



ST. LOUIS
HOUSING
AUTHORITY



LAFAYETTE APARTMENTS

BOARD OF COMMISSIONERS

REGULAR MEETING

MAY 28

2026



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

PUBLIC NOTICE OF OPEN MEETING

Notice is hereby given that the St. Louis Housing Authority will conduct an **open meeting** of the commissioners of the St. Louis Housing Authority at 4:30 p.m. on Thursday, May 28, 2026, via **Zoom***. The tentative agenda of this meeting includes items shown on the attached agenda. The tentative agenda of this meeting also includes a vote to close part of this meeting pursuant to Section 610.021:

- RSMO 610.021(3) - Hiring, firing, disciplining or promoting of particular employees
- RSMO 610.021(2) - Leasing, purchase or sale of real estate
- RSMO 610.021(13) - Individually identifiable personnel records
- RSMO 610.021(14) - Records which are protected from disclosure by law

DATED: May 22, 2026

ST. LOUIS HOUSING AUTHORITY

Attachment

***Instructions For Joining Zoom**

Meeting ID: 939 278 0715

Via Smart Phone or Computer:

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

Via Phone:

1-312-626-6799

Meeting ID: 939 278 0715

Passcode:536879

BOARD OF COMMISSIONERS, ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING, MAY 28, 2026, 4:30 P.M.
ST. LOUIS HOUSING AUTHORITY, 3520 PAGE BOULEVARD
ST. LOUIS, MISSOURI 63106
AGENDA

ROLL CALL

CONSENT AGENDA

1. Approval of Minutes, Annual Meeting, April 23, 2026

RESIDENTS' COMMENTS ON AGENDA ITEMS

ITEMS FOR INDIVIDUAL CONSIDERATION

2. **Resolution No. 3065**
Authorizing and Approving the St. Louis Housing Authority's Artificial Intelligence Policy Framework
3. **Resolution No. 3066**
Authorizing and Approving the St. Louis Housing Authority's Minor Safety and Protection Policy for Service Providers and Partners
4. **Resolution No. 3067**
Authorizing and Approving Revisions to the Sunshine Law Compliance Policy

CHAIR'S REPORT

DIRECTOR'S REPORT

RESIDENTS' CONCERNS

COMMISSIONERS' CONCERNS

SPEAKERS TO ADDRESS THE BOARD

EXECUTIVE SESSION

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

ADJOURNMENT

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

APPROVAL OF MINUTES
APRIL 23, 2026

BOARD OF COMMISSIONERS
ST. LOUIS HOUSING AUTHORITY
REGULAR MEETING
APRIL 23, 2026
4:30 p.m.

CALL TO ORDER

The Board of Commissioners of the St. Louis Housing Authority held a Regular Meeting via Zoom on Thursday, April 23, 2026. Chair Regina Fowler called the meeting to order at approximately 4:33 p.m.

Present: Rachel D'Souza
Dara Eskridge
Regina Fowler
Sal Martinez
Constantino Ochoa, Jr.
Andrea Powell

Absent: Pamela Bush

CONSENT AGENDA

Approval of Minutes

Commissioner Martinez moved to approve the minutes of February 26, 2026. Commissioner Eskridge seconded the motion. The motion passed with commissioners Eskridge, Fowler, Martinez and Powell voting aye.

ITEMS PREVIOUSLY APPROVED BY TELEPHONE VOTE

Resolution No. 3062

(For Informational Purposes Only – Approved by Telephone Vote on March 25, 2026)
Authorizing and Approving the St. Louis Housing Authority's 2030 Strategic Plan.

Ms. Barnes stated that the St. Louis Housing Authority's (SLHA) 2030 Strategic Plan was discussed in depth at the February 26, 2026 meeting and Resolution No. 3062 was submitted for board approval via a telephone vote on March 25, 2026. She noted that the Strategic Plan structures the agency's work around four pillars: community, opportunity, respect and excellence, and it outlines strategies that the agency attends to take over the next five years to advance its mission, revitalize its portfolio and to provide new opportunities for its residents, while also strengthening the organization's internal capacity through professional development and digitalization of existing workflows. She said a copy of the strategic plan is available online and could be emailed to anyone who would like a copy directly. Ms. Barnes stated that she was grateful for input from the board and feedback from the public housing residents, Section 8 participants and community partners, including landlords who participate in the Section 8 program. She noted that SLHA tried to incorporate as much of their recommendations as it could, as well as include and preserve as many ideas as possible of SLHA's team. She stated that SLHA has a robust and detailed plan and has already started implementing some of the strategies and ideas set forth. She thanked the board for voting the Strategic Plan into action and indicated that she would keep the commissioners updated on the agency's progress.

Commissioner Fowler stated that the Strategic Plan was very well thought out and every group was considered. She thanked Ms. Barnes and the staff for putting it together.

ITEMS FOR INDIVIDUAL CONSIDERATION

Resolution No. 3063

Authorizing and Approving the Execution of the Capital Fund Program (CFP) Amendment to the Consolidated Annual Contributions Contract and the Capital Fund Annual Statement for Fiscal Year 2026.

Presenting Resolution No. 3063, Ms. Barnes stated that execution of the amendment to the Consolidated Annual Contributions Contract (ACC) for the Capital Fund Program is an annual request. She said SLHA received an award of \$9.1 million from HUD for fiscal year 2026 and would like to move forward with executing the ACC amendment and incorporating the funds into some of its planning efforts. She noted that SLHA currently has over \$200 million in capital needs across its portfolio due to deferred maintenance and chronic underfunding at the federal level. She said while grateful for the \$9.1 million, additional funds and even more extensive support are necessary to bring the agency's portfolio up to fully modernized status. She stated that she and Jason Hensley, Director of Real Estate Development and who oversees and administers the agency's Capital Fund Program, could answer any questions that the board may have about how these funds might be used in the future.

Commissioner Fowler asked what does SLHA do about the \$201 million gap.

Ms. Barnes stated that SLHA will prioritize the highest needs areas where it can. She said it is known that funding for public housing has been chronically decreasing over the past 10 to 15 years, which is part of the reason why SLHA is prioritizing repositioning of its portfolio. She noted that SLHA currently has 30% of its portfolio in some stage of asset repositioning and additional properties have been identified. She said SLHA is moving as quickly as it can with very limited capacity and resources to position each of the public housing sites and she acknowledged Mr. Hensley and his team for working extremely hard to reposition the agency's portfolio.

Commissioner Fowler asked if there were any further questions regarding Resolution No. 3063.

There were none.

Commissioner D'Souza moved to approve Resolution No. 3063. Commissioner Martinez seconded the motion. The motion passed with commissioners D'Souza, Eskridge, Fowler, Martinez and Powell voting aye.

DIRECTOR'S REPORT

Ms. Barnes formally reintroduced Val Joyner. She stated that Ms. Joyner was SLHA's Director of Communications and is now the agency's Chief of Staff. She noted that Ms. Joyner started her role on April 6, 2026 and brings much intelligence, competence and new ideas to some of the agency's processes.

Ms. Barnes stated that SLHA is officially in the development phase of its 2026 Agency Plan, which is a community-driven process. She noted that the draft plan is anticipated to be made available for public comment and feedback starting May 1, 2026. She said to ensure that there is broad engagement and opportunities for feedback, SLHA will be hosting a virtual town hall meeting on May 27, 2026, followed by an in-person public hearing on June 15, 2026. She stated that SLHA has had initial discussions with the City-Wide Tenant Advisory Board under the leadership of Benita Jones and SLHA will continue to solicit their direct feedback over the next couple of weeks to ensure that their voices remain central to SLHA's strategies and interventions.

Providing an update on the Public Housing Program, Ms. Barnes stated that strengthening occupancy levels and reducing unit downtime remain a priority for SLHA. She said SLHA recently met with the local HUD field office to discuss some of the agency's vacancy reduction strategies, most notably long-term vacancies, which are vacancies over 180 days. She noted that the long-term vacancies are now on a steady downward trend and that the Property Management team is doing a really good job of pulling those units and making them ready for families in need with support from SLHA's Development and Modernization team and with the funding support received from the City of St. Louis. She acknowledged their efforts and hard work in that regard.

Ms. Barnes stated, for the Housing Choice Voucher (HCV) Program, that the agency is continuing at 100% utilization and is currently serving over 5,500 families. She said while at 100% utilization for the HCV program, the agency is leveraging the stability to expand additional economic pathways for its current participants and recently relaunched the Bridge to Homeownership Program. She noted that SLHA hosted its first Homeownership Accelerator on April 20, 2026 to assist its first cohort of 51 HCV families in starting their homeownership journey. She said it was an amazing event with a lot of support from communities,

lending community and real estate community. Ms. Barnes stated that SLHA recently partnered with St. Louis Development Corporation, Land Reutilization Authority, Invest STL and other partners to participate in a national HCV homeownership cohort hosted by the Center for Community Progress. She said SLHA is doing what it can with the resources that it has and is exploring new and creative ways to expand homeownership opportunities across its portfolio.

Highlighting SLHA's 3rd Annual Jamboree, Ms. Barnes stated that the event was held under the leadership of SLHA's Director of Resident and Community Engagement, Vontriece McDowell, and her ROSS team at Harris Stowe State University on March 19, 2026. She noted that there were over 100 attendees at the event, which featured a keynote from Sam Coleman, President of Ascend STL, SLHA's nonprofit arm. She said the residents had an opportunity to connect with over 25 community vendors and vital services, such as health screenings, free mammograms, and budgeting and financial counseling advice. She acknowledged the Resident Initiatives team's continued hard work and the success of the recent community partnerships.

Concluding, Ms. Barnes acknowledged Sergeant Regiana Moore with the St. Louis Metropolitan Police Department and deferred to her to provide an update on activities of the Housing Authority Unit.

Sgt. Moore stated that it was her first time attending the meeting. She said she was not sure if the crime stats were read or if they were given to SLHA.

Ms. Barnes stated that a general update was usually given on the stats.

Sgt. Moore stated that since SLHA has developments in quite a few neighborhoods, she would provide a 28-day update of what had and/or had not happened in those neighborhoods. She noted that there had been three robberies in the Covenant Blu neighborhood and that a suspect had been identified. She said they have a strong lead and are working on getting that person in custody. She stated that in the LaSalle neighborhood, there are issues with some neighbors, which is being worked out with SLHA, and in the Columbus Square neighborhood, there had been two murders, two aggravated assaults, one burglary, one felony theft and one auto theft.

Commissioner Martinez noted that Columbus Square is an entire city neighborhood in which SLHA has some housing portfolio. He asked Sgt. Moore, for clarification, if the stats for Columbus Square included things that happened outside of SLHA's ownership.

Sgt. Moore responded, "Correct."

Commissioner Martinez stated that he wanted that distinction made to ensure that everybody understood that Sgt. Moore was not specifically talking about SLHA properties, but the entire neighborhood.

Sgt. Moore noted that SLHA has several units in different neighborhoods and that the police department does its stats compared to neighborhood districts and area stations. She said she was reading the stats as a total and the incidents may not have anything to do with SLHA.

Ms. Barnes stated that it might be helpful if Sgt. Moore provided trends, such as an increase or decrease in any particular neighborhood or in any area.

Sgt. Moore stated that the robberies occurring in the Covenant Blu neighborhood was the only location SLHA had an uptick. She said most areas in neighborhoods where SLHA developments are located remained flat, with no crime reported, no upticks or no police services needed, other than the neighbor dispute in the LaSalle neighborhood that is being worked out with SLHA. She shared that the LaSalle neighborhood may get an uptick in car cloutings when Cardinals baseball games are held. She noted that the LaSalle neighborhood consists of Tucker, Chouteau, 9th and Lebanon and other streets and people come into the city looking for somewhere close to the stadium to park, even though they have been advised not to park in the residential neighborhoods, which include Clinton-Peabody, LaSalle Park and any other SLHA complex in that neighborhood.

Commissioner Fowler noted that the crime stats were in the report and she thanked Commissioner Martinez for clarifying that the stats are for an entire city neighborhood and not specifically a property of SLHA.

Sgt. Moore stated that it seemed like SLHA had a lot going on, but it was the neighborhood as a whole.

Commissioner Martinez shared that he lives near LaSalle Park Apartments. He said everybody who breaks into one of those cars does not live in the LaSalle neighborhood. He stated that that may be an expectation or something that people take for granted, but it is not true. He said he wanted to make that clear.

Sgt. Moore agreed.

RESIDENT CONCERNS

Benita Jones, president of the North Sarah Tenant Association, stated that she has a new position, but the same mission. She shared that she is now the president of the City-Wide Tenant Advisory Board. She also shared that she had some issues, but she and Ms. Barnes had worked them out. She noted that she and Ms. Barnes are still working together.

Commissioner Fowler thanked Ms. Jones and stated that SLHA is always happy to keep her working for the residents and the agency.

Ms. Barnes acknowledged Ms. Jones and indicated that she is good at what she does in supporting the residents.

Commissioner Powell stated that although she is a resident commissioner, she is also a tenant and the treasurer of the West Pine TAB. She asked what happens if a resident threatens another resident. She said she was threatened by another resident and she filed a complaint, but the resident threatened her again on April 7, 2026. She asked what could be done about that.

Ms. Barnes stated, for general information, that any resident being threatened by another resident should first escalate it to their manager and then to SLHA's Director of Property Management. She said she would talk to Commissioner Powell to get more specific information to get the matter addressed.

ADJOURNMENT

Commissioner D'Souza moved to adjourn the meeting into Executive Session. Commissioner Eskridge seconded the motion. The vote was in favor of passing the motion with all commissioners voting aye. The meeting thereupon adjourned at 5:00 p.m.

Regina Fowler, Chair
Board of Commissioners
St. Louis Housing Authority

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

(SEAL)

RESOLUTION No. 3065

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Executive Director

Date: May 13, 2026

Subject: Resolution No. 3065
Authorizing and Approving the St. Louis Housing Authority's Artificial Intelligence Policy Framework

By this memorandum, the St. Louis Housing Authority (SLHA) respectfully requests board approval of the proposed Artificial Intelligence (AI) Acceptable Use Policy for the agency.

As AI technologies become increasingly integrated into workplace operations, SLHA recognizes the importance of establishing clear standards governing their responsible, ethical, and secure use. While AI tools may improve efficiency, productivity, and innovation, they also present potential risks involving cybersecurity, misinformation, and unauthorized disclosure of confidential information.

The proposed policy was developed collaboratively by SLHA leadership, General Counsel, Information Technology, and Human Resources, with feedback from departmental representatives to establish an agency-wide framework for acceptable AI use.

The proposed policy establishes:

- Standards for acceptable and prohibited AI use;
- Employee training and authorization requirements;
- IT review and approval procedures for AI platforms;
- Data privacy and cybersecurity safeguards; and
- Oversight, monitoring, and enforcement provisions.

The policy also clarifies that AI tools may assist employees in performing work duties, but may not replace professional judgment, supervisory oversight, or employee accountability.

It is recommended that the Board of Commissioners approve the proposed Artificial Intelligence Acceptable Use Policy and authorize the Executive Director to implement the policy and make administrative updates as necessary to maintain compliance with evolving technology, cybersecurity standards, and applicable legal requirements.

Authorizing and Approving the St. Louis Housing Authority's Artificial Intelligence Policy Framework

WHEREAS, the St. Louis Housing Authority (SLHA) recognizes the increasing use and availability of Artificial Intelligence (AI) technologies within modern workplace operations; and

WHEREAS, AI technologies may provide operational efficiencies, productivity enhancements, research support, and administrative assistance when used responsibly and securely; and

WHEREAS, SLHA further recognizes that the use of AI technologies presents potential risks involving cybersecurity, confidentiality, misinformation, and regulatory compliance; and

WHEREAS, SLHA has developed a proposed Artificial Intelligence Acceptable Use Policy to establish standards governing the ethical, lawful, secure, and responsible use of AI tools throughout the Agency; and

WHEREAS, the proposed AI policy establishes requirements regarding employee training, authorized access, cybersecurity protections, acceptable use standards, prohibited activities, oversight responsibilities, and enforcement procedures; and

WHEREAS, adoption of the proposed AI policy is in the best interests of SLHA and supports sound governance, operational integrity, and protection of participant and Agency information.

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

1. The St. Louis Housing Authority's Artificial Intelligence Acceptable Use Policy is hereby approved and adopted.
2. The Executive Director is authorized and directed to take all necessary actions to implement the Plan.

ARTIFICIAL INTELLIGENCE (A.I.) ACCEPTABLE USE POLICY

1. Purpose

This policy outlines the acceptable use of artificial intelligence (A.I.) technologies within the St. Louis Housing Authority (SLHA). It aims to ensure ethical, responsible, and lawful use of A.I. tools. This policy is intended to balance the potential uses of A.I. against SLHA's interests in protecting the private and personal data of our applications, residents, voucher participants, and employees, as well as the preservation of jobs, and the safeguarding of our natural environment (as A.I. poses considerable demands on electric infrastructure and freshwater usage). This policy provides employees with guidelines for appropriate, responsible use of A.I. tools while protecting the business and mitigating the risk of misuse, unethical outcomes, potential biases, inaccuracy, and information security breaches. This policy is not intended to restrict communications or actions protected or required by state or federal law. Nothing in this policy shall prevent employees from saying or doing things that the law says they are allowed to do or must do.

2. Scope

This policy applies to: All components of SLHA, including all subsidiaries and affiliated non-profits, clients, employees, advisors, agents of SLHA, and all authorized third parties that require use of and are granted access to SLHA computer and information resources.

3. Definitions

"Artificial Intelligence," or "A.I." as used in this policy, is a machine-based system that can, for a given set of human objectives, make predictions, recommendations, or decisions.

"Generative Artificial Intelligence" ("Generative A.I.") is a type of artificial intelligence technology that can generate many forms of content including but not limited to texts, images, and multimedia.

"A.I. Tools" means any data system, software, hardware, application, tool, or utility that operates in whole or in part using A.I., including Generative A.I.

4. Principles

- **Compliance with Related Policies and Agreements:** Any use of A.I. Tools under this Policy must comply with the relevant policies, internal controls, and guidelines of SLHA, including, but not limited to:
 - IT Handbook and Acceptable Use Policy
 - Conflict of Interest Law
 - Privacy Act Notice
 - Anti-Harassment/Anti-Discrimination Policy
 - Written Information and Security Plan

- **Accountability:** Users of A.I. tools are responsible for ensuring compliance with this policy and are accountable for the performance, accuracy, and impact of any A.I.-assisted work. All content created or informed by A.I. must be reviewed and validated by the user for accuracy and reliability. A.I. tools may be used to enhance productivity, decision-making, and innovation; however, they must not replace the user's professional judgment, oversight, or accountability. A.I. may assist by generating information or suggestions, but users must interpret results within context and remain responsible for all outcomes.
- **Transparency:** Use of A.I. Tools should be transparent, with clear documentation on their purpose, capabilities, and limitations. Transparent is defined as open and clear in communication about when, how, and why A.I. tools are being used, as per SLHA's A.I. policy. Compliance with this policy accomplishes this principle of transparency. A copy of this policy will be posted on SLHA website to serve as SLHA's method of transparency.
- **Fairness:** A.I. Tools should be used fairly and should not discriminate against anyone. Because A.I. systems can sometimes reflect bias from the data or the way they are built, users should be aware of these risks and take steps to reduce unfair or unequal outcomes, as described in the Acceptable Use Guidelines below.

5. Request and Approval Process

- Only trained, authorized employees may use approved A.I. tools. Employees wishing to use A.I. tools must submit a written request to their Department Head specifying:
 - The type of A.I. tool requested; and
 - What the employee intends to use the A.I. tool for, including how it supports a specific business need or helps resolve an identified challenge or problem.
- IT must review each request to ensure the proposed tool:
 - Can be securely managed and protected from unauthorized access or misuse.
 - Requires a login or other secure method of access.
 - Meets IT security standards, including that the subscription level allows for opt-out of model training and that it is a private instance of the A.I., not a public A.I.
- Department Heads must approve or deny requests in writing. Approvals may be revoked at any time. Requests denied by IT may be elevated by the Department Head for further review and approval by the Executive Director. Requests denied by the Department Head are not subject to further review.

6. Acceptable Use Guidelines

- Upon approval, employees may only use a work account (not a personal account) with a subscription-based license that is assigned by SLHA's IT department.
- Use of A.I. Tools must comply with data protection laws and respect user privacy, including but not limited to:
 - The Privacy Act of 1974
 - Ch.610 RSMo.
 - SLHA's policies
 - HUD Privacy Handbook 1325.1 Rev. 1.0
 - HUD Handbook 2400.25 Rev 4 (HUD IT Security Policy)
- Employees are expected to verify results generated by an A.I. tool before acting on them, and report any potential legal, ethical, or policy concerns to a supervisor.
- Programming/Coding: A.I. tools are permitted to aid in programming and coding, providing a human code review is performed before deployment. Checks to ensure security, reliability, and integrity of the code need to be performed by a qualified human before A.I.- generated code is deployed or used in or with SLHA systems.

7. Prohibited Use of A.I. Tools

The following uses are prohibited:

- Entering any company, employee, resident, participant, applicant, or third-party confidential, trade secret, or other personal or proprietary information into a prompt for any A.I. tool, regardless of any incognito or privacy function that the A.I. tool promotes.
 - Examples may include but are not limited to
 - Name
 - Date of Birth
 - Social Security Number
 - Phone Number
 - Address - including building and unit numbers
 - Driver License Number
 - Any unique identifiers tied to a resident/participant/applicant's file or household
 - Health or disability-related information
 - Financial information
- Using A.I. tools to make decisions about resident/participant/applicant eligibility, compliance, or enforcement.
- Copying and pasting A.I.-generated reports or correspondence without verifying facts or causing misinformation or errors in official communications.

- Using A.I. to fabricate progress reports, meeting notes, or time-tracking data to mislead supervisors about completed work.
- Using A.I. tools to automate work tasks, such as communication with residents. Automation is defined as: A task or action which occurs without any human intervention, participation, oversight, or review.
- Engaging in unlawful activities or violating human or civil rights.
- Deploying A.I. tools that result in biased or discriminatory outcomes.
- Deploying unapproved chatbots, scripts, or automation that send unnecessary messages, alter shared documents, or flood communication channels.
- Collecting data without consent.
- Connecting a third-party A.I. tool to internal systems without IT approval or otherwise create security or data privacy risks that impact team operations.

The following scenarios are offered as some examples of acceptable and prohibited uses of A.I. tools at SLHA:

Proposed Use	Acceptable? (Yes/No)	Notes
Using generative A.I. to draft a newsletter introduction	Yes	So long as no sensitive information, for example, PII, is included
Having A.I. summarize a resident complaint	No	This involves confidential details, such as resident names
Asking A.I. to suggest general policy language	Yes	For internal brainstorming and initial drafting only
Using A.I. to analyze resident incomes	No	Prohibited (secure platform verification required)
Using A.I. to help craft Excel formulas or programming code	Yes	So long as no sensitive information, for example, PII, is included
Using A.I. to craft a response (email, letter, etc.) to a resident issue	No	Under no situation can generative A.I. be used in direct communication to residents. Use approved templates instead
Using A.I. to brainstorm ideas for generalized or non-specific content	Yes	So long as the content has no protected internal or external information (PII, building info, unit info, etc.)
Using A.I. to complete a notice terminating tenancy or assistance to a resident	No	This involves confidential details regarding resident

8. Implementation and Monitoring

- Regular audits and assessments of SLHA's approved A.I. tools and their use to ensure compliance with this policy.
- Access to approved A.I. tools must be administered by SLHA IT department. Access will only be granted to approved SLHA A.I. tools, as listed in **Appendix A** of this document. Access will only be granted after users have received approval from their department manager and completed A.I. Use Training.
- Training programs for users to understand ethical A.I. use and potential risks.
 - SLHA recognizes that an informed workforce is the safest and most capable workforce. Therefore, training resources will be provided to help employees understand their obligations under this Policy and avoid creating undue risks.
 - Employees must complete A.I. Use Training within 3 months of initial hire. All employees must complete the training on an annual basis. Directors and Managers must ensure their staff complete the required training.
 - SLHA may deem failure to participate in required A.I. Use Training as a violation of this Policy. SLHA will retain attendance records and copies of A.I. training materials provided to employees.
- Department Heads will monitor for the following potential indicators of A.I. misuse:
 - Sudden, repeated use of external A.I. tools from non-approved accounts
 - Unexplained changes in output quality or sudden mistakes in work products
 - Large or unusual file uploads to third-party sites
 - An employee repeatedly asking for access to privileged data with unclear justification
 - Spike in communications with unusual tone/language

9. Reporting and Enforcement

- Employees must report any misuse or unethical use of A.I. technologies to their supervisor and the IT department.
- Violations of this policy may result in disciplinary action, up to and including termination.

10. Review and Updates

This policy will be reviewed annually and updated as necessary to reflect changes in technology and regulations.

Appendix A
SLHA Approved A.I. Platforms

Company	Platform	Edition	Requires Separate License	Requires Training	Assigned By
Microsoft	Copilot	Bundled	No	Yes	SLHA IT Department
Microsoft	Copilot	M365	Yes \$30.60/user/mo	Yes	SLHA IT Department
Open AI	ChatGPT	Plus	Yes \$20/user/mo	Yes	SLHA IT Department
Anthropic	Claude	Pro	Yes \$17/user/mo	Yes	SLHA IT Department

Departments have multiple approved AI tools to choose from. Regardless of the tool selected, users must be signed in with their Agency account (where applicable) to remain in compliance with this policy. Free, public versions of these tools should NOT be used for Agency work, as they may not provide the same data protections. IT has worked to automate sign-in where possible, but users are responsible for ensuring they are properly authenticated when using these tools.

Microsoft Copilot Options

Option 1: Bundled

This version comes with the Agency’s Microsoft GCC3 license. It performs general chat, search, and analysis functions with basic image generation capabilities and is grounded in web-trained data. For most users, this will meet their needs.

Option 2: M365

This version is an add-on to the Agency’s Microsoft GCC3 license. It performs the same functions as the bundled version but uses more advanced models. It also integrates across Microsoft products (Word, Excel, PowerPoint, etc.) and can securely access and analyze Agency data.

Other Approved AI Tools

ChatGPT (Enterprise / Team / Approved Workspace Version)

ChatGPT provides advanced conversational AI, content generation, coding assistance, and data analysis capabilities. Approved versions offer enhanced privacy and security protections compared to the public version. Users must ensure they are logged into an approved SLHA device when using ChatGPT for Agency work.

Claude (Enterprise / Team Version)

Claude offers similar capabilities, including document analysis, writing assistance, and conversational support. Approved versions are designed with stronger data handling protections. As with other tools, users must confirm they are signed into an authorized account and approved SLHA device before use.

RESOLUTION No. 3066

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Executive Director

Date: May 13, 2026

Subject: Resolution No. 3066
Authorizing and Approving the St. Louis Housing Authority's Minor Safety and Protection Policy for Service Providers and Partners

By this memorandum, the St. Louis Housing Authority (SLHA) respectfully requests board approval of the proposed Minor Safety and Protection Policy for Service Providers and Partners.

SLHA partners with numerous service providers, contractors, community organizations, and program operators that provide services and programming to youth and families on SLHA properties and in connection with SLHA-sponsored activities. The proposed Minor Safety and Protection Policy establishes minimum safeguarding standards intended to help protect minors participating in these activities.

The policy requires criminal background screening and compliance protocols for covered employees, volunteers, agents, subcontractors, and other individuals who may have regular or unsupervised contact with minors while providing services on behalf of SLHA.

The proposed policy establishes:

- Background screening requirements for covered individuals;
- Disqualifying criminal offenses and screening standards;
- Service provider certification and reporting obligations;
- Insurance and safeguarding expectations;
- Incident reporting requirements;
- SLHA oversight and enforcement authority; and
- Administrative procedures for ongoing monitoring and compliance.

The policy also includes a compliance certification form to be completed by applicable service providers and partners operating on SLHA property or in connection with SLHA programming.

It is recommended that the Board of Commissioners approve the proposed Minor Safety and Protection Policy and authorize the Executive Director to implement administrative procedures necessary to support compliance and youth safeguarding efforts across the Agency.

Authorizing and Approving the St. Louis Housing Authority's Minor Safety and Protection Policy for Service Providers and Partners

WHEREAS, the St. Louis Housing Authority ("SLHA") is committed to maintaining safe environments for youth and families participating in programs, services, and activities conducted on SLHA properties or in partnership with SLHA; and

WHEREAS, SLHA recognizes the importance of implementing safeguarding standards for service providers, contractors, volunteers, and other individuals who may have direct or unsupervised contact with minors; and

WHEREAS, SLHA staff have developed a Minor Safety and Protection Policy establishing background screening requirements, compliance certifications, reporting obligations, and oversight procedures intended to promote youth safety and organizational accountability; and

WHEREAS, the proposed Minor Safety and Protection Policy supports SLHA's commitment to responsible operations, resident safety, and risk management practices.

WHEREAS, adoption of the proposed Minor Safety and Protection Policy is in the best interests of SLHA.

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

1. The St. Louis Housing Authority's Minor Safety and Protection Policy for Service Providers and Partners is hereby approved and adopted.
2. The Executive Director is authorized and directed to take all necessary actions to implement the Plan.

ST. LOUIS HOUSING AUTHORITY
Minor Safety and Protection Policy for Service Providers and Partners

I. PURPOSE

To ensure the safety and well-being of minors participating in programs, services, or activities conducted on or in connection with St. Louis Housing Authority (SLHA) properties, SLHA establishes this Youth Protection Policy.

This Policy requires, to the fullest extent permitted by law, criminal background screening and safeguarding protocols for all employees, volunteers, agents, and subcontractors of service providers who may have regular, ongoing direct or unsupervised contact with minors on SLHA property.

II. DEFINITIONS

Background Check

A criminal history screening conducted through reliable federal, state, and local databases identified by SLHA as being reliable sources of information for purposes of this Policy, including, but not limited to, sex offender registries, child abuse registries and law enforcement registries.

Covered Persons

Adult employees, volunteers, agents, or subcontractors of a service provider who may have more than incidental contact with or supervision of minors.

Minor

Any individual under the age of 18 who is not legally emancipated.

Service Provider

Any organization, contractor, partner agency, or vendor providing services, programming, or activities on SLHA property or on behalf of SLHA.

Disqualifying Offenses

Criminal offenses that prohibit an individual from serving as a Covered Person under this Policy (see Section V).

III. APPLICABILITY

This Policy applies to all Service Providers operating:

- On SLHA-owned or managed properties
- In partnership with SLHA programs
- On behalf of SLHA residents, particularly youth-focused programming

Service Providers are responsible for identifying Covered Persons based on:

- Frequency and duration of contact with minors
- Level of supervision
- Nature of interaction (mentorship, instruction, case management, etc.)
- Setting (private vs. group environments)

Minors serving as volunteers must be supervised at all times by a cleared Covered Person.

SLHA reserves the right to designate additional individuals as Covered Persons and require screening accordingly.

IV. SERVICE PROVIDER RESPONSIBILITIES

As a condition of contracting or partnership with SLHA, Service Providers must:

1. Background Screening

- Conduct background checks on all Covered Persons prior to engagement
- Prohibit any interaction with minors until clearance is confirmed

2. Certification & Documentation

- Maintain a current roster of cleared Covered Persons
- Provide certification of compliance to SLHA upon request

3. Ongoing Monitoring

- Implement procedures for periodic re-screening or continuous monitoring where feasible
- Immediately remove individuals from youth contact if concerns arise

4. Incident Reporting

Service Providers must notify SLHA immediately in writing if a Covered Person:

- Is arrested for a potentially disqualifying offense
- Is under investigation for misconduct involving minors
- Violates any provision of this Policy

5. Affidavit Requirement

Covered Persons must attest that:

- They have not falsified background information
- They are not listed on any sex offender registry
- They have disclosed any relevant criminal history

V. CRIMINAL BACKGROUND CLEARANCE

A Covered Person shall be disqualified if they have been convicted of, pled guilty to, or are required to register for:

A. Automatic Disqualifiers

- Any sex offense involving a minor
- Registration on any sex offender registry (including Missouri Sex Offender Registry)
- Child abuse or neglect
- Domestic violence involving injury or threat to a minor
- Human trafficking or exploitation

B. Violent or High-Risk Offenses

- Homicide or attempted homicide
- Felony assault
- Kidnapping or false imprisonment
- Armed robbery

C. Other Relevant Offenses

- Endangerment of a child
- Crimes involving weapons in proximity to minors
- Pattern of violent or predatory behavior

D. Consideration of Mitigating Factors

Except for registered sex offenders, SLHA may allow case-by-case exceptions based on:

- Time elapsed since the offense
- Evidence of rehabilitation
- Relevance of the offense to the role
- Employment and conduct history
- Risk to minors

SLHA shall retain final discretion in all determinations.

VI. SLHA AUTHORITY & OVERSIGHT

SLHA reserves the right to:

- Require additional screening (e.g., drug testing, fingerprinting)
- Deny or remove any Covered Person at its sole discretion
- Require proof of insurance, including:
 - General Liability
 - Abuse & Molestation coverage
- Waive requirements in emergency situations where immediate services are necessary to protect health and safety or otherwise in the best interest of the agency as determined by the Executive Director.

VII. TRAINING & SAFEGUARDING EXPECTATIONS (ENHANCEMENT)

Service Providers are strongly encouraged to:

- Provide youth safety training (e.g., mandated reporting, boundaries, trauma-informed care)
- Implement two-adult rule or visibility standards consistent with youth supervision best practices for safe and supportive programming
- Establish clear reporting pathways for youth concerns
- Maintain clear and consistent incident documentation protocols

VIII. POLICY AMENDMENTS & PROCEDURES

This Policy may be amended by the Executive Director or the SLHA Board of Commissioners.

The Executive Director of SLHA (or designee) may establish administrative procedures to be adopted in furtherance of this Policy. Such procedures may be updated as needed to ensure continued compliance with evolving federal, state, and local requirements.

**Compliance Certification
Minor Safety and Protection Policy**

I. SERVICE PROVIDER INFORMATION

Organization Name: _____
Program/Activity Name: _____
Primary Point of Contact: _____ **Title:** _____
Email: _____ **Phone:** _____

II. ATTESTATION OF SCREENING & SAFEGUARDING

As an authorized representative of the above-named Organization (hereafter "Service Provider"), I hereby certify that the Service Provider is in full compliance with SLHA's Minor Safety and Protection Policy, including:

1. **Background Screening:** All "Covered Persons" (employees, volunteers, or subcontractors) with regular, ongoing, or unsupervised contact with minors have successfully cleared a criminal background check prior to engagement.
2. **Scope of Search:** Background checks included, at minimum:
 - National and State (Missouri) Sex Offender Registries.
 - Child Abuse and Neglect Registries.
 - Reliable federal and local criminal history databases.
3. **Automatic Disqualifiers:** No Covered Person currently providing services on SLHA property has been convicted of, or pled guilty to, any sex offense involving a minor, child abuse/neglect, or any "Automatic Disqualifier" listed in SLHA's Minor Safety and Protection Policy.
4. **Roster Maintenance:** Service Provider maintains an internal roster of all cleared Covered Persons and will provide this list to SLHA upon request within five (5) business days.
5. **Ongoing Monitoring:** Service Provider has established procedures for continuous monitoring and will notify SLHA in writing within 24 hours if any Covered Person is arrested for a potentially disqualifying offense or investigated for misconduct involving minors.

III. INSURANCE REQUIREMENTS

I certify that Service Provider maintains the following insurance coverages as required by SLHA (check all that apply):

- ✓ General Liability
- ✓ Abuse & Molestation Coverage

IV. SIGNATURE

I understand that any falsification of this certification or failure to adhere to SLHA's Minor Safety and Protection Policy may result in the immediate termination of contracts or partnership agreements.

Authorized Signature: _____ **Date:** _____

Printed Name: _____ **Title:** _____

RESOLUTION No. 3067

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Executive Director

Date: May 13, 2026

Subject: Resolution No. 3067
Authorizing and Approving Revisions to the Sunshine Law Compliance Policy

By this memorandum, the St. Louis Housing Authority (SLHA) respectfully requests board approval of the proposed revisions of the Sunshine Law Policy for the agency.

SLHA's current Sunshine Law Policy was last adopted in 2016. Since that time, the Missouri General Assembly has enacted several amendments to Chapter 610 RSMo., commonly known as the Missouri Sunshine Law. The proposed revisions are intended to update SLHA's policy to reflect current statutory requirements, improve administrative clarity, and modernize records request procedures.

The updated policy incorporates statutory changes related to public records request processing, electronic and remote meeting practices, expanded categories of closed records, request clarification procedures, records request withdrawals for nonpayment or nonresponse, and updated fee and cost recovery provisions.

Additionally, the revised policy modernizes operational practices by formally recognizing electronic submission methods for Sunshine requests through SLHA's website portal and clarifying the responsibilities of the Custodian of Records.

The revised policy includes updates related to:

- Expanded statutory exemptions for certain closed meetings and records;
- Procedures for electronic submission of Sunshine Law requests;
- Clarification and withdrawal procedures for incomplete requests;
- Updated fee, deposit, and cost recovery provisions authorized by Missouri law;
- Remote meeting participation procedures;
- Administrative documentation and response requirements; and
- Additional public safety, cybersecurity, and security-related confidentiality provisions.

These revisions are intended to strengthen SLHA's compliance with Missouri law, while maintaining transparency, accountability, and efficient public access to records.

It is recommended that the Board of Commissioners approve the revised Sunshine Law Policy and authorize the Executive Director to implement and administer the updated policy in accordance with applicable Missouri law.

Authorizing and Approving Revisions to the Sunshine Compliance Policy

WHEREAS, the St. Louis Housing Authority (SLHA) is committed to conducting its business in compliance with Chapter 610 RSMo., commonly known as the Missouri Sunshine Law; and

WHEREAS, subsequent amendments to Missouri Sunshine Law provisions necessitate revisions to SLHA's policy to ensure continued legal compliance and operational consistency with current law; and

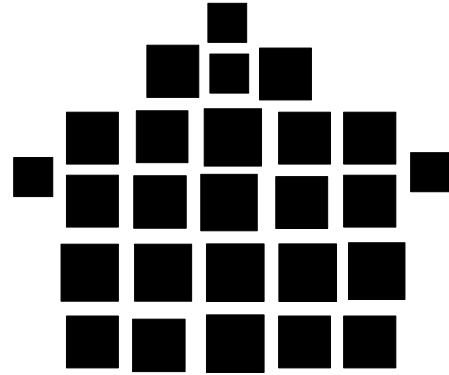
WHEREAS, the revised Sunshine Law Policy updates provisions relating to public records requests, response timelines, electronic submissions, closed records, fee procedures, cybersecurity and public safety protections, and remote meeting practices; and

WHEREAS, adoption of the revised policy supports SLHA's commitment to transparency, accountability, sound governance, and compliance with applicable Missouri law; and

WHEREAS, adoption of the revised policy is in the best interests of SLHA.

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

1. The revised St. Louis Housing Authority's Sunshine Law Policy is hereby approved and adopted.
2. The Executive Director is authorized and directed to take all necessary actions to implement the Policy.



St. Louis Housing Authority

SUNSHINE LAW POLICY

| **April 28, 2016**

St. Louis Housing Authority
SUNSHINE LAW POLICY

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I. Introduction

The St. Louis Housing Authority (hereafter "Authority") desires to conduct its business in compliance with the Missouri Open Meetings and Records Act, Chapter 610 of the Revised Statutes of Missouri, more commonly known as the Missouri Sunshine Law. This policy is designed to explain to the Authority's clients and to the public at large the ways that it implements its responsibilities under the Sunshine Law.

II. Meetings, Records and Votes, When Closed

All meetings, records and votes are open to the public, except that the Authority may close any meeting, record or vote pursuant to the provisions of the Missouri Sunshine Law, or by any other statute of Missouri, or by any statute or regulation of the United States government. All meetings, records or votes of the Authority which are permitted to be closed by reason of the Sunshine Law, or by any other statute of Missouri, or by any statute or regulation of the United States government are deemed to be closed meetings, records or votes.

Except to the extent disclosure is otherwise required by law, the Authority is authorized to close meetings, records and votes to the extent they relate to the following:

- (1) Legal actions, causes of action or litigation involving ~~a public governmental body~~the Authority and any confidential or privileged communications between ~~a public governmental body~~the Authority or its representatives and its attorneys. However, any minutes, vote or settlement agreement relating to legal actions, causes of action or litigation involving ~~a public governmental body~~the Authority or any agent or entity representing its interests or acting on its behalf or with its authority, including any insurance company acting on behalf of ~~a public government body~~the Authority as its insured, shall be made public upon final disposition of the matter voted upon or upon the signing by the parties of the settlement agreement, unless, prior to final disposition, the settlement agreement is ordered closed by a court after a written finding that the adverse impact to a plaintiff or plaintiffs to the action clearly outweighs the public policy considerations of section 610.011 RSMo., however, the amount of any moneys paid by, or on behalf of, the ~~public governmental body~~Authority shall be disclosed; provided, however, in matters involving the exercise of the power of eminent domain, the vote shall be announced or become public immediately following the action on the motion to authorize institution of such a legal action. Legal work product shall be considered a closed record;
- (2) Leasing, purchase or sale of real estate by ~~a public governmental body~~the Authority where public knowledge of the transaction might adversely affect the legal consideration therefor. However, any minutes, vote or public record approving a contract relating to the leasing, purchase or sale of real estate by ~~a public~~

- ~~governmental body~~ the Authority shall be made public upon execution of the lease, purchase or sale of the real estate;
- (3) Hiring, firing, disciplining or promoting of particular employees by ~~a public governmental body~~ the Authority when personal information about the employee is discussed or recorded. The term "personal information" here means information relating to the performance or merit of individual employees;
- ~~(4) The state militia or national guard or any part thereof;~~
- ~~(5)~~ Nonjudicial mental or physical health proceedings involving identifiable persons, including medical, psychiatric, psychological, or alcoholism or drug dependency diagnosis or treatment;
- ~~(6) Scholastic probation, expulsion, or graduation of identifiable individuals, including records of individual test or examination scores; however, personally identifiable student records maintained by public educational institutions shall be open for inspection by the parents, guardian or other custodian of students under the age of eighteen years and by the parents, guardian or other custodian and the student if the student is over the age of eighteen years;~~
- ~~(7) Testing and examination materials, before the test or examination is given or, if it is to be given again, before so given again;~~
- ~~(8)~~ Welfare cases of identifiable individuals;
- ~~(9)~~ Preparation, including any discussions or work product, on behalf of ~~a public governmental body~~ the Authority or its representatives for negotiations with employee groups;
- ~~(10)~~ Software codes for electronic data processing and documentation thereof;
- ~~(11)~~ Specifications for competitive bidding, until either the specifications are officially approved by the ~~public governmental body~~ Authority or the specifications are published for bid;
- ~~(12)~~ Sealed bids and related documents, until the bids are opened; and sealed proposals and related documents or any documents related to a negotiated contract until a contract is executed, or all proposals are rejected;
- ~~(13)~~ Individually identifiable personnel records, performance ratings or records pertaining to employees or applicants for employment, except that this exemption shall not apply to the names, positions, salaries and lengths of service of officers and employees of the Authority once they are employed as such;
- ~~(14)~~ Records which are protected from disclosure by law;

~~(15) Meetings and public records relating to scientific and technological innovations in — which the owner has a proprietary interest;~~ (126) Records relating to municipal hotlines established for the reporting of abuse and wrongdoing;

(13) Records relating to reports of allegations of improper government activities under section 29.221 RSMo.;

(147) Confidential or privileged communications between ~~a public governmental body~~ the Authority and its auditor, including all auditor work product; however, all final audit reports issued by the auditor are to be considered open records ~~pursuant to this chapter;~~

(15) Security measures, global positioning system (GPS) data, investigative information, or investigative or surveillance techniques of any public agency responsible for law enforcement or public safety that, if disclosed, has the potential to endanger the health or safety of an individual or the public;

(16) Any information contained in any suspicious activity report provided to law enforcement that, if disclosed, has the potential to endanger the health or safety of an individual or the public;

(187) Operational guidelines, policies and specific response plans developed, adopted, or maintained by any public agency responsible for law enforcement, public safety, first response, or public health for use in responding to or preventing any critical incident which ~~is or appears to be terrorist in nature and which~~ has the potential to endanger individual or public safety or health. Financial records related to the procurement of or expenditures relating to operational guidelines, policies or plans purchased with public funds shall be open. When seeking to close information pursuant to this exception, the ~~public governmental body~~ Authority shall affirmatively state in writing that disclosure would impair the ~~public governmental body~~ Authority's ability to protect the security or safety of persons or real property, and shall in the same writing state that the public interest in nondisclosure outweighs the public interest in disclosure of the records;

(198) Existing or proposed security systems and structural plans of real property owned or leased by ~~a public governmental body~~ the Authority, and information that is voluntarily submitted by a nonpublic entity owning or operating an infrastructure to ~~any public governmental body~~ the Authority for use by ~~that body~~ the Authority to devise plans for protection of that infrastructure, the public disclosure of which would threaten public safety:

(a) Records related to the procurement of or expenditures relating to security systems purchased with public funds shall be open;

- (b) When seeking to close information pursuant to this exception, the ~~public governmental body~~Authority shall affirmatively state in writing that disclosure would impair the ~~public governmental body's~~Authority's ability to protect the security or safety of persons or real property, and shall in the same writing state that the public interest in nondisclosure outweighs the public interest in disclosure of the records;
- (c) Records that are voluntarily submitted by a nonpublic entity shall be reviewed by the receiving agency within ninety days of submission to determine if retention of the document is necessary in furtherance of a state security interest. If retention is not necessary, the documents shall be returned to the nonpublic governmental body or destroyed;
- ~~(2019)~~ The portion of a record that identifies security systems or access codes or authorization codes for security systems of real property;
- ~~(204)~~ Records that identify the configuration of components or the operation of a computer, computer system, computer network, or telecommunications network, and would allow unauthorized access to or unlawful disruption of a computer, computer system, computer network, or telecommunications network of ~~a public governmental body~~the Authority. This exception shall not be used to limit or deny access to otherwise public records in a file, document, data file or database containing public records. Records related to the procurement of or expenditures relating to such computer, computer system, computer network, or telecommunications network, including the amount of moneys paid by, or on behalf of, ~~a public governmental body~~the Authority for such computer, computer system, computer network, or telecommunications network shall be open;
- ~~(221)~~ Credit card numbers, personal identification numbers, digital certificates, physical and virtual keys, access codes or authorization codes that are used to protect the security of electronic transactions between ~~a public governmental body~~the Authority and a person or entity doing business with ~~a public governmental body~~the Authority. Nothing in this section shall be deemed to close the record of a person or entity using a credit card held in the name of ~~a public governmental body~~the Authority or any record of a transaction made by a person using a credit card or other method of payment for which reimbursement is made by ~~a public governmental body~~the Authority; and
- ~~(23)~~ ~~Records submitted by an individual, corporation, or other business entity to a public institution of higher education in connection with a proposal to license intellectual property or perform sponsored research and which contains sales projections or other business plan information the disclosure of which may endanger the competitiveness of a business.~~
- (22) Records relating to foster home or kinship placements of children in foster care; and

(23) Any other exceptions permitted under section 610.021 RSMo. or other provision of Missouri law.

III. Custodian of Records Designated

The General Counsel is the Custodian of Records for the Authority. The Custodian of Records is located at 3520 Page Boulevard, St. Louis, MO 63106. Requests for records made to persons other than the Custodian of Records may not be considered to be requests that are made pursuant to the Missouri Sunshine Law, Chapter 610 RSMo.

IV. How Records are Requested

~~All requests for records are to be made in writing; however, it shall not be a reason to refuse the request that the person making the request declines to put the request in writing~~The Authority does not require records requests be submitted in a specific format; however, the Authority encourages requesters to make their requests in writing via the "Submit A Sunshine Request" portal on the Authority's website. The Custodian of Records may require that requests be accompanied by a deposit of the estimated cost of researching and reproducing the requested information. Oral requests, if received by the Authority, shall be immediately recorded in written form by the Custodian of Records to document the same.

V. Response Within 3 Business Days

Each request for access to a public record shall be acted upon as soon as possible, but in no event later than the end of the third business day following the date the request is received by the Custodian of Records. If records are requested in a certain format, the Authority shall provide the records in the requested format if such format is available. If access to the public record is not granted immediately, the Custodian of Records shall give a detailed explanation of the cause for further delay and the place and earliest time and date that the record will be available for inspection. If a request for access is denied, the Custodian of Records shall provide, upon request, a written statement of the grounds for such denial. Such statement shall cite the specific provision of law under which access is denied and shall be furnished to the requester no later than the end of the third business day following the date that the request for the statement is received.

When Request Deemed Withdrawn – No Response to Request for Clarification. If the Authority responds to a request for public records seeking a clarification of the request and no response to the request for clarification is received by the Authority within ninety (90) days of sending the request for clarification (or within one hundred fifty (150) days of sending the request for clarification, if fees greater than one thousand dollars (\$1000) are

also requested), then the request for public records shall be considered withdrawn, if the Authority's written response requesting clarification includes notice of the 90 day (or 150 day) deadline.

VI. Documentation of Response

The Custodian of Records shall document the response provided by retaining a copy of the request and the response to the request. In addition, the Custodian of Records shall either retain a copy of the documents provided or a brief description of them.

VII. Request for Searches

Any search request that will require more than 30 minutes of staff time may be declined without an advance deposit for the estimated time required to search for the records.

VIII. Fees for Retrieval and Copies

Fees for copying records shall not exceed ten cents per page for a paper copy not larger than nine by fourteen inches, with the hourly fee for duplicating time not to exceed the average hourly rate of pay for clerical staff of the Authority. Research time required for fulfilling records requests will be charged at the actual cost of research time. Based on the scope of the request, the Authority shall produce the copies using employees that result in the lowest amount of charges for search, research, and duplication time.

Fees for providing access to public records maintained on computer facilities, recording tapes or disks, videotapes or films, pictures, maps, slides, graphics, illustrations or similar audio or visual items or devices, and for paper copies larger than nine by fourteen inches shall include only the actual cost of copies, staff time, which shall not exceed the average hourly rate of pay for staff of the Authority required for making copies and programming, if necessary, and the cost of the disk, or other medium used for the duplication. Fees for maps, blueprints, or plats that require special expertise to duplicate may include the actual rate of compensation for the trained personnel required to duplicate such maps, blueprints, or plats.

If programming is required beyond the customary and usual level to comply with a request for records or information, the fees for compliance may include the actual costs of such programming.

Payment of ~~such copying~~ fees may be requested prior to ~~the making of copies~~ fulfilling the request.

When Request Deemed Withdrawn – Nonpayment of Fees. If the Authority requests payment prior to fulfilling, the request for public records shall be considered withdrawn if the requester fails to remit all fees within ninety (90) days of the request for payment, or

within one hundred fifty (150) days of the request for payment if the fees are greater than one thousand dollars (\$1,000), if the Authority's request for payment of fees includes notice of the 90 or 150-day deadline.

Additional Fees for Resubmission. If the same or a substantially similar request for public records is submitted to the Authority within six (6) months after the expiration of the 90 or 150-day deadline for payment or clarification and no response was received by the Authority, then the Authority may request payment of the same fees for the original request in addition to any allowable fees necessary to fulfill the subsequent request.

IX. Waiver of Fees

The Custodian of Records may elect to waive the collection of any of the fees totaling less than \$5 provided in Section Eight. No person or organization shall receive more than three (3) such waivers in any 12-month period. The limitation on the number of waivers in a 12-month period does not apply when the Authority determines that waiver of the fees is in the public interest pursuant to section 610.026.1(1) RSMo.

X. Authorized Recipients of Closed Records

No closed records shall be released to any person who is not a part of the Authority's staff, except that the Authority's auditor may see such records as are reasonably necessary to prepare an audit report as requested by the Authority. The Authority's outside counsel may see such records as are reasonably necessary to represent the Authority and, in addition, closed records are available to the U. S. Department of Housing and Urban Development.

XI. Notice of Meetings

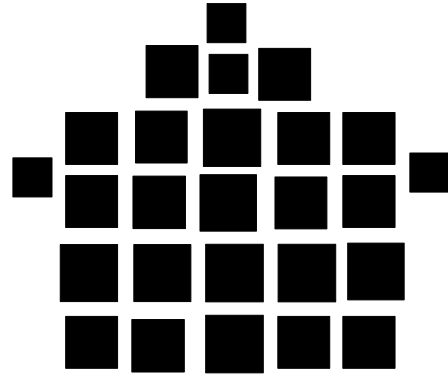
The Authority will give notice of the time, date, place and tentative agenda of each meeting of the Board of Commissioners at least 24 hours (exclusive of holidays and weekends) prior to the meeting unless an emergency makes it impossible to do so.

The Custodian of Records shall establish a fixed place where all public notices and agenda will be posted. This notice board must either be located at the Authority's central office or at the building in which the meeting is to be held.

XII. Normal Meeting Place, Time, and Date

Regular meetings of the Authority are held on the fourth Thursday of the month at 4:30 p.m. at the Authority's central office located at 3520 Page Boulevard, St. Louis, MO 63106 or a means of remote communication through which appropriate parties may participate

| and the public observe at 4:30 p.m., except when a different time and place are agreed upon by the Board of Commissioners.



St. Louis Housing Authority

SUNSHINE LAW POLICY

April 28, 2016

St. Louis Housing Authority
SUNSHINE LAW POLICY

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Except to the extent disclosure is otherwise required by law, the Authority is authorized to close meetings, records and votes to the extent they relate to the following:

- (1) Legal actions, causes of action or litigation involving a public governmental body and any confidential or privileged communications between a public governmental body or its representatives and its attorneys. However, any minutes, vote or settlement agreement relating to legal actions, causes of action or litigation involving a public governmental body or any agent or entity representing its interests or acting on its behalf or with its authority, including any insurance company acting on behalf of a public government body as its insured, shall be made public upon final disposition of the matter voted upon or upon the signing by the parties of the settlement agreement, unless, prior to final disposition, the settlement agreement is ordered closed by a court after a written finding that the adverse impact to a plaintiff or plaintiffs to the action clearly outweighs the public policy considerations of Section [610.011](#) of the revised Missouri Statutes, however, the amount of any moneys paid by, or on behalf of, the public governmental body shall be disclosed; provided, however, in matters involving the exercise of the power of eminent domain, the vote shall be announced or become public immediately following the action on the motion to authorize institution of such a legal action. Legal work product shall be considered a closed record;
- (2) Leasing, purchase or sale of real estate by a public governmental body where public knowledge of the transaction might adversely affect the legal consideration therefor. However, any minutes, vote or public record approving a contract relating to the leasing, purchase or sale of real estate by a public governmental body shall be made public upon execution of the lease, purchase or sale of the real estate;

- (3) Hiring, firing, disciplining or promoting of particular employees by a public governmental body when personal information about the employee is discussed or recorded. The term "personal information" here means information relating to the performance or merit of individual employees;
- (4) The state militia or national guard or any part thereof;
- (5) Nonjudicial mental or physical health proceedings involving identifiable persons, including medical, psychiatric, psychological, or alcoholism or drug dependency diagnosis or treatment;
- (6) Scholastic probation, expulsion, or graduation of identifiable individuals, including records of individual test or examination scores; however, personally identifiable student records maintained by public educational institutions shall be open for inspection by the parents, guardian or other custodian of students under the age of eighteen years and by the parents, guardian or other custodian and the student if the student is over the age of eighteen years;
- (7) Testing and examination materials, before the test or examination is given or, if it is to be given again, before so given again;
- (8) Welfare cases of identifiable individuals;
- (9) Preparation, including any discussions or work product, on behalf of a public governmental body or its representatives for negotiations with employee groups;
- (10) Software codes for electronic data processing and documentation thereof;
- (11) Specifications for competitive bidding, until either the specifications are officially approved by the public governmental body or the specifications are published for bid;
- (12) Sealed bids and related documents, until the bids are opened; and sealed proposals and related documents or any documents related to a negotiated contract until a contract is executed, or all proposals are rejected;
- (13) Individually identifiable personnel records, performance ratings or records pertaining to employees or applicants for employment, except that this exemption shall not apply to the names, positions, salaries and lengths of service of officers and employees of the Authority once they are employed as such;
- (14) Records which are protected from disclosure by law;
- (15) Meetings and public records relating to scientific and technological innovations in which the owner has a proprietary interest;

- (16) Records relating to municipal hotlines established for the reporting of abuse and wrongdoing;
- (17) Confidential or privileged communications between a public governmental body and its auditor, including all auditor work product; however, all final audit reports issued by the auditor are to be considered open records pursuant to this chapter;
- (18) Operational guidelines, policies and specific response plans developed, adopted, or maintained by any public agency responsible for law enforcement, public safety, first response, or public health for use in responding to or preventing any critical incident which is or appears to be terrorist in nature and which has the potential to endanger individual or public safety or health. Financial records related to the procurement of or expenditures relating to operational guidelines, policies or plans purchased with public funds shall be open. When seeking to close information pursuant to this exception, the public governmental body shall affirmatively state in writing that disclosure would impair the public governmental body's ability to protect the security or safety of persons or real property, and shall in the same writing state that the public interest in nondisclosure outweighs the public interest in disclosure of the records;
- (19) Existing or proposed security systems and structural plans of real property owned or leased by a public governmental body, and information that is voluntarily submitted by a nonpublic entity owning or operating an infrastructure to any public governmental body for use by that body to devise plans for protection of that infrastructure, the public disclosure of which would threaten public safety:
 - (a) Records related to the procurement of or expenditures relating to security systems purchased with public funds shall be open;
 - (b) When seeking to close information pursuant to this exception, the public governmental body shall affirmatively state in writing that disclosure would impair the public governmental body's ability to protect the security or safety of persons or real property, and shall in the same writing state that the public interest in nondisclosure outweighs the public interest in disclosure of the records;
 - (c) Records that are voluntarily submitted by a nonpublic entity shall be reviewed by the receiving agency within ninety days of submission to determine if retention of the document is necessary in furtherance of a state security interest. If retention is not necessary, the documents shall be returned to the nonpublic governmental body or destroyed;
- (20) The portion of a record that identifies security systems or access codes or authorization codes for security systems of real property;

- (21) Records that identify the configuration of components or the operation of a computer, computer system, computer network, or telecommunications network, and would allow unauthorized access to or unlawful disruption of a computer, computer system, computer network, or telecommunications network of a public governmental body. This exception shall not be used to limit or deny access to otherwise public records in a file, document, data file or database containing public records. Records related to the procurement of or expenditures relating to such computer, computer system, computer network, or telecommunications network, including the amount of moneys paid by, or on behalf of, a public governmental body for such computer, computer system, computer network, or telecommunications network shall be open;
- (22) Credit card numbers, personal identification numbers, digital certificates, physical and virtual keys, access codes or authorization codes that are used to protect the security of electronic transactions between a public governmental body and a person or entity doing business with a public governmental body. Nothing in this section shall be deemed to close the record of a person or entity using a credit card held in the name of a public governmental body or any record of a transaction made by a person using a credit card or other method of payment for which reimbursement is made by a public governmental body; and
- (23) Records submitted by an individual, corporation, or other business entity to a public institution of higher education in connection with a proposal to license intellectual property or perform sponsored research and which contains sales projections or other business plan information the disclosure of which may endanger the competitiveness of a business.

III. Custodian of Records Designated

The General Counsel is the Custodian of Records for the Authority. The Custodian of Records is located at 3520 Page Boulevard, St. Louis, MO 63106. Requests for records made to persons other than the Custodian of Records may not be considered to be requests that are made pursuant to the Missouri Sunshine Law, Chapter 610 RSMo.

IV. How Records are Requested

All requests for records are to be made in writing; however, it shall not be a reason to refuse the request that the person making the request declines to put the request in writing. The Custodian of Records may require that requests be accompanied by a deposit of the estimated cost of researching and reproducing the requested information. Oral requests, if received by the Authority, shall be immediately recorded in written form by the Custodian of Records to document the same.

V. Response Within 3 Business Days

Each request for access to a public record shall be acted upon as soon as possible, but in no event later than the end of the third business day following the date the request is received by the Custodian of Records. If records are requested in a certain format, the Authority shall provide the records in the requested format if such format is available. If access to the public record is not granted immediately, the Custodian of Records shall give a detailed explanation of the cause for further delay and the place and earliest time and date that the record will be available for inspection. If a request for access is denied, the Custodian of Records shall provide, upon request, a written statement of the grounds for such denial. Such statement shall cite the specific provision of law under which access is denied and shall be furnished to the requester no later than the end of the third business day following the date that the request for the statement is received.

VI. Documentation of Response

The Custodian of Records shall document the response provided by retaining a copy of the request and the response to the request. In addition, the Custodian of Records shall either retain a copy of the documents provided or a brief description of them.

VII. Request for Searches

Any search request that will require more than 30 minutes of staff time may be declined without an advance deposit for the estimated time required to search for the records.

VIII. Fees for Retrieval and Copies

Fees for copying records shall not exceed ten cents per page for a paper copy not larger than nine by fourteen inches, with the hourly fee for duplicating time not to exceed the average hourly rate of pay for clerical staff of the Authority. Research time required for fulfilling records requests will be charged at the actual cost of research time. Based on the scope of the request, the Authority shall produce the copies using employees that result in the lowest amount of charges for search, research, and duplication time.

Fees for providing access to public records maintained on computer facilities, recording tapes or disks, videotapes or films, pictures, maps, slides, graphics, illustrations or similar audio or visual items or devices, and for paper copies larger than nine by fourteen inches shall include only the actual cost of copies, staff time, which shall not exceed the average hourly rate of pay for staff of the Authority required for making copies and programming, if necessary, and the cost of the disk, or other medium used for the duplication.

If programming is required beyond the customary and usual level to comply with a request for records or information, the fees for compliance may include the actual costs of such programming.

Payment of such copying fees may be requested prior to the making of copies.

IX. Waiver of Fees

The Custodian of Records may elect to waive the collection of any of the fees totaling less than \$5 provided in Section Eight. No person or organization shall receive more than 3 such waivers in any 12 month period.

X. Authorized Recipients of Closed Records

No closed records shall be released to any person who is not a part of the Authority's staff, except that the Authority's auditor may see such records as are reasonably necessary to prepare an audit report as requested by the Authority. The Authority's outside counsel may see such records as are reasonably necessary to represent the Authority and, in addition, closed records are available to the U. S. Department of Housing and Urban Development.

XI. Notice of Meetings

The Authority will give notice of the time, date, place and tentative agenda of each meeting of the Board of Commissioners at least 24 hours (exclusive of holidays and weekends) prior to the meeting unless an emergency makes it impossible to do so.

The Custodian of Records shall establish a fixed place where all public notices and agenda will be posted. This notice board must either be located at the Authority's central office or at the building in which the meeting is to be held.

XII. Normal Meeting Place, Time, and Date

Regular meetings of the Authority are held on the fourth Thursday of the month at the Authority's central office located at 3520 Page Boulevard, St. Louis, MO 63106 at 4:30 p.m., except when a different time and place are agreed upon by the Board of Commissioners.

EXECUTIVE DIRECTOR REPORT

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Executive Director

Date: May 21, 2026

Subject: Executive Director Report

I am pleased to present the monthly activity report highlighting the strategic, operational, and community milestones achieved across the St. Louis Housing Authority (SLHA). Our collective efforts continue to strengthen our internal infrastructure, expand resident self-sufficiency, and future-proof our affordable housing assets.

Planning for the Future: FY 2026 Agency Plan

The draft FY 2026 Agency Plan is currently available for online review during its 45-day comment period. SLHA is actively seeking valuable input from the Board, SLHA families, and community stakeholders. The draft plan was presented to the City-Wide TAB on May 20, 2026 for their review and feedback. Further participation is encouraged through a virtual town hall meeting on May 27, 2026, and an in-person public hearing at SLHA at 3 p.m. on June 15, 2026. All public comments will be carefully considered in the finalization of the plan.

Asset Repositioning: Insulating and Renewing Our Portfolio

In alignment with HUD's strategic emphasis on the Rental Assistance Demonstration (RAD) program, SLHA is making significant strides to shield our subsidized units from federal funding volatility. By transitioning these assets to a more stable financial platform, we protect our families and reinforce the agency's long-term operational health. Currently, 30% of the SLHA portfolio is actively moving through this repositioning process. Our team is working diligently to prepare for multiple critical real estate closings this calendar year, including the highly anticipated Phase I of the Clinton-Peabody redevelopment, Murphy Park (Phases II & III), and King Louis Square (KLS).

To address critical infrastructure needs, the agency continues to aggressively pursue high-impact external funding opportunities. We recently submitted a competitive \$4.8 million grant application under HUD's *Capital Improvements for At-Risk/Receivership/Substandard/Troubled PHAs Program*. If awarded, these funds will fully revitalize 19 offline units at Cochran Plaza that have experienced long-term vacancies exceeding

150 days, successfully returning them to our active housing stock. Furthermore, we have submitted a targeted proposal under HUD's FY 2026 Emergency Safety and Security Grant (ESSG) Program, reinforcing our ongoing commitment to strengthening security infrastructure and ensuring peace of mind across all SLHA communities.

Housing Choice Voucher (HCV) Performance & Equity Navigation

The Housing Choice Voucher (HCV) program continues to operate at a peak 100% utilization rate. While this exceptional performance limits our capacity to issue new vouchers at this time, our focus has successfully shifted toward maximizing leasing success and equity for families navigating a tight rental market. In April 2026, program participants achieved a strong estimated leasing success rate of 70%.

Our data indicates that families with significant disabilities face the most acute barriers to securing appropriate housing. To bridge this gap and prevent housing instability, SLHA is expanding partnerships with regional health and disability supportive service providers to pair these households with dedicated navigation assistance. Concurrently, the agency is utilizing federal flexibilities under 24 CFR 982.303(b)(1) to extend approved leasing timeframes as a standard reasonable accommodation.

In tandem with rental stability, the agency is aggressively championing economic mobility. Following our highly successful inaugural Homeownership Accelerator in April, SLHA is maintaining momentum through our participation in the Center for Community Progress National HCV Homeownership Cohort alongside the St. Louis City Land Reutilization Authority (LRA). To expand this affordable homeownership infrastructure region-wide, SLHA collaborated with 12 regional housing funders and providers to submit a joint \$2 million application to the Wells Fargo and Enterprise Housing Affordability Breakthrough Challenge.

Finally, our ability to serve vulnerable populations was further strengthened by a recent additional award of HUD-VASH vouchers, expanding our targeted, life-saving support for veterans experiencing or facing the risk of homelessness across the St. Louis region.

Human Capital: Resident Mobility & Summer Engagement

Our Resident Initiatives Department continues to achieve historic milestones, transforming our communities into true launchpads for economic mobility:

- **ROSS Program:** Reached its maximum enrollment goal of 200 active participants, marking a 27.4% increase over the last 12 months.
- **Family Self-Sufficiency (FSS) Program:** Achieved a remarkable 56.25% enrollment growth over the same 12-month period, reflecting the deep trust and commitment of our families along their economic journeys.
- **Job Readiness Expansion:** SLHA is launching a new strategic partnership with Employment Connection to bring site-based job readiness and employment training directly into our public housing developments.

- **The SLU Scholarship Relaunch:** In alignment with our Strategic Plan goals to foster community advancement, we are officially relaunching our former scholarship program partnership with Saint Louis University (SLU). This exclusive program will provide tuition support across undergraduate, graduate, professional, and adult continuing education tracks. Crucially, the fund is designed to be multi-generational — open to current SLHA residents, their dependents, and SLHA staff members of all ages.
- **Summer Youth & Family Mobilization:** Preparations are complete for a high-impact summer engagement calendar, highlighted by:
 - **The Summer Food Program:** Providing vital nutritional security across June and July.
 - **Lincoln University's Bridging the Gap Summer Institute:** Launching mid-June at the Al Chappelle Center, focusing on immersive STEM curriculum and Urban Agriculture for our youth.

Digital Transformation: Accelerating Administrative Efficiency

We continue to aggressively digitize the agency's back-end operations to reduce administrative burdens, eliminate processing delays, and strengthen regulatory compliance. Building on the recent successful launch of our new online lease certification platform, we are continually expanding our portal's capabilities to automate and centralize essential business functions. Parallel to this effort, progress remains firmly on track for the implementation of a unified, fully digitized payment system. This comprehensive financial ecosystem will support modern electronic transactions for vendors, landlords, and program participants, while introducing secure online rent payment options for our residents.

Complementing these operational upgrades, our ongoing transition to modern HR platforms is successfully standardizing internal workflows across recruitment, applicant tracking, onboarding, professional development, and performance management, ultimately fostering a lasting culture of institutional excellence.