. Louis is comprised mostly of adults age 20 and over (75.5%), with 15.6% of the population being over the age of 60. The age spread for the City of St. Louis has some variations when compared to St. Louis County and the State of Missouri. St. Louis County and the State of Missouri are very similar when comparing the percentages in each age category, with the largest spread being 1.2%. The City's population makeup by age differs from that of the other two jurisdictions. The City has higher populations of people in their 20s and 30s, but lower percentages of people under 20 and over 60.

There has been a pronounced loss of children in the City over the past decade, except for the areas near downtown that experienced significant growth. The City lost roughly a third of its population age 5-14 from 2000 to 2010. Still, 67,539 children (under age 18) lived in the City as of April 1, 2010.

The young population is concentrated in the northern and southeastern sections of the city where the highest poverty rates exist. The Central Corridor has relatively few children.

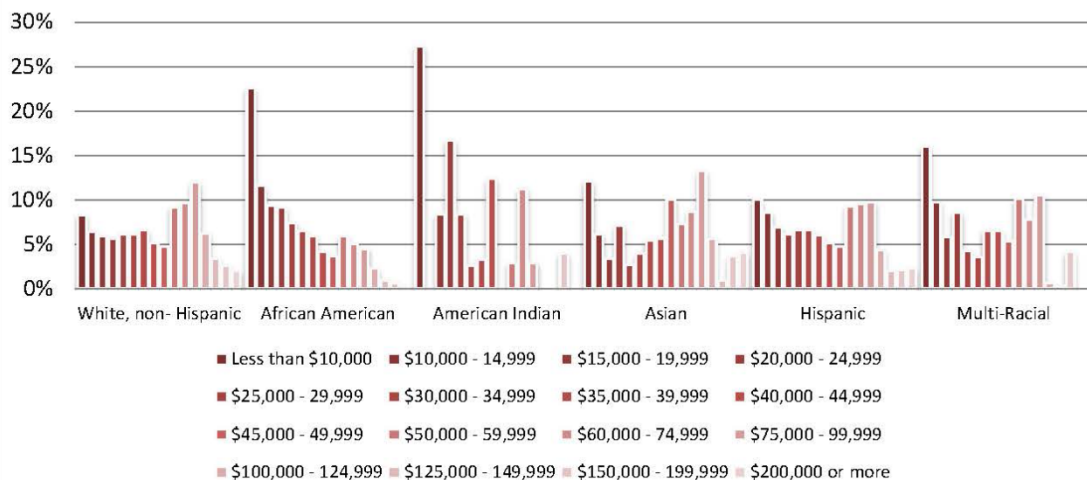
The elderly population consists of citizens who are 65 years old or older. The aging population presents unique challenges for the City of St. Louis. At about 16% of the population, the elderly comprise a smaller proportion of the population in the City than in St. Louis County and the State of Missouri. However, over half the City's elderly population have some sort of disability, and many require housing modifications and/or attendant care. Many elders live alone and are dependent on social services and nursing care in order to remain in their homes.

Income

Income is one of the greatest determinants of housing access. In this measure, St. Louis ranks well below its surrounding states and its suburbs. According to the 2005-2009 ACS, the median household income in the City of St. Louis was \$34,227, considerably less than the median income for the entire state of Missouri of \$46,005 and far less than the median income for St. Louis County of \$57,502. The table below highlights the disparity in income between the City of St. Louis and St. Louis County. In the City, 38% of households earn less than \$25,000 per year whereas in the County, 19.5% of households earn less than \$25,000. The disparity is even greater at the upper end of the income spectrum. For example, 24.6% of households in St. Louis County earn more than \$100,000, compared to 9.7% in St. Louis City.

Income distribution has an impact on the demand for low income housing. This demand is especially high for minorities, as the graph below demonstrates the variance of household income between different races and ethnicities. African Americans and American Indians have a much higher percentage of the population living with very low incomes.

Household Income Distribution in the City of St. Louis by Race/Ethnicity: 2009



Disability

About 14% of the St. Louis City population has some disability, exceeding the percentage in St. Louis County (11%) (2009 ACS). Of the working age population, about 13% are disabled, well above St. Louis County's 9% population of working-age disabled persons. There is an even larger discrepancy when comparing the population over 65. The estimated number of disabled elders soars to almost 44% of all elderly persons in the City, compared to 33% in the County. This creates a large challenge for the municipality to address the needs of an older population that shows significant rates of disability. The AI includes the table below.

Table 12
Disabled Population

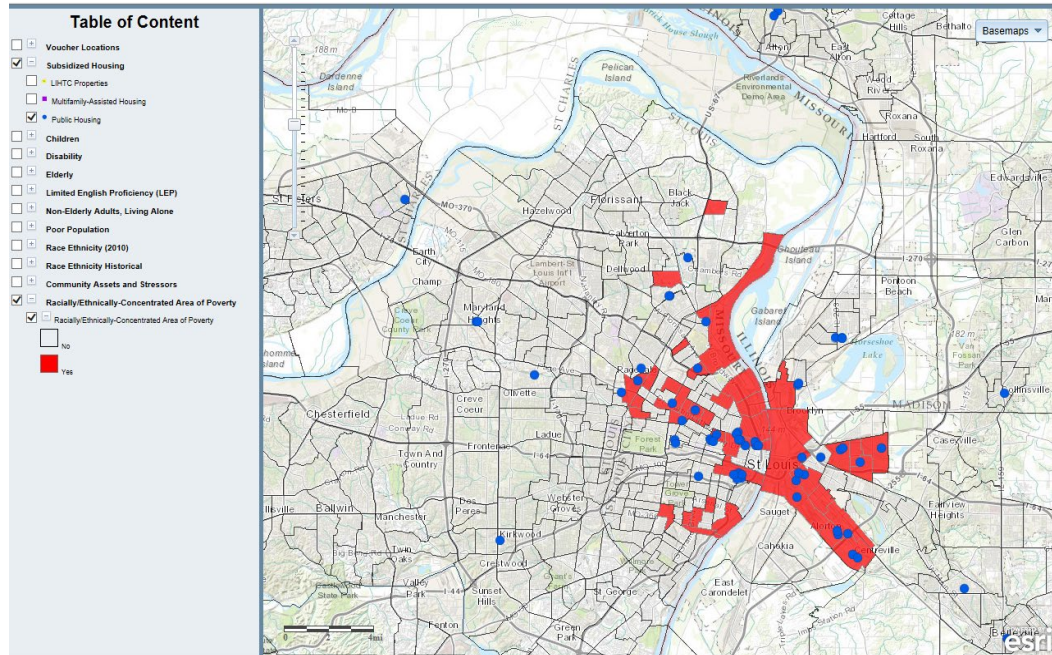
	Disabled Population from 18 to 64	Disabled Population 65 and Over
With any disability	13.4%	43.7%
With a hearing disability	1.6%	13.3%
With a vision disability	2.3%	8.7%
With a cognitive disability	6.8%	10.7%
With an ambulatory disability	7.2%	30.0%
With a self-care disability	2.7%	11.5%
With an independent living disability	5.1%	21.9%

It should be noted that neither the City's AI nor the American Community's Survey correlates disability and income, so it is difficult to determine the number of persons with a disability that qualifies for SLHA programs.

2. Analysis of Racially and Ethnically Concentrated Areas of Poverty in SLHA Programs

Public Housing

SLHA currently has 2,852 units of public housing. As SLHA's jurisdiction for public housing is only the City of St. Louis, the analysis includes only the City. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



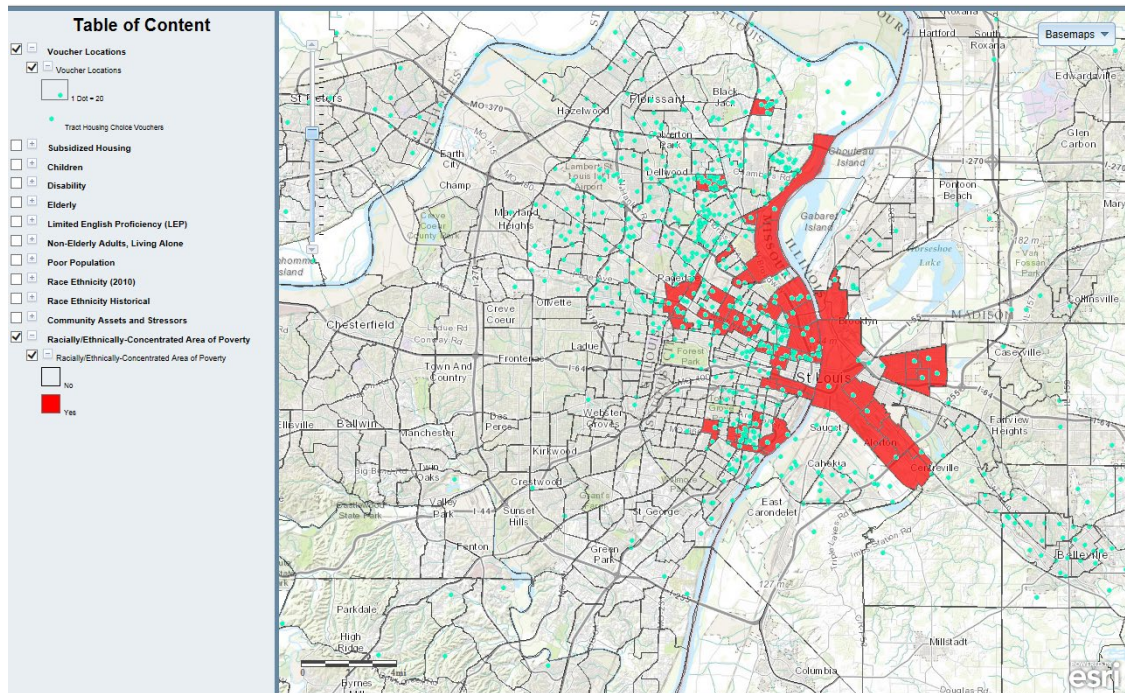
Of the 2,852 public housing units, 1,065 or 37% of the units are located outside census tracts identified as racially and ethnically concentrated areas of poverty and 1,787 or 63% of the units are located in census tracts racially and ethnically concentrated areas of poverty. Of the 1,787 units located in census tracts racially and ethnically concentrated areas of poverty, 693 or 24% of the units are located in mixed-finance/mixed-income developments.

Since 1999, SLHA has steadily worked to reduce the number of public housing units in racially and ethnically concentrated areas of poverty. In 1999, 78% of the public housing units were located in census tracts racially and ethnically concentrated areas of poverty. Since that time, SLHA has demolished or disposed of 2,702 public housing units. Of those units, 2,575 were located in census tracts racially and ethnically concentrated areas of poverty. In 15 years, there has been a 15% reduction in units located in census tracts racially and ethnically concentrated areas of poverty. SLHA's Agency Plan has goals to continue to develop additional housing using the mixed finance method and to remove an additional 143 public housing units that are located in a census tract that is a racially and ethnically concentrated area of poverty.

Housing Choice Vouchers

As of March 31, 2013, 6,739 vouchers were allocated to SLHA's HCV program. Of the allocated vouchers, 6,425 are currently leased. The utilization rate for the program is 101%. As the HCV program is budget based, SLHA must cease HCV lease-up until additional funding is available. Because of the mandatory federal budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program.

Unlike public housing, SLHA's jurisdiction for HCV is not limited to St. Louis City. SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of choices of housing areas. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



As the map indicates, many vouchers are currently utilized outside of racially and ethnically concentrated areas of poverty. An analysis shows that 3,095 of SLHA's vouchers are located in the County and 3,330 are located in the City. Of these vouchers, 1,593 or 24.79% are located in a racially and ethnically concentrated area of poverty. The concentration in the County is very low, with only 182 or 5.88% located in racially and ethnically concentrated areas of poverty. In the City, 1,411 vouchers or 42.73% are located in racially and ethnically concentrated areas of poverty.

The data shows that SLHA’s agreement with the County is effective in reducing racially and ethnically concentrated areas of poverty.

However, SLHA’s ability to continue its deconcentration efforts is severely impacted by mandatory budget cuts. To allow families the maximum mobility, SLHA has for many years adopted the highest allowable payment standard. Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits a family’s choice in housing, often forcing families to older, less desirable areas with less costly housing. These are areas more likely to be racially and ethnically concentrated areas of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower HCV payment levels in place to continue serving as many tenants as possible, leaving families fewer choices, but with some housing assistance rather than none.

3. Housing Needs Across Protected Classes

The City’s AI includes an Affordable Housing Needs table that analyzes income and rental data to determine the need for housing. The table reflects a great need for housing for the poorest residents and an over-supply of housing at the upper end of the cost spectrum.

Income	Households	Monthly Housing Costs	Number of Units	Net
Less than \$10,000	21,028	Less than \$300	12,016	-9,012
\$10,000 - 14,999	12,445	\$300 - 399	10,585	-1,860
\$15,000 - 24,999	20,885	\$400 - 599	29,038	8,154
\$25,000 - 34,999	18,310	\$600 - 799	27,608	9,298

The AI goes on to state that there are 37,103 extremely low-income households, with incomes at or below 30% of the area median income, in the City of St. Louis. More than 70% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden. The majority of these households are paying more than 30% of their household income for housing.

The AI identifies that there are 24,288 low-income households, with incomes between 30% and 50% of the area median income, in the City of St. Louis. About half of low-income households have some sort of housing problem. Almost 44% of

these households are paying more than 30% of their household income for housing and almost 11% are paying more than 50% of their household income for housing. The AI also states that there are 30,686 moderate-income households, with incomes between 50% and 80% of the area median income, in the City of St. Louis. Approximately 16% of these households are paying more than 30% of their household income for housing.

As the demographic information for the area shows, African-Americans and American Indians have a much higher percentage of the population living with very low incomes than other racial/ethnic groups. Therefore, the need is greatest among the African American and American Indian protected classes.

The AI for the City of St. Louis indicates that there is also a need for units with accessible features for persons with disabilities for the elderly and a smaller need for large families. SLHA's data indicates that the need for elderly housing is not as strong as the AI indicates because SLHA does not see the demand for elderly housing.

SLHA has four developments that are designated elderly only. While each has a waiting list, the lists are relatively short and always remain open. All of SLHA's other waiting lists are extremely long and most are closed. When they open, they generally open for very short periods of time and receive hundreds, sometimes thousands of applications. This leads SLHA to conclude that the need for elderly housing is being provided by the private market, limiting the demand on SLHA's units.

IV. Identify Any Impediments to Fair Housing Choice Within SLHA's Programs

As with the requirement for a PHA to examine its programs, there is very little HUD guidance on how a PHA is to identify the impediments to fair housing choice within its programs in order to satisfy the requirements of 24 CFR 903.7(o)(3)(ii). HUD's website states that PHAs may conduct their own AI or ensure their annual PHA Plans are consistent with the applicable jurisdiction's Consolidated Plan and AIs. As SLHA has extremely limited resources, it has chosen to use the AI performed by the City of St. Louis. As stated above, the City's AI was completed in March 2012, but is yet to be approved by HUD. The impediments to fair housing choice identified in the City's draft AI are as follows:

1. There are not enough rent-assisted units to meet the demand.
2. Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.
3. The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

4. Information about fair housing enforcement is not universally known to organizations working with people in protected classes.
5. Continuing uncertainty regarding the General Assembly's commitment to funding tax credit programs used to fund low-income housing construction and rehabilitation is leading to uncertainty in the public and private sectors about the future availability of these resources in the production of affordable housing.
6. There is a lack of a centralized method for distributing Community Development Block Grant (CDBG) funds to meet housing needs.
7. Occupancy permit requirements are unevenly applied across the City of St. Louis.
8. Real Estate Agents do not provide enough information about the amenities of the City of St. Louis to customers who want information about where to locate.
9. There has been a constriction in access to credit for low-income and minority borrowers.
10. Accessible housing units are not often available to people with disabilities.

Clearly, some of the impediments identified in the City's AI do not relate to SLHA programs. SLHA is not responsible for administration of the LIHTC program. Therefore, SLHA has little ability to impact Impediment 4. SLHA is not involved in the City's administration of the Community Development Block Grant (CDBG). Therefore, Impediment 6, which identifies the method of distribution of CDBG funds, is not relevant to SLHA. SLHA is not a real estate agent or a lender. Therefore, Impediments 8 and 9, which identify issues with information provided by real estate agents and issues with the availability of credit to low-income and minority buyers, are not relevant to SLHA. Instead, Impediments 1, 2, 3, 5, 7 and 10 are the only Impediments relevant to SLHA.

V. Address Those Impediments in a Reasonable Fashion in View of the Resources Available

To address the impediments in a reasonable fashion, each relevant impediment is addressed separately.

1. Impediment 1

Impediment: There are not enough rent-assisted units to meet the demand.

Impact: Many low-income residents have less access to quality housing.

Analysis: The analysis in the City's Draft AI states that there are 78,148 renter households in the City, 37% of which are cost burdened and 20% of which are severely cost burdened. When looking at extremely low-income, low-income, and

moderate income households, the situation is more dire. Approximately 73% of extremely low-income households, 49% of low-income households, and 22% of moderate-income households have one or more housing problems. The primary housing problem in each group is cost burden.

As of March 31, 2013, SLHA was assisting about 9,371 households, with over 15,000 families on the waiting list for public housing and for Housing Choice Vouchers (HCV). In September of 2000, SLHA was assisting 7,150 households. In the past 12 years, SLHA has increased the number of households served by 31% or over 2,200 households. According to the City's AI, even with this level of assistance, there are still approximately 20,000 households in need of such assistance that do not receive it.

SLHA's Agency Plan recognizes the need for more affordable housing. One of the SLHA goals is to increase the supply of affordable housing by building an additional 120 public housing units and obtaining an additional 250 Housing Choice Vouchers. However, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from reaching its goal. The effects of sequestration have been particularly devastating to the HCV program. Because of the budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program. While SLHA will make every effort to increase the supply of affordable housing, lack of funding from HUD may prevent SLHA from serving additional households.

2. Impediment 2

Impediment: Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.

Impact: Resident resistance may influence policy makers who might otherwise support housing development for protected classes. Resistant resident successes may lead to a perceived sanctioning of residents who have negative attitudes toward protected classes and perpetuates an unwelcoming environment

Analysis: As the City's AI states, NIMBY is an acronym standing for Not In My Back Yard. NIMBYism, as it is known, is the opposition of residents to developments in their neighborhood that putatively cause crime, lower property values, or generally have a negative effect. The name derives from the fact that many NIMBYs do not necessarily object to the proposed development; they object to its location near their home (i.e., "not in their backyard"). NIMBYism is often used in the context of dangerous or unwanted land uses, such as environmental hazards, in addition to social concerns, such as low income or transitional housing. It is commonly referred to as a problem in public policy and development circles due to the fact that NIMBYs

are often opposed to such land uses on principle without considering any facts or additional information about the development in question.

The City's AI goes on to state that in order to find the most affordable developable parcels and encounter the least NIMBY-related resistance in the community, developers often locate affordable housing projects in areas that are severely impacted with respect to poverty. The AI goes on to recommend that potential NIMBYism issues should be addressed in the planning process of a development. The AI concludes that negative attitudes regarding affordable housing should be addressed with better information about successful housing initiatives and by including the residents in planning for affordable housing initiatives, which would include their input and concerns and provide a means to get quality information to the neighbors before rumors and innuendos can overcome a development.

SLHA's Agency Plan includes a goal to increase awareness and understanding of programs, services and successes. As part of this strategic goal, SLHA has an objective to develop a community education program. The purpose of the community education program is to provide information to the SLHA clients, vendors, stakeholders and the general public about successful SLHA housing initiatives and to break down negative stereotypes about subsidized housing. In addition, in all new developments, SLHA requires the developer to engage the community and obtain community input in the planning process.

3. Impediment 3

Impediment: The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

Impact: Steady employment is difficult to find and maintain for protected class members with few resources. It is difficult for families in protected classes to find affordable housing and obtain quality education for their children.

Analysis: The City's AI states that most of the current development of low-income housing is developed by private developers with LIHTC financing and with partial financing through the Affordable Housing Commission or the Community Development Agency. Since private developers initiate the process, site selection is more about ease of obtaining the land at a cost that the project can support and avoiding problems with the neighborhood. Another factor that should be considered is that funding sources favor investment in distressed communities. Affordable housing developments provide jobs and stability in neighborhoods that would have little investment, if not for public investment. The AI states that this practice has led to the creation of an area that is defined by poverty.

The AI goes on to recommend that the City set goals to encourage developers to choose sites in less poverty impacted areas, increase regional planning to distribute

low-income housing to areas with good jobs and transportation, and encourage creative partnerships that will invest in low income areas of the City.

The AI concludes that large scale interventions, with guidelines for mix-income housing and universal design, may offer the best hope for revitalization for largely depleted neighborhoods with a high percentage of vacant land.

SLHA's Agency Plan goal for increasing the supply of affordable housing using the mixed-finance method of development is consistent with the recommendations in the AI. SLHA's strategy focuses on revitalizing entire neighborhoods using public and private resources as a catalyst to bring more redevelopment and economic opportunities to the areas. This creates the large scale intervention that the AI recommends.

SLHA, in partnership with the City and private developers, has completed developments using this revitalization strategy in four neighborhoods in the City. In all those neighborhoods, the strategy has resulted in substantial private investments and positive change in the economic composition of the area. For example, the revitalization of the Near South Side (formerly known as Darst-Webbe) has resulted in over \$100 million of private investment in the area. As a result of the revitalization, retail and commercial businesses have returned to an area that had seen many decades of disinvestment. The economic composition of the residents has changed, with a mix of public housing residents and market rate residents. Renaissance Place at Grand (formerly Blumeyer) has seen the same results, with private investments of over \$63 million and an increase in average income of 40%.

Unlike a purely private development, SLHA and its development partners very carefully consider the location of the developments, as they relate to jobs and transportation. Five of the six neighborhoods where revitalization is complete or underway are located near major employment centers. Two are immediately adjacent to downtown, with a third less than half a mile from downtown. Two others are located in mid-town, adjacent to the arts district, a major university and a large VA medical center, all potential sources of employment. All the developments are located on bus lines, giving the residents access to public transportation. In addition, there is a wide variety of social, recreational, educational and health care facilities located near each of the neighborhoods.

Consistent with the recommendations of the AI, SLHA has used a variety of very creative partnerships to bring investment to low-income areas. SLHA and its development partners used New Market Tax Credits and Empowerment Zone funds to build a new office building for SLHA, which contains a bank and a coffee shop in the Renaissance Grand neighborhood. The group also used New Market Tax Credits and public housing community facilities funds to build a new early childhood education center that will serve the communities on the near north side of downtown. When complete, the facility will provide 156 children with a high level of early childhood education.

The AI also recommends increasing regional planning to disburse low-income housing. SLHA's jurisdiction for new development of affordable housing includes only the City of St. Louis. While SLHA agrees that there should be increased regional planning, SLHA cannot build affordable housing outside its jurisdiction. However, SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of housing areas. For many years, SLHA adopted the highest allowable payment standard to facilitate the broadest range of housing choice possible.

Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits families' choices in housing, often forcing families to older, less desirable areas. These are the areas that are most likely to have a concentration of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower levels in place, leaving families with fewer choices. In a choice between continuing to provide assistance to current participants or providing families the maximum amount of choice in housing areas, SLHA opted for providing assistance to current participants. If the program is ever fully funded, SLHA will have to determine if it wants to assist more families or give current participants more choices.

The AI claims that the location of the majority of the low-income housing prevents residents from obtaining quality education for their children. It should also be noted that while the public schools in the City of St. Louis are generally low performing, there is a variety of educational choices for children to attend better schools. All students in the City have the option of applying to attend a magnet or charter school. These schools generally perform at a higher level than the traditional public schools. In addition, the children have the option of participating in the Voluntary Inter-district Choice program. This program will allow children to attend schools in the Parkway, Rockwood or Clayton school district. These school districts are all much higher performing districts than the City of St. Louis. These educational choices give residents access to educational facilities that are at least equivalent to the choices in non-impacted areas.

4. Impediment 4

Impediment: Information about fair housing enforcement is not universally known to organizations working with people in protected classes.

Impact: Fair Housing complaints may be under-reported.

Analysis: Information about fair housing enforcement is well known to SLHA. Through both its HCV Administrative Plan and public housing ACOP, SLHA makes every attempt to provide its stakeholders with the necessary information about fair housing enforcement.

The HCV Administrative Plan requires SLHA to take steps to ensure that families and owners are aware of applicable equal opportunity laws. As part of every family's oral briefing process, SLHA reviews information with HCV applicant families about equal opportunity requirements and the opportunity to rent in a broad range of neighborhoods. All applicable Fair Housing information and discrimination complaint forms are part of the voucher holder's briefing packet and available upon request. The owners' briefing includes information regarding Fair Housing requirements. In addition, the Housing Assistance Payments (HAP) contract, which all owners must sign to participate in the program, contains provisions that prohibit the owner from discriminating against any person because of race, color, religion, sex, national origin, age, familial status, sexual orientation, gender identity or disability.

SLHA's ACOP requires SLHA to take steps to inform public housing residents of all applicable civil rights laws. As part of the public housing orientation process, SLHA will provide information to public housing applicants about civil rights requirements. The ACOP further provides that if an applicant or resident advises SLHA that they believe that any family member has been discriminated against, SLHA will provide a copy of a discrimination complaint form to the complainant and provide the family with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

SLHA provides training, coordinated through HUD's Office of Fair Housing and Equal Opportunity (FHEO), to the HCV staff and the management agents' staff at least annually. The purpose of the training is to make sure the staff is aware of their obligations complying with fair housing requirements.

5. Impediment 7

Impediment: Occupancy permit requirements are unevenly applied across the City of St. Louis.

Impact: Tenants are renting properties that lack occupancy permits.

Analysis: The City's AI states that occupancy permits are one way that a municipality can protect the residents. They help control the quality of housing and limit overcrowding. Another benefit to occupancy permits is that tenants gain some leverage to have residences brought up to code and made safer before occupying these dwellings. The AI goes on to state that occupancy permits have a positive impact on fair housing.

While SLHA does not have the authority to issue occupancy permits, both the HCV and public housing programs have initial and annual inspection requirements and both programs have strict occupancy standards to prevent overcrowding. The annual inspection requirements review property quality much more often than an occupancy permit, which only requires an inspection at initial occupancy. SLHA inspection and occupancy standards remove this impediment to fair housing for participants in SLHA programs.

6. Impediment 10

Impediment: Accessible housing units are not often available to people with disabilities.

Impact: Persons with disabilities needing accessible housing do not have free and equal access to housing.

Analysis: The City's AI states that there is a great need for accessible housing in the City of St. Louis. An estimated 14% of the population has a disability and 7.2% has an ambulatory disability. When looking at just the senior population of the City, approximately 44% have a disability and 30% have an ambulatory disability. This is a large population of residents who have a disability when compared to St. Louis County, where 9% of the population are residents with disabilities.

SLHA fully complies with the requirements of Section 504 and has more than the required number of accessible units. Of SLHA's current inventory of 2,852 units, 7.89% of the units are accessible for individuals with mobility impairment and 3.23% of the units are accessible for individuals with hearing and visual impairments. A list of SLHA's current units is provided in Appendix B.

In addition, the inventory includes four developments designed for elderly families. These developments were all designed using the principles of universal design. Some of the universal design features that are included are: adequate clearances in front of each appliance and working surfaces, faucets with single lever handles and shallow bowls, slip resistant smooth surface flooring and low pile carpet, lever door handles instead of door knobs, adjustable height closet rods, view windows with 36" or less sill height, mirror to backsplash behind bathroom sink, mixer valve with pressure balance and hot water limiter, electrical outlets, light switches and thermostats at accessible heights.

All ground floor units and elevator units are adaptable designed. This design includes: accessible building entrance on an accessible route, accessible common and public use area, usable doors, accessible route into and through a unit, accessible environmental controls, reinforced bathroom walls for grab bars and usable kitchens and bathrooms.

In addition, to the extent practical all entry doors and interior corridors are no less than 3'-0" wide and all interior doors are no less than 2'-10" wide, allowing 32" of clear passage space.

The more recent family developments at Arlington Grove and North Sarah also are designed using universal design principles, as well as meeting all the requirements of Section 504 and the Fair Housing Act. SLHA exceeds its requirements for accessible units and houses a large number of disabled families. The developments proposed in SLHA's Agency Plan will add to the supply of accessible units. In addition, SLHA's Agency Plan commits to applying for Non-Elderly Disabled ("NED") vouchers from HUD, if funding is available and it can identify a viable community partner.

Unfortunately, as with SLHA's goal to increase the supply of affordable housing, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from being able to increase the supply of additional accessible units. If the 2014 appropriation levels remain at 2013 levels, there will likely not be funds available for NED vouchers or additional public housing units.

VI. Work with Local Jurisdictions to Implement Any of the Jurisdiction's Initiatives to Affirmatively Further Fair Housing that Require PHA Involvement

SLHA works closely with the various City development agencies, including the Community Development Agency, the Planning and Urban Design Agency, the St. Louis Development Corporation and the Affordable Housing Trust. SLHA participates in the City's Consolidated Plan process and the City verifies that SLHA's Agency Plan is consistent with the Consolidated Plan. The Planning and Urban Design Agency and the City's Department of Human Services were members of the SLHA Strategic Planning Committee that defined the goals and objectives presented in the Agency Plan. While the City's AI does not identify any jurisdictional initiatives that specifically require SLHA's involvement, as identified with each impediment discussed in Section V of this document, SLHA's Agency Plan and policies contain actions that will assist in reducing some of the impediments and affirmatively furthering fair housing.

VII. Maintain Records Reflecting These Analyses and Actions

This document will serve as the record of SLHA's completion of the analysis requirements of 24 CFR §903.7 (o). As a further record of its actions, SLHA will update the goals and objectives in the annual Agency Plan to document the progress on achieving the stated goals.

Appendix A – Deconcentration Analysis
(Reference Attachment 18 of the FY 2023 Agency Plan)

Appendix B – Section 504 Accessible Units under the ACC

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
MO1-2	MO1-020	Clinton-Peabody	1942	358	0	52	159	125	14	8	0	0	No	3.8	2	11	12							
		1002 Dillon				1											1							
		1234 Dillon				1											1							
		1302 Dillon				1											1							
		1136 Dillon					1										1							
		1517 Lasalle				1											1							
		1414 Lasalle						1									1							
		1462 Kealty					1										1							
		1400 Morrison				1											1							
		1416 Morrison						1									1							
		1424 Morrison					1										1							
		1440 Morrison				1											1							
		1401 Rutger				1											1							
		1411 Rutger						1									1							
		1425 Rutger					1										1							
		1441 Rutger				1											1							
		1474 Hickory						1									1							
		1400 Peabody				1											1							
		1432 Peabody				1											1							
		1434 Peabody				1											1							
		1465 Lasalle								1							1							
		1440 Castle					1										1							
		1245 S. 14TH					1										1							
		1408 Chouteau						1									1							
	Totals	Clinton-Peabody				11	6	5	0	1	0	0				11	12					195	18	
MO1-10	MO1-100	James House	1970	126	9	117	0	0	0	0	0	0	No	5	2	9	3							
		4310 S. FERDINAND																						
		UNIT 213				1											1							
		UNIT 313				1											1							
		UNIT 413				1											1							
		UNIT 513				1											1							
		UNIT 613				1											1							
		UNIT 713				1											1							
		UNIT 813				1											1							
		UNIT 913				1											1							
		UNIT 1013				1											1							
		UNIT 207				1											1							
		UNIT 307				1											1							
		UNIT 407				1											1							Rehab Comp 7-2012
	Totals	James House				12	0	0	0	0	0	0				9	3					40	5	
MO1-13B	MO1-132	Euclid Plaza Elderly	1973	108	10	95	3	0	0	0	0	0	No	3.8	2	10	0							
		5310 N. EUCLID																						
		UNIT 214				1											1							
		UNIT 308				1											1							
		UNIT 416				1											1							
		UNIT 509				1											1							

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				M
		UNIT 616				1											1								
		UNIT 709				1											1								
		UNIT 816				1											1								
		UNIT 201				1											1								
		UNIT 307				1											1								
		UNIT 401				1											1								
	Totals	Euclid Plaza Elderly				10	0	0	0	0	0	0				10	0						52	5	
MO1-15	MO1-150	Towne XV	1971	8	0	0	8				0	0	No	3.8	2	2	0								
		1070 Hodiament					1										1								
		1074 Hodiament					1										1								
		1064 Hamilton					1											1							
		1060 Hamilton					1										1								
	Totals	Towne XV				0	4	0	0	0	0	0				2	2						14	1	
MO1-16	MO1-160	McMillian Manor	1972	20	0	0	0	10	10	0	0	0	No	3.8	2	0	0						26	2	
MO1-17	MO1-170	West Pine	1971	99	0	94	5	0	0	0	0	0	Yes, 2004	3.8	2	12	9								
		4490 WEST PINE																							
		UNIT 207					1										1								
		UNIT 307					1										1								
		UNIT 407					1										1								
		UNIT 507					1										1								
		UNIT 607					1										1								
		UNIT 707					1										1								
		UNIT 807					1										1								
		UNIT 907					1										1								
		UNIT 1007					1										1								
		UNIT 201					1										1								
		UNIT 206					1										1								
		UNIT 306					1										1								
		UNIT 406					1										1								
		UNIT 506					1										1								
		UNIT 606					1										1								
		UNIT 706					1										1								
		UNIT 806					1										1								
		UNIT 906					1										1								
		UNIT 1006					1										1								
		UNIT 214						1									1								
		UNIT 414						1									1								
	Totals	West Pine				19	2									12	9					38	2		
MO1-18	MO1-180	Kingsbury Terrace	1971	120	0	110	10	0	0	0	0	0	No	3.8	2	10	3								
		5655 KINGSBURY																							
		UNIT 201					1										1								
		UNIT 202						1									1								
		UNIT 301					1										1								
		UNIT 401					1										1								
		UNIT 501					1										1								
		UNIT 601					1										1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		UNIT 701				1											1								
		UNIT 801				1											1								
		UNIT 901				1											1								
		UNIT 1001				1											1								
		UNIT 208				1												1							
		UNIT 308				1												1							
		UNIT 303						1										1							Rehab Comp 4-2009
	Totals	Kingsbury Terrace			0	11											10	3					29	5	
MO1-19	MO1-190	Parkview Elderly	1972	295	7	288	0	0	0	0	0	0	0	Yes, 2003	3.8	2	48	20							
		4451 FOREST PARK																							
		UNIT 201				1											1								
		UNIT 202				1											1								
		UNIT 301				1											1								
		UNIT 302				1											1								
		UNIT 401				1											1								
		UNIT 402				1											1								
		UNIT 501				1											1								
		UNIT 502				1											1								
		UNIT 601				1											1								
		UNIT 602				1											1								
		UNIT 701				1											1								
		UNIT 702				1											1								
		UNIT 801				1											1								
		UNIT 802				1											1								
		UNIT 901				1											1								
		UNIT 902				1											1								
		UNIT 1001				1											1								
		UNIT 1002				1											1								
		UNIT 1101				1											1								
		UNIT 1102				1											1								
		UNIT 1201				1											1								
		UNIT 1202				1											1								
		UNIT 1401				1											1								
		UNIT 1402				1											1								
		UNIT 223				1											1								
		UNIT 323				1											1								
		UNIT 423				1											1								
		UNIT 523				1											1								
		UNIT 623				1											1								
		UNIT 723				1											1								
		UNIT 823				1											1								
		UNIT 923				1											1								
		UNIT 1023				1											1								
		UNIT 1123				1											1								
		UNIT 1223				1											1								
		UNIT 1423				1											1								
		UNIT 224				1											1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments		
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V					
		UNIT 324				1											1									
		UNIT 424				1											1									
		UNIT 524				1											1									
		UNIT 624				1											1									
		UNIT 724				1											1									
		UNIT 824				1											1									
		UNIT 924				1											1									
		UNIT 1024				1											1									
		UNIT 1124				1											1									
		UNIT 1224				1											1									
		UNIT 1424				1											1									
		UNIT 604				1												1								
		UNIT 704				1												1								
		UNIT 804				1												1								
		UNIT 904				1												1								
		UNIT 1004				1												1								
		UNIT 1104				1												1								
		UNIT 1204				1												1								
		UNIT 1404				1												1								
		UNIT 214				1												1								
		UNIT 314				1												1								
		UNIT 414				1												1								
		UNIT 514				1												1								
		UNIT 614				1												1								
		UNIT 714				1												1								
		UNIT 814				1												1								
		UNIT 914				1												1								
		UNIT 1014				1												1								
		UNIT 1114				1												1								
		UNIT 1214				1												1								
		UNIT 1414				1												1								
	Totals	Parkview Elderly				68											48	20					97	4		
MO1-22	MO1-220	Lafayette Elderly	1971	26	8	18	0	0	0	0	0	0	No	3.8	2	1	0									
		UNIT 106				1											1									
	Totals	Lafayette Elderly				1											1	0					16	1		
MO1-23	MO1-230	California Gardens	1971	28	16	12	0	0	0	0	0	0	No	3.8	2	0	0									
MO1-26	MO1-260	Page Manor	1982	10	0	0	0	6	4	0	0	0	No	3.8	2	0	0					13	9	2-story townhouses		
MO1-28	MO1-280	Badenhaus Elderly	1974	100	52	48	0	0	0	0	0	0	No	3.8	2	8	4									
		8450 GAST PLACE																								
		UNIT 163				1												1								
		UNIT 257					1											1								
		UNIT 261				1												1								
		UNIT 273				1												1								
		UNIT 353					1											1								
		UNIT 357					1											1								
		UNIT 437					1											1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		UNIT 337			1												1								
		UNIT 175			1												1								
		UNIT 177			1												1								
		UNIT 184			1												1								
		UNIT 186			1												1								
		Totals			8	4										8	4						43	14	
MO1-34	MO1-340	LaSalle Park	1976	148	0	0	30	79	39	0	0	0	No	3.8	2	8	3								
		1013 Hickory					1									1									
		1029 Hickory					1									1									
		922 LASALLE					1									1									
		1021 Lasalle					1									1	1								
		1034 Lasalle					1									1									
		1120 South 11TH							1							1									
		1026 Hickory					1									1									
		1015 Morrison						1								1									
		927 Hickory					1									1									
		923 Hickory							1							1									
		1221 10TH						1								1									
		Totals				0	7	2	2							8	3					147	9		
MO1-35	MO1-350	Armand & Ohio	1982	4	0	0	0	3	0	1	0	0	Yes, 2004	3.8	2	0	0					4	0		
MO1-37	MO1-370	Cochran Plaza	1982	78	0	0	15	41	12	4	6	0	No	3.8	2	0	0					106	12		
		912 Cass					1									1	1								
		1413 N. 9th					1									1									
		911 Manhattan Place					1									1									
		1416 N. 10th							1							1									
		910 Manhattan Place						1								1									
		909 Ofallon					1									1	1								
		Totals					4	1	1							6	2			0		87	6		
MO1-38	MO1-380	Folsom	1983	6	0	0	2	2	2	0	0	0	No	3.8	2	3	1								2-story townhouses
		3919 Folsom #. 1A							1							1									
		3919 Folsom #. 1B					1									1									
		3919 Folsom #. 1E						1								1									
		3919 Folsom #. 2F						1								1									
		Totals					1	2	1							3	1					5	1		
MO1-38	MO1-381	Samuel Shepard	1982	16	0	0	4	4	8	0	0	0	No	3.8	2	4	2								
		2906 Samuel Shepard Unit. 1B						1								1									
		2906 Samuel Shepard Unit. 1E					1									1									
		2926 Samuel Shepard Unit. 1B						1								1									
		2926 Samuel Shepard Unit. 1F							1							1									
		2906 Samuel Shepard Unit. 1A							1								1								
		2926 Samuel Shepard Unit. 1A							1								1								
		Totals					1	2	3							4	2					14	3		

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HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
MO1-38	MO1-382	Marie Fanger	1984	6	0	0	2	2	2	0	0	0	No	3.8	2	0	2							
		4377 Norfolk # 1A							1								1							
		4377 Norfolk # 1E					1										1							
	Totals	Marie Fanger					1	1								0	2					5	2	
MO1-38	MO1-383	Cupples	1984	4	0	0	0	2	2	0	0	0	No	3.8	2	1	1							
		4704 Cupples # 1A							1							1								
		4704 Cupples # 2D					1									1								
	Totals	Cupples					1	1								1	1					4	2	
MO1-38	MO1-384	Hodiamont	1982	22	0	0	4	8	10	0	0	0	No	3.8	2	4	4							
		2521 Hodiamont # 1A							1							1								
		2521 Hodiamont # 1E						1								1								
		2521 Hodiamont # 2F					1									1								
		1949 Hodiamont # 1B					1									1								
		1949 Hodiamont # 2C						1								1								
		1949 Hodiamont # 2G						1								1								
		2505 Hodiamont # 2D						1								1								
		2505 Hodiamont # 1B					1									1								
	Totals	Hodiamont					6	2								4	4					15	4	
MO1-39	MO1-390	Badenfest Elderly	1983	21	0	18	3	0	0	0	0	0	No	3.8	2	2	0							
		8220 N. Broadway																						
		UNIT 201					1									1								
		UNIT 204					1									1								
	Totals	Badenfest Elderly				1	1									2	0					5	2	
MO1-41	MO1-410	South Broadway	1984	10	0	0	0	10	0	0	0	0	No	3.8	2	0	0							2-story townhouses
MO1-41	MO1-411	Walnut Park	1982	13	0	0	0	8	1	4	0	0	No	3.8	2	3	1							
		5519 Plover								1						1								
		5228 Gilmore					1									1								
		6030 Gareche					1									1								
		5205 Gilmore					1									1								
	Totals	Walnut Park					3		1							3	1					13	4	
MO1-41	MO1-412	Lookaway	1982	17	0	0	0	7	10	0	0	0	No	3.8	2	0	0							2-story townhouses
MO1-42	MO1-420	Lafayette Townhomes	1985	38	0	18	16	4	0	0	0	0	No	3.8	2	0	0							2-story townhouses
MO1-42	MO1-421	Tiffany Turnkey	1982	25	0	19	6	0	0	0	0	0	No	3.8	2	0	0							2-story townhouses
MO1-44	MO1-440	Murphy Park I	1997	93	0	0	39	42	8	3	1		No	3.8	2	3	0							
		1429 N. 19th St. # 101					1									1								
		1429 N. 19th St. #102					1									1								
		1931 Phipps #102					1									1								
	Totals	Murphy Park I					3	0								3	0							
MO1-45	MO1-450	Murphy Park II	2000	64	0	0	27	30	7	0	0	0	No	3.8	2	8	0							
		2033 Howard St.						1								1								
		2035 Howard St.					1									1								
		2115 Howard St.						1								1								
		1018 N. 19th St.					1									1								
		1022 N. 19th St.						1								1								
		1017 N. 18th St.					1									1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				M
		1021 N. 18th St.						1									1								
		1005 N. 18th St.						1									1								
	Totals	Murphy Park II					3	5									8	0							
MO1-46	MO1-460	Murphy Park III	-	65	0	0	25	30	5	4	1	0	No	3.8	2	7	0								
		1860B Mullanphy					1										1								
		2012B Mullanphy							1								1								
		2100A Mullanphy						1									1								
		2100C Mullanphy					1										1								
		2017A Mullanphy					1										1								
		2017B Mullanphy					1										1								
		2017C Mullanphy					1										1								
	Totals	Murphy Park III					5	1	1								7	0							
MO1-47	MO1-470	King Louis Square	2002	36	0	8	22	4	2	0	0	0	No	3.8	2	3	0								
		1620 S. 14th Street					1										1								
		1621 S. Tucker					1										1								
		1620 S. Tucker					1										1								
	Totals	King Louis Square				2	1										3	0							
MO1-48	MO1-480	Les Chateau	2003	40	0	30	10	0	0	0	0	0	No	3.8	2	6	2								
		1020 S. 14th Street																							
		UNIT 108					1										1								
		UNIT 114						1									1								
		UNIT 107					1										1								
		UNIT 109					1										1								
		UNIT 110					1										1								
		UNIT 210						1									1								
		UNIT 214					1										1								
		UNIT 310					1										1								
	Totals	Les Chateau				6	2										6	2							
MO1-49	MO1-490	King Louis Square II	2004	44	0	10	21	13	0	0	0	0	No	3.8	2	1	0								
		1437 Park						1									1								
	Totals	King Louis Square II						1									1	0							
MO1-50	MO1-500	Renaissance at Grand	2005	62	0	3	32	15	10	2	0	0	No	3.8	2	3	2								
		3435 A Delmar						1									1								
		3435 B Delmar							1								1								
		3332 A Bell					1										1								
		3305 A Franklin					1										1								
		3414 B Bell					1										1								
	Totals	Renaissance at Grand				2	1	1	1								3	2					223	16	
MO1-51	MO1-510	McMillan Manor II	2004/08	18	0	0	0	4	14	0	0	0	No	3.8	2	1	1								
		4569 McMillan						1									1								
		4567 McMillan						1									1								
	Totals	McMillan Manor II						2									1	1					34	1	
MO1-52	MO1-520	King Louis Square III	2006	24	0	8	0	12	4	0	0	0	No	3.8	2	3	0								
		1116 14th Street					1										1								
		1324 Lasalle					1										1								

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HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				M
		1101 13th St.							1																
	Totals	King Louis Square III				2			1								3	0							
MO1-54	MO1-540	Sen. Living @ Ren. Pl.	2006	75	0	69	6	0	0	0	0	0	No	3.8	2	5	3								
		3217 MLK																							
		UNIT 103				1											1								
		UNIT 104				1											1								
		UNIT 105				1											1								
		UNIT 106				1											1								
		UNIT 121				1											1								
		UNIT 126				1											1								
		UNIT 129				1											1								
		UNIT 305				1											1								
	Totals	Sen. Living @ Ren. Pl.				8										5	3					73	8		
MO1-55	MO1-550	Gardens @ Ren.	2006	22	0	20	2	0	0	0	0	0	No	3.8	2	1	3								
		3117 Thomas																							
		UNIT 102				1											1								
		UNIT 103				1											1								
		UNIT 206					1										1								
		UNIT 305				1											1								
	Totals	Gardens @ Ren.				3	1									1	3					31	2		
MO1-56	MO1-560	Cahill House	2006	80	0	77	3	0	0	0	0	0	No	3.8	2	10	2								
		1919 O'Fallon																							
		UNIT 110				1											1								
		UNIT 121				1											1								
		UNIT 130					1										1								
		UNIT 203				1											1								
		UNIT 210				1											1								
		UNIT 216				1											1								
		UNIT 230				1											1								
		UNIT 240					1										1								
		UNIT 303				1											1								
		UNIT 310				1											1								
		UNIT 316				1											1								
		UNIT 330				1											1								
	Totals	Cahill House				10	2									10	2					52	2		
MO1-57	MO1-570	Ren Pl at Grand II	2006	36	0	0	27	7	2	0	0	0	No	3.8	2	3	0								
		822 A Leonard						1									1								
		822 B Leonard							1								1								
		3222 B Bell Ave					1										1								
	Totals	Ren Pl at Grand II				0	1	1	1							3	0					110	6		
MO1-58	MO1-580	Cambridge Heights	2007	46	0	9	21	9	5	2	0	0	No	3.8	2	6	2								
		1435 8th St.				1											1								
		816 Dickson St.						1										1							
		1312 8th St.						1										1							
		704 A Dickson St.				1											1								
		1411 B 7th St.					1										1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments	
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V				
		1401 A 7th St.				1											1								
		1314 A 7th St.				1											1								
		1309 B 7th St.					1										1								
	Totals	Cambridge Heights				4	2	2	0							6	2						125	7	
MO1-59	MO1-590	Ren Pl at Grand III	2008	50	0	6	11	21	10	2	0	0	No	3.8	2	8	0								
		1101 A N. Compton					1										1								
		3217 A School St.						1									1								
		1100 C N. Leonard					1										1								
		3203 A Renaissance					1										1								
		1201 A N. Leonard							1								1								
		1201 B N. Leonard						1									1								
		1216 A Josephine Baker					1										1								
		1216 C Josephine Baker					1										1								
	Totals	Ren Pl at Grand III				1	4	2	1							8	0						153	11	
MO1-60	MO1-600	Cambridge Heights II	2009	44	0	2	15	16	7	4	0	0	No	3.8	2	3	2								
		1311 8th St.						1									1								
		835 Carr St.								1							1								
		1207 A 8th St.					1										1								
		1109 A 8th St.					1										1								
		1109 B 8th St.					1										1								
	Totals	Cambridge Heights II				1	2	1	0	1						3	2						102	9	
MO1-62	MO1-620	Sr. Living at Cambridge	2011	75	0	72	3	0	0	0	0	0	No	3.8	2	3	2								
		728 Biddle																							
		UNIT 101					1										1								
		UNIT 107					1										1								
		UNIT 126						1									1								
		UNIT 201					1										1								
		UNIT 205					1										1								
	Totals	Sr. Living at Cambridge				4	1	0	0							3	2						54	4	
MO1-63	MO1-630	North Sarah	2012	59	0	34	25	0	0	0	0	0	No	5	2	5	2								
		4091 Finney Ave, Unit 106					1										1								
		4075 Finney Ave, Unit A						1									1								
		4075 Finney Ave, Unit B						1									1								
		4059 Finney Ave						1									1								
		4078 CD Banks Ave, Unit A						1									1								
		4078 CD Banks Ave, Unit B						1									1								
		4058 CD Banks Ave					1										1								
	Totals	North Sarah				2	5									5	2						120	8	
MO1-64	MO1-640	Arlington Grove	2012	70	0	47	23	0	0	0	0	0	No	5	2	5	2								
		1627 Burd Ave					1										1								
		1632 Clara Ave					1										1								
		5551 MLK Blvd., Unit 210					1										1								
		1617 Burd Ave, Unit 101					1										1								
		1522 Clara Ave, Unit A						1									1								
		1522 Clara Ave, Unit B						1									1								
		5568 Theodosia						1									1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
Totals			Arlington Grove				4	3								5	2					122	8	
MO1-65	MO1-650	North Sarah II	2014	46	0	5	32	25	0	0	0	0	No	2.3	0.92	5	3							
		4145 CD Banks Ave, Unit A						1								1								
		4115 CD BANKS AVE						1									1							
		4132 FINNEY AVE						1									1							
		4110 FINNEY AVE						1									1							
		4105 CD Banks Ave, Unit 101						1								1								
		3903 CD Banks Ave, Unit 110					1									1								
		3903 CD Banks Ave, Unit 203						1								1								
		3902 CD Banks Ave, Unit 203						1								1								
Totals			North Sarah II				1	5	2							5	3					112	8	
MO1-66	MO1-66	North Sarah III	2017	35	0	13	43	21	0	0	0	0	No	1.75	0.7	5	3							
		1034 Whittier Street					1									1								
		1050 Whittier Street					1									1								
		1022 Whittier Street						1								1								
		1028 Whittier Street					1									1								
		4158 CD Banks Ave.						1									1							
Totals			North Sarah III				3	2	0							4	1					82	6	
MO1-67	MO1-67	Preservation Square	2022	19	0	31	83	17	0	0	0	0	No	5	2	14	1							
		1808 Cass Avenue					2									1								
		1800B Cass Avenue						3								1								
		1714 Cass Avenue					2									1								
		1725 Cochran Place					2									1								
		1723 Cochran Place					2									1								
		1819A Cochran Place					2									1								
		1452 Hogan Street					2									1								
		1822 Cass Avenue					2									1								
		1700 Cass Avenue					2									1								
		1702 Cass Avenue					2									1								
		1619 Cochran Place					2									1								
		1631 Cochran Place					2									1								
		1715A Cochran Place					2									1								
		1703 Cochran Place					2									1								
		1812 Cass Avenue					2										1							
Totals			Preservation Square				0	28	3				No			14	1					121	9	
GRAND TOTAL				2809	8	184	95	52	16	3	0	0		8.86%	3.45%	249	97	0	0	0	0	2376	204	

MEMORANDUM

To: Board of Commissioners

Through: Alana C. Green, Executive Director

From: Fran Bruce, Planning and Procurement Manager

Date: June 7, 2023

Subject: Resolution No.
Approving and Authorizing the Submission of the Agency Plan Annual Submission for Fiscal Year 2023

Board approval is requested to authorize the St. Louis Housing Authority to submit the Agency Plan Annual Submission for fiscal year 2023.

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

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

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

1. Comments and Response Summary from Public Hearing
 - Comments and Responses to Agency Plan Section B.6
2. Flyers and Minutes from Town Hall Meetings
3. Certification of Compliance
4. Civil Rights Certification

**Approving and Authorizing Submission of the Agency Plan
Annual Submission for Fiscal Year 2023**

WHEREAS, the St. Louis Housing Authority (SLHA) desires to submit the Agency Plan Annual Submission for fiscal year 2023; and

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

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

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

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

WHEREAS, SLHA conducted a virtual Public Hearing on June 14, 2023, to obtain public comments regarding the proposed Annual Submission; and

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

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

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to submit the Agency Plan Annual Submission for fiscal year 2023 to HUD.

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

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

Approved by the Board of Commissioners on June 22, 2023



MEMORANDUM

To: Board of Commissioners

Through: Alana C. Green, Executive Director

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

Date: June XX, 2023

Subject: Resolution No. 29XX
Approving and Authorizing the St. Louis Housing Authority Capital Fund Five-Year Plan and the FFY 2023 Capital Fund Annual Statement

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

The St. Louis Housing Authority (SLHA) prepared a revised Capital Fund Five-Year Plan (Plan) in conjunction with the 2023-2027 Agency Five-Year Plan and Annual Plan. SLHA provided a 45-day comment period and conducted a public hearing on June 14, 2023. The Capital Fund Five-Year Plan was available to residents and the St. Louis TAB (the City-Wide RAB) prior to the hearing. The comments to the Capital Fund Five-Year Plan and the responses are attached.

In addition, HUD revised the process for accepting annual Capital Fund grants. The ACC amendments are now deemed executed when the first funds are drawn from the grant. Board approval of individual ACC amendments is no longer required. Additionally, HUD no longer provides Replacement Housing Factor Capital Fund grants. SLHA was notified on February 17, 2023 that its FFY 2023 Capital Fund allocation is \$8,977,188.00. SLHA completed the FFY 2023 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

A Physical Needs Assessment (PNA) has been finalized and accepted by SLHA and the data has been used to realign the capital fund for the five-year 2023-2027 planning period.

Board approval of the SLHA Capital Fund Five-Year Plan, FFY 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 St. Louis Housing Authority Capital Fund Five-Year Plan
and the FFY 2023 Capital Fund Annual Statement**

WHEREAS, the St. Louis Housing Authority (SLHA) has prepared the Capital Fund Five-Year Plan and the FFY 2023 Capital Fund Annual Statement in accordance with 24 CFR § 903.7(g) and the guidance provided by HUD; and

WHEREAS, the SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain comments on the proposed Capital Fund Five-Year Plan and FFY 2023 Capital Fund Annual Statement; and

WHEREAS, the SLHA has published notices and made the proposed Capital Fund Five-Year Plan and FFY 2023 Capital Fund Annual Statement available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

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

WHEREAS, the SLHA conducted a Public Hearing on June 14, 2023 to obtain public comments regarding the proposed Capital Fund Five-Year Plan; and

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

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

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to take all actions necessary to obtain HUD approval and implement the Capital Fund Five-Year Plan and the FFY 2023 Capital Fund.