



October 1, 2026—September 30, 2027

Submitted to the U.S. Department of Housing and Urban Development (HUD)
for the
Community Development Block Grant (CDBG) and Home Investment
Partnerships (HOME) Programs

Mark A. Kern, Chairman
St. Clair County Board

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

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

This Program Year 2026 (PY 2026) Annual Action Plan provides a basis and strategy for the use of federal funds granted to St. Clair County, the City of East St. Louis, and the City of Belleville by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. This Action Plan covers the period beginning October 1, 2026, and ending September 30, 2027. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of St. Clair County, neighborhoods with high concentrations of low- and moderate-income residents, other county residents and neighborhoods through the prevention and/or elimination of slums and blight, and the County as a whole. Funds will be distributed to eligible activities throughout St. Clair County. The County also uses this plan to coordinate with other federal and state grant programs and local initiatives.

The priorities and goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, St. Clair County has used the presumption of level funding for each program at Federal Fiscal Year 2026 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, these projections and planned activities are subject to change with availability of funding. Fluctuations in funding levels will affect the County's ability to achieve the accomplishments anticipated herein.

In addition to the annual allocations of HOME and CDBG funds, St. Clair County received CDBG-CV and HOME-ARP funding allocations. St. Clair County is working with a not-for-profit group to utilize both CDBG-CV to construct 16 units of permanent supportive housing for the homeless. The same not-for-profit group will also utilize HOME ARP to rehab an additional 10-12 units of permanent supportive housing. The group has started construction on the 16-unit structure and is working to complete sewer repairs for the rehab project prior to start of any rehabilitation. Finally, St. Clair County has been awarded \$30,027,000 in CDBG-DR funds under grant number B-23-UN-17-001 and has successfully completed the allocation plan that focuses on deploying these funds to improve infrastructure in impacted areas. Contracts have been issued to municipalities and environmental reviews are complete.

Additionally, in 2024, CDBG-DR (Disaster Recovery) funds in the amount of \$89,533,000 have been awarded to St. Clair County respectively, to aid in the recovery from disaster events. The allocation plan has been successfully submitted and approved. These funds will be utilized for infrastructure, housing, and economic revitalization programs and include a set-aside for mitigation activities of impacted areas. The County is currently updating all policies and procedures to align with DR requirements and intends to publish a NOFO and applications for all programs within the next year. When prepared the NOFA and application materials will be made available on St. Clair County's website:

<https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development?subDirectory=DocDirWebDocuments\Departments\jgd\communityDevelopment\CDBG%24DR>

2. Summarize the objectives and outcomes identified in the Plan

Infrastructure improvements will remain the primary focus of the CDBG program, and the rehab of single-family affordable housing and home buyer assistance will remain the focus of the HOME program.

In addition to using the limited amounts of HUD funds available for these purposes, the County will continue to use other federal local and state economic development incentives. To address the priorities, concerns and availability of funding, St. Clair County proposes the following allocations for Program Year 2026 which includes the annual allocations made available by HUD and remaining prior year funds from PY 2020-2025:

- \$4,258,216 in Community Development Block Grant funds for capital improvements, housing rehabilitation, and for planning and administration.
- \$1,729,814.09 in Home Investment Partnerships Program (HOME) funds for housing rehabilitation, housing development, homebuyer assistance, and planning and administration.

A table showing the 2020-2025 Prior Year resources that are included in the amounts above can be found on Page 20 of this plan.

3. Evaluation of past performance

St. Clair County has a long history of effectively administering the programs included in the Consolidated Plan. The most recently completed program year, 2024, was the fourth of the 2020-2024 five-year Consolidated Planning cycle.

In 2024, St. Clair County exceeded its Consolidated Plan goals in the following areas:

- Public facilities and improvements: The County's PY 2020-PY 2024 goal for public facilities and improvements was to complete 78 projects. Fifteen (15) public facilities and infrastructure improvement projects in low-moderate income areas were completed in PY 2024. These

represent 94% of our goal of sixteen (16) projects. However, our five-year goal was to complete 78 projects, and we have completed 86 projects which is 110% of our five-year goal.

- **Housing Rehabilitation:** The County's PY 2020-2024 goal for single-family rehab is to complete 92 projects and in PY 2024, we completed 26 projects, falling short of our annual goal of 35 projects. However, overall, we have completed 107 projects, which represents 116% for our strategic five-year Consolidated Plan goal of 92 projects. The original 5-year goal was established at 264 homes, pre pandemic on average we would complete approximately 50 homes per year. During 2020-2021, it was impossible to inspect properties as County staff and contractors could not safely enter homes. The Post pandemic, the County resumed this activity, completing 18-20 homes per year. Following the pandemic, material cost increases combined with lead and environmental review requirements resulted in several contractors leaving the program. We have continued to solicit contractors in several ways with little success. As a result, the County's request to amend the 2020-2024 Consolidated Plan to decrease the strategic plan goal of homes rehabilitated from 264 to 92 was approved.
- **Homebuyer Down Payment Assistance:** The County's PY 2020- 2024 homebuyer assistance goal is to provide assistance to 90 low-moderate homebuyers, with a goal of 10 in PY 2024. In PY 2024, we assisted thirteen (13) homebuyers, which is 130% of our annual goal and which brings us to 91% of our five-year goal.
- **Affordable Housing Development:** The County set a goal of 4 affordable homes to be developed with HOME assistance in PY 2024. Two (2) homes were completed by CHDOs (100%) and a further two (2) affordable rental homes were completed. Additionally, another rental development with 4 homes is under construction. The County's five-year goal for affordable housing development is 15 homes completed, and 14 have been completed and a further two are nearing completion at 91% and 74% completion.

4. Summary of Citizen Participation Process and Consultation Process

This plan is the product of extensive public outreach, multiple public hearings, and consultation with dozens of agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities and homeless persons. A complete draft of this plan was made available for public review and comment for a 30-day period beginning June 1, 2026 and going until July 2, 2026. The availability of both the draft plan and the final plan was advertised in the local newspaper and the complete documents are available for review on the County's website (www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx) and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624) and at the County Courthouse and various public libraries, senior/community centers, and village/city halls throughout the County. It was made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

5. Summary of Public Comments

Summaries of the public meeting presentations and any citizen comments received are provided in the attachments to the final 2026 Annual Action Plan titled "PY 2026 Public Hearing Meeting Minutes". Public comments pertaining to LIHEAP, eligible activities, specific projects, and FEMA funding were received from two attendees at the Public Hearing held at the Village of Caseyville on May 12, 2026. Staff responded to each comment as detailed in the minutes.

6. Summary of Comments or Views Not Accepted and The Reasons for Not Accepting Them

There were no views or comments not accepted from the first or second round of Public Hearings for consideration in the development of the 2026 Annual Action Plan.

7. Summary

St. Clair County currently receives annual funding from two programs administered at the federal level by HUD. They are:

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

The priorities and goals outlined in this Consolidated Plan are based on assumptions about future funding levels for these programs. In all cases, St. Clair County has used the presumption of level funding for each program at Federal Fiscal Year 2026 levels as outlined below. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, these projections and planned activities are subject to change with availability of funding. Fluctuations in funding levels will affect the County's ability to achieve the accomplishments anticipated herein.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ST. CLAIR COUNTY	Intergovernmental Grants Department (IGD)
HOME Administrator	ST. CLAIR COUNTY	Intergovernmental Grants Department (IGD)

Table 1 – Responsible Agencies

Narrative

St. Clair County places a high priority on the coordination and leveraging of resources and services with other public and private resources. IGD has a Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville and the City of East St. Louis, so the Community Development Group will continue to administer Belleville's and East St. Louis' CDBG and HOME funds.

Annual Action Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

St. Clair County places a high priority on the coordination and leveraging of resources and services with other public and private resources. IGD has a Cooperation Agreement and a HOME Consortium Agreement with the City of Belleville and the City of East St. Louis, so the Community Development Group will continue to administer Belleville's and East St. Louis' CDBG and HOME funds. In addition, IGD administers the Community Services Block Grant (CSBG); Low Income Home Energy Assistance Program (LIHEAP); Weatherization Assistance Program; and HUD Continuum of Care grants in conjunction with the St. Clair County Homeless Action Council programs.

IGD's Workforce Development Group coordinates the Workforce Innovation & Opportunity Act (WIOA) Program in St. Clair County. Local Workforce Area (LWA) #24 provides employment and training services through the Mid-America Workforce Investment Board, comprised of businesses, economic development, education, labor, and community-based organizations, and partners in local One-Stop Centers. The partners include, but are not limited to:

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

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

IGD will continue to provide a meeting place and clerical services for the Community Action Agency (CAA). The IGD Director serves as Executive Director of the 18-member board of directors. Through IGD's CS Group the CAA provides a range of services that assist low-income individuals to attain skills, knowledge, and motivation necessary to achieve self-sufficiency. Services available through the CAA include emergency crisis intervention, scholarships, clothing assistance, family development,

transportation, food vouchers, medical/dental vouchers, temporary emergency shelter, prescription vouchers, utility assistance, homeless/near homeless assistance, recreational activities, advocacy, case management, information, and referrals.

The CAA has developed partnerships with other social service providers and faith-based organizations to ensure that the needs of the low-income population are being addressed. Those partnerships include, but are not limited to:

- Illinois Department of Human Services
- Catholic Urban Program
- St. Clair County Housing Authority
- Homeless Action Council
- Programs and Services for Older Persons
- Living Independently Now Center (LINC), Inc.
- American Red Cross
- Court Appointed Special Advocate (CASA)
- Division of Employment Security One-Stop Centers

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

In the coming year, IGD will also continue to provide staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in their efforts to end homelessness. The Housing Resource Center (HRC) also operates under the IGD umbrella. It will continue to operate Continuum of Care Programs for the homeless and near homeless. IGD promotes housing counseling, education, and fair housing throughout St. Clair County.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

While St. Clair County does not receive a direct allocation of ESG, the County coordinates closely with the CoC to ensure that goals, resources, and policies are aligned to most effectively address the needs of homeless persons, including facilitating their transition to PSH or RRH housing options if available.

Specific actions that the CoC will undertake this year to meet these goals are:

- Work with the Housing Resource Center and Homeless Action Counsel in identifying needed resources for shelter and transitional housing participants.
- Provide training through the CoC to provide support to agency staff and shelter volunteers who work directly with homeless persons to assess their needs and facilitate access to the appropriate corresponding resources.
- Apply for additional Federal and State funds as the CoC lead.

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	St. Clair County Intergovernmental Grants
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	IGD coordinates with state and local governments to administer programs.
2	Agency/Group/Organization	Homeless Action Council Continuum of Care
	Agency/Group/Organization Type	Continuum of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. Ongoing trainings to coordinate programs to serve the homeless occur throughout the year.

3	Agency/Group/Organization	Urban League
	Agency/Group/Organization Type	Services-Children Services-Employment Services-Education
	What section of the Plan was addressed by Consultation?	Youth, Education, and Employment Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Urban League also provides ESG services through State funding and accepts those referrals from CE.
4	Agency/Group/Organization	Mid America Workforce Investment Board
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	WIOA provides partnership agreements each year. Accepts referrals from agencies to offer training to homeless participants in their programs.
5	Agency/Group/Organization	St. Clair County Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. Ongoing trainings to coordinate programs to serve the homeless occur throughout the year and provide vouchers when available.

6	Agency/Group/Organization	St. Clair County Emergency Management Agency
	Agency/Group/Organization Type	Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Broadband/Hazard Mitigation/Public Health
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through meeting attendance and coordination with IGD and the COC to complete an emergency evacuation plan.
7	Agency/Group/Organization	St. Clair County Health Department
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Broadband/Hazard Mitigation
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation occurs through joint meetings, provision of case management to several clients, and provision of support service match funds.
8	Agency/Group/Organization	Lessie Bates Davis Neighborhood House
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Neighborhood Organization

	What section of the Plan was addressed by Consultation?	Youth, Education, and Food Access Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. Ongoing trainings to coordinate programs to serve the homeless occur throughout the year.
9	Agency/Group/Organization	Illinois Department of Human Services
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	DHS works with several local organizations through the COC providing grants for ESG, prevention, PSH, RRH and shelter diversion.
10	Agency/Group/Organization	Catholic Urban Programs
	Agency/Group/Organization Type	Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Home Repair
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	CUP also provides preventions subsidies and shelter to the homeless and near homeless. Most clients are provided to CUP through the CE referral system.
11	Agency/Group/Organization	Comprehensive Behavioral Health Center
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. CBHC works with homeless participants to provide housing, health services and case management through the CE referral process.
12	Agency/Group/Organization	Programs and Services for Older Persons
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Elderly Housing and Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation is ongoing as this agency provides resources to the COC membership.
13	Agency/Group/Organization	Living Independently Now Center (LINC), Inc.
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing and services for person with disabilities
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. Ongoing trainings to coordinate programs to serve the homeless occur throughout the year.
14	Agency/Group/Organization	Illinois Department of Employment Security
	Agency/Group/Organization Type	Services-Employment

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The department also partners with WIOA for employment services.
15	Agency/Group/Organization	Southwestern Illinois College
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Employment and job training
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. Ongoing trainings to coordinate programs to serve the homeless occur throughout the year. This organization has a strong relationship with the COC to assist our homeless with education and employment service.
16	Agency/Group/Organization	Salvation Army of St. Clair County
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Employment and health education
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Through HAC membership meeting as well as one on one meetings and training sessions. Ongoing trainings to coordinate programs to serve the homeless occur throughout the year. This agency also provides ESG and prevention services to individuals and families experiencing homeless.

17	Agency/Group/Organization	East Side Health District
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs – Veterans Homelessness Needs – Unaccompanied Youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	IGD coordinates with State and local partners to provide services and referrals for homeless participants, including this agency.

Identify any Agency Types not consulted and provide rationale for not consulting

No organization was purposely omitted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	St. Clair County IGD	Both plans address serving homelessness

Table 3 – Other local / regional / federal planning efforts

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The 2026 Annual Action Plan is the product of multiple public hearings and consultation with agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low- and moderate-income residents, and/or provision of services to children, elderly people with disabilities and homeless people. Efforts were made to broaden citizen participation by ensuring that all Public Hearing notices were posted on St. Clair County's website, provided to municipalities and the HAC membership, and put in paper of largest circulation.

The following Public Hearings were held to hear from citizens to determine the needs to be addressed by the PY 2026 Annual Action Plan at the dates, times and locations listed below:

- February 24, 2026, 10:00 AM at the Village of Brooklyn, 312 South 5th Street, Brooklyn, IL
- February 24, 2026, 2:00 PM at the Saint Clair County IGD, 19 Public Square, Suite 200, Belleville, IL
- February 25, 2026, 11:00 AM at the Village of Caseyville, 909 South Main Street, Caseyville, IL

Additional Public Hearings for citizen review and comment on the proposed PY 2026 Annual Action Plan was held on the following dates and times at the locations listed:

- May 12, 2026, 11:00 AM at Village of Caseyville, 909 South Main Street, Caseyville, IL
- May 13, 2026, 2:00 PM at the Saint Clair County Intergovernmental Grants Department, 19 Public Square, Suite 200, Belleville, IL
- May 14, 2026, 10:00 AM at Village of Brooklyn, 312 South 5th Street, Brooklyn, IL

A draft of the plan was made available for public review and comment for a 30-day period beginning on or about June 1, 2026, and ending July 2, 2026. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the County's website at www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624), various public libraries, senior/community centers, and village/city halls throughout the County. It is also made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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1	Public Meeting	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Six public hearings were held at various locations and times, as follows: - February 24, 2026, 10:00 AM at the Village of Brooklyn, 312 South 5th Street, Brooklyn, IL - February 24, 2026, 2:00 PM at the Saint Clair County IGD, 19 Public Square, Suite 200, Belleville, IL - February 25, 2026, 11:00 AM at the Village of Caseyville, 909 South Main Street, Caseyville, IL Additional Public Hearings for citizen review and comment on the proposed PY 2026 Annual Action Plan were held on the	The presentation for the public hearings was made available for public viewing and comment, and the only comments received were for information purposes and not pertaining to the allocation of resources, programs, or activities proposed in the draft PY 2026 Annual Action Plan.	There were no comments that were not accepted.	
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			following dates and times at the locations listed: • May 12, 2026, 11:00 AM at Village of Caseyville, 909 South Main Street, Caseyville, IL • May 13, 2026, 2:00 PM at the Saint Clair County Intergovernmental Grants Department, 19 Public Square, Suite 200, Belleville, IL • May 14, 2026, 10:00 AM at Village of Brooklyn, 312 South 5th Street, Brooklyn, IL A draft of the plan was made available for public review and comment for a 30-day period beginning			
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			on or about June 1, 2026 and ending July 2, 2026			
2	Newspaper Ad	Non- targeted/broad community	N/A	No comments were received.	There were no comments that were not accepted.	
3	Internet Outreach	Non- targeted/broad community	N/A	No comments were received.	There were no comments that were not accepted.	www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx
4	Flyer	Non- targeted/broad community	N/A	No comments were received.	There were no comments that were not accepted.	
5	Other (Public Comment Periods)	Non- targeted/broad community	Comment period 1 was held following the “Needs” meeting for the period of time between February 26 and March 30, 2026. The AAP Draft comment period 2 took place from June 1 through July 2, 2026.	No comments were received.	There were no comments that were not accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

In addition to the annual allocations of funds, the following Prior Year Resources are included the Expected Resources amounts:

Emergency and Accessibility

Per our Prior Year Resources chart, the oldest (2020) uncommitted funds are Emergency and Accessibility funds. The County has struggled to expend these funds due to barriers such as a lack of contractors and contractor costs exceeding the limits for these programs. At least once a year, we advertise in the newspaper of largest circulation to solicit contractors and programs. Contractor and program information is posted on the County website at all times. Responses to these RFPs are low, if any, and County insurance requirements further limit the pool of contractors that meet the criteria. Post-COVID inflation has drastically driven up the costs of construction materials and labor. Most of our emergency program applicants require roof replacements, which now consistently exceed the maximum allowable dollar limit per activity. Because we serve low/mod-income individuals, these applicants lack the funds to make up the difference when contractor bids exceed our limit. We see the same barriers with our Accessibility program, but we continue to allocate funds for these programs because, as St. Clair County, we want to offer these services to support our low/mod population, our elderly and persons with disabilities. We do plan to advertise for programs and contractors more frequently in the upcoming year.

Housing Rehabilitation

To explain the 2023 to current HOME Rehab program dollars:

The same barriers listed above, lack of contractors, contractor cost, insurance requirements continue to plague our housing rehabilitation programs. Therefore, as mentioned in our Disaster Recovery 2022 Action Plan, the County attempted to focus our rehab dollars on homes that were affected by the 2022 flood disaster. Staff targeted homes near floodplains of affected communities in hopes of helping residents rehabilitate their homes, while focusing our Disaster Recovery funds on infrastructure, which is the larger concern in the County. Several attempts were made via mail and through the communities and their mayors to solicit responses to the pre-application, with next to no response. The County has since resorted back to a rehab lottery for the

entire county and received an overwhelming response for this program year.

CHDO

We continue to move CHDO funds forward because the organization we partner with is small and completes only one to two homes at a time. We typically set our goal at two homes per program year. Staff has had limited inquiries from other organizations wanting to become a CHDO, but those organizations ran into barriers regarding staffing or having low/mod individuals represented on their boards.

Homebuyer

While the County has continued to meet or nearly meet our yearly program goals, barriers such as higher interest rates and housing inventory shortages have slowed the local real estate market. In recent years, the post COVID escalation of home prices has far exceeded what our low-to-moderate-income clientele can afford to purchase or qualify for, leading to unspent balances in these programs. Staff continues to market the program by attending realtor association gatherings, various events and the County website.

Public Facility

Public facility funds are being brought forward because various projects came in under budget, leaving the remaining funds uncommitted.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources (2021-2025): \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,452,895	0	805,321	4,258,216	10,358,685	CDBG funds will be used for public facilities and improvement projects in low-moderate income areas, single-family housing rehabilitation assistance (low-moderate income owner-occupied home repair assistance), and planning and administration. Prior year resources are from 2020-2025 (See Table)
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	803,505.03	0	926,309	1,729,814.03	2,410,515.27	HOME funds will be used for single-family housing rehabilitation assistance (low-moderate income owner-occupied home repair assistance), low-moderate income home buyer assistance, and affordable home development. Prior year resources are from 2020-2025 (See Table)

Table 5 - Expected Resources – Priority Table

PRIOR YEAR RESOURCES							
	2020	2021	2022	2023	2024	2025	
SCC CDBG Loan Recapture						\$ 321	
SCC CDBG Rehab				\$ 5,000	\$ 5,000		
SCC CDBG Emergency	\$ 12,000	\$ 5,000	\$ 19,000		\$ 5,000		
SCC CDBG Accessibility						\$ 10,000	
SCC CDBG Demolition						\$ -	
SCC CDBG Public Facilities					\$ 197,000		
	\$ 12,000	\$ 5,000	\$ 19,000	\$ 5,000	\$ 207,000	\$ 10,321	
TOTAL SCC CDBG REPROGRAMMED:							\$ 258,321
SCC Homebuyer				\$ 23,000			
SCC New Construction							
SCC CHDO				\$ 86,000	\$ 200,000		
SCC HOME Rehab			\$ 120,000	\$ 200,000	\$ 40,000		
	\$ -	\$ -	\$ 120,000	\$ 309,000	\$ 240,000	\$ -	
TOTAL SCC HOME REPROGRAMMED:							\$ 669,000
ESL CDBG Loan Recapture					\$ -	\$ -	
ESL CDBG Public Facilities							
ESL CDBG Rehab		\$ 17,001	\$ 200,000	\$ 99,999	\$ 100,000	\$ 100,000	
ESL CDBG Emergency	\$ 5,000	\$ 5,000	\$ 5,000			\$ -	
ESL CDBG Accessibility	\$ 5,000	\$ 5,000	\$ 5,000			\$ -	
	\$ 10,000	\$ 27,001	\$ 210,000	\$ 99,999	\$ 100,000	\$ 100,000	
TOTAL ESL CDBG REPROGRAMMED:							\$ 547,000
ESL Homebuyer					\$ 10,000	\$ 10,000	
ESL New Construction							
ESL CHDO				\$ 33,236	\$ 23,073	\$ 20,000	
ESL HOME Rehab				\$ 65,000	\$ 48,000	\$ 48,000	
	\$ -	\$ -	\$ -	\$ 98,236	\$ 81,073	\$ 78,000	
TOTAL ESL HOME REPROGRAMMED:							\$ 257,309

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The required HOME match will be met through appraised land/real property and previous match available carryover. Along with CDBG and HOME funds, St. Clair County expects to receive and administer Community Services Block Grant, Low Income Home Energy Assistance Program, Workforce Innovation & Opportunity Act, McKinney- Vento Homeless Assistance Act. The following grants (if successful applications are made) Illinois Housing Development Authority Trust Funds, Federal Home Loan Bank funds, Affordable Housing Program funds, Low-Income Housing Tax Credits, Section 8 Housing Choice Vouchers and Lead Hazard Control Grant funds will be available to address the needs identified in its strategic plan. The County continues to apply for additional grants from the public and private sectors for additional leverage resources to carry out the activities in this Consolidated Plan.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The County Zoning Department continues to demolish County Trustee properties, creating land that may possibly be used in the future for neighborhood revitalization activities.

Discussion

The County CDBG and HOME programs do not have TBRA or Economic Development; however, I cannot remove these selections in IDIS.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities Improvements	2026	2027	Non-Housing Community Development	St. Clair County & City of Belleville (Area Benefit) East St Louis (Area Benefit)	Public Facilities & Infrastructure Improvements	CDBG: \$3,362,637.40 HOME: \$0	Other: 15 Other
2	Single-Family Rehab Programs	2026	2027	Affordable Housing	St. Clair County & City of Belleville (Low/Mod Income Household Benefit) East St Louis (Low/Mod Income Household Benefit)	Housing Development - New Construction Housing Development - Acquisition/Rehab	CDBG: \$205,000 HOME: \$502,500	Housing Rehabilitated: 32 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Affordable Housing Development	2026	2027	Affordable Housing	St. Clair County & City of Belleville (Low/Mod Income Household Benefit) East St Louis (Low/Mod Income Household Benefit)	Housing Rehabilitation Housing Development - New Construction	CDBG: \$0 HOME: \$1,019,463.53	Housing Added: 7 Household Housing Unit
4	Homebuyer Assistance	2026	2027	Affordable Housing	St. Clair County & City of Belleville (Low/Mod Income Household Benefit) East St Louis (Low/Mod Income Household Benefit)	Homebuyer Down Payment Assistance	CDBG: \$0 HOME: \$127,500	Direct Financial Assistance to Homebuyers: 17 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Administration/Planning	2026	2027	Administration	St. Clair County & City of Belleville (Area Benefit) East St Louis (Area Benefit) St. Clair County & City of Belleville (Low/Mod Income Household Benefit) East St Louis (Low/Mod Income Household Benefit)	Public Services/Homeless/Non-Homeless Special Need Public Facilities & Infrastructure Improvements Housing Rehabilitation Housing Development - New Construction Homebuyer Down Payment Assistance Housing Development - Acquisition/Rehab	CDBG: \$690,578.60 HOME: \$80,350.50	Other: 5 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Public Facilities Improvements
	Goal Description	Public Facilities Improvements: Infrastructure improvements including sewers, sidewalks, streets, etc.
2	Goal Name	Single-Family Rehab Programs
	Goal Description	Single-Family Rehab Programs to rehabilitate single-family homes owned and occupied by low-to-moderate income homeowners.
3	Goal Name	Affordable Housing Development
	Goal Description	Single and Multi-Family new for-sale and/or rental housing development or acquisition/rehab of existing housing for low-to-moderate income residents.
4	Goal Name	Homebuyer Assistance
	Goal Description	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
5	Goal Name	Administration/Planning
	Goal Description	Administration and planning for grant management.

Projects

AP-35 Projects – 91.220(d)

Introduction

Note that each project listed below begins with the code SCC or ESL. While IGD has identified County-wide goals across programs, the East St. Louis CDBG allocation will be spent only within the jurisdiction of East St. Louis.

Projects

#	Project Name
1	SCC - Public Facilities & Improvements
2	SCC - Single-Family Housing Rehab Assistance
3	SCC - Single-Family Accessibility Assistance
4	SCC - Single-Family Emergency Home Repair Assistance
5	SCC - Single-Family Rehab Program Delivery
6	SCC - Homebuyer Assistance
7	SCC - Homebuyer Assistance Program Delivery
8	SCC - Affordable Housing Development
9	SCC - Affordable Housing Development (CHDO)
10	SCC - Planning and Administration
11	ESL - Public Facilities & Improvements
12	ESL - Single-Family Housing Rehab Assistance
13	ESL - Single-Family Accessibility Assistance
14	ESL - Single-Family Emergency Home Repair Assistance
15	ESL - Single-Family Rehab Program Delivery
16	ESL - Homebuyer Assistance
17	ESL - Homebuyer Assistance Program Delivery

#	Project Name
18	ESL - Affordable Housing Development
19	ESL - Affordable Housing Development (CHDO)
20	ESL - Planning and Administration

Table 7 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The County’s allocation priorities are based on a combination of public input, past program success, and meeting the most urgent needs of underserved communities. The most significant obstacle to addressing underserved needs is the limited availability of resources. These funding constraints limit the number, type, and level of assistance for programs aimed at meeting underserved needs within the community.

In response to our assessment of underserved needs, St. Clair County will offer homebuyer counseling and down payment and closing cost assistance to low- and moderate-income homebuyers to overcome obstacles to becoming new homeowners. Comprehensive housing counseling services will be provided to the near homeless, homeless and chronically homeless to prevent homelessness and to build self-sufficiency for those who are already homeless. Additionally, the County provides training and Technical Assistance not only to prospective homeowners, but to realtors and lenders, ensuring that they understand the programmatic requirements and particular needs of low- and moderate-income homebuyers.

In St. Clair County, the quality, condition, and age of the housing stock combined with a significant low-to-moderate income population support the allocations made for the programs that offer home repair, emergency home repair assistance and home accessibility improvements to low- and moderate-income homeowners. These programs help sustain these individuals and families in their homes.

As part of our efforts to overcome obstacles in addressing underserved needs, IGD will seek to leverage funds wherever possible to make affordable housing development more financially feasible in the older, poorer, minority communities. We will also provide infrastructure improvements that help to overcome some of the obstacles, making these areas more viable.

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

offer loans to businesses in low-income areas.

Finally, St. Clair County follows policies and procedures that promote outreach to all potentially eligible households, especially those least likely to apply for assistance. These policies and procedures are designed to ensure that the owners of properties assisted with community development funds employ marketing plans that provide information and otherwise attract eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status (persons with children under 18 years of age, including pregnant women) or disability, and also to persons with special needs. The County markets all programs, including housing rehabilitation and down payment assistance, in a manner consistent with the law. In order to increase knowledge and awareness of these programs, all policies and procedures are provided in full on the St. Clair County website and Ads are placed in local newspapers for the various programs. Surveys were distributed when preparing the Consolidated Plan, ensuring that the priorities established within the plan reflect the priorities of underserved populations and are established to address obstacles in meeting underserved needs.

AP-38 Project Summary
Project Summary Information

1	Project Name	SCC - Public Facilities & Improvements
	Target Area	St. Clair County & City of Belleville (Area Benefit)
	Goals Supported	Public Facilities Improvements
	Needs Addressed	Public Facilities & Infrastructure Improvements
	Funding	CDBG: \$1,819,159
	Description	Public Facility grants for 15 Public Facilities Improvement projects such as Infrastructure improvements including sewers, sidewalks, streets, etc.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This is an area benefit activity, so the entire LMI population of 123,190 persons, which represents 47.80% of St. Clair County's population.
	Location Description	To be determined
	Planned Activities	Grantees will make improvements to public facilities
2	Project Name	SCC - Single-Family Housing Rehab Assistance
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Housing Development
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$0 HOME: \$360,000
	Description	Single-Family Rehab Forgivable Loan Program to rehabilitate single-family homes owned and occupied by low-to-moderate income homeowners.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated for 15 families.
	Location Description	Various locations

	Planned Activities	Rehabilitation of single-family homes owned by low/mod income households
3	Project Name	SCC - Single-Family Accessibility Assistance
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$10,000
	Description	ADA Wheel Chair Ramps / LINC Rehabilitation of low-mod income homeowner occupied housing units.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated for 2 families.
	Location Description	Various locations
	Planned Activities	Rehabilitation of single-family homes owned by low/mod income households
4	Project Name	SCC - Single-Family Emergency Home Repair Assistance
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$10,000
	Description	CDBG Single-Family Emergency Repair Assistance for low-mod income households to maintain safe, decent housing conditions.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated for 2 families.
	Location Description	Various locations

	Planned Activities	Rehabilitation of single-family homes owned by low/mod income households
5	Project Name	SCC - Single-Family Rehab Program Delivery
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$15,000 HOME: \$70,000
	Description	Program Delivery for Housing Rehab Activities in PY 2026.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Other: 1 Program Delivery for activities benefiting 32 families.
	Location Description	N/A
	Planned Activities	Program delivery
6	Project Name	SCC - Homebuyer Assistance
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Homebuyer Assistance
	Needs Addressed	Homebuyer Down Payment Assistance
	Funding	HOME: \$75,000
	Description	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Direct Financial Assistance to Homebuyers for 15 families.
	Location Description	Various locations
	Planned Activities	Down Payment and Closing Cost Assistance for Homebuyers.
	Project Name	SCC - Homebuyer Assistance Program Delivery

7	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Homebuyer Assistance
	Needs Addressed	Homebuyer Down Payment Assistance
	Funding	HOME: \$32,500
	Description	Program Delivery for Homebuyer Assistance Program in PY 2026
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Other: 1 Program Delivery
	Location Description	N/A
	Planned Activities	Program delivery
8	Project Name	SCC - Affordable Housing Development
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	Goals Supported	Affordable Housing Development
	Needs Addressed	Housing Development - New Construction
	Funding	HOME: \$324,023.63
	Description	New home development using HOME funds to create new Single or Multi-Family new for-sale and/or rental housing or acquisition/rehab of existing housing for low-to-moderate income residents.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added for 2 families
	Location Description	Various locations
9	Project Name	SCC - Affordable Housing Development (CHDO)
	Target Area	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)

	Goals Supported	Affordable Housing Development
	Needs Addressed	Housing Development - New Construction Housing Development - Acquisition/Rehab
	Funding	HOME: \$386,000
	Description	CHDO SET ASIDE - New Construction/Acq. & Rehab of Single-Family homes for low-mod income households using CHDO HOME funds
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added for 2 families
	Location Description	Various locations
	Planned Activities	New Construction/Acq. & Rehab of Single-Family homes using CHDO HOME funds
10	Project Name	SCC - Planning and Administration
	Target Area	St. Clair County & City of Belleville (Area Benefit)
	Goals Supported	Administration/Planning
	Needs Addressed	Public Services/Homeless/Non-Homeless Special Need Public Facilities & Infrastructure Improvements Housing Rehabilitation Housing Development - New Construction Homebuyer Down Payment Assistance Housing Development - Acquisition/Rehab
	Funding	CDBG: \$398,959 HOME: \$64,280.40
	Description	Administration for programs offered by St. Clair County for CDBG and HOME activities.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	This is an area benefit activity, so the entire LMI population of 123,190 persons, which represents 47.80% of St. Clair County's population.
	Location Description	N/A

	Planned Activities	Planning and Administration
11	Project Name	ESL - Public Facilities & Improvements
	Target Area	East St Louis (Area Benefit)
	Goals Supported	Public Facilities Improvements
	Needs Addressed	Public Facilities & Infrastructure Improvements
	Funding	CDBG: \$1,543,478.40
	Description	Public Facility grants for Public Facilities Improvements such as Infrastructure improvements including sewers, sidewalks, streets, etc.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The entire LMI population of 20,250 persons or 77.3 % of the East St. Louis population will benefit from this activity.
	Location Description	To be determined
	Planned Activities	Grantees will make improvements to public facilities
12	Project Name	ESL - Single-Family Housing Rehab Assistance
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$120,000 HOME: \$50,000
	Description	Single-Family Rehab Forgivable Loan Program to rehabilitate single-family homes owned and occupied by low-to-moderate income homeowners.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated for 7 families.
	Location Description	Various locations

	Planned Activities	Rehabilitation of single-family homes owned by low/mod income households
13	Project Name	ESL - Single-Family Accessibility Assistance
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$15,000
	Description	ADA Wheelchair Ramps / LINC Rehabilitation of low-mod income homeowner occupied housing units.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated for 3 families.
	Location Description	Various locations
	Planned Activities	Rehabilitation of single-family homes owned by low/mod income households
14	Project Name	ESL - Single-Family Emergency Home Repair Assistance
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$15,000
	Description	CDBG Single-Family Emergency Repair Assistance for low-mod income households to maintain safe, decent housing conditions.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated for 3 families.
	Location Description	Various locations
	Planned Activities	Rehabilitation of single-family homes owned by low/mod income households
	Project Name	ESL - Single-Family Rehab Program Delivery

15	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Single-Family Rehab Programs
	Needs Addressed	Housing Rehabilitation
	Funding	CDBG: \$20,000 HOME: \$22,500
	Description	Program Delivery for Housing Rehab Activities in PY 2026.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Other: 1 Program Delivery for activities benefiting 13 families.
	Location Description	N/A
	Planned Activities	ESL - Program delivery
16	Project Name	ESL - Homebuyer Assistance
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Homebuyer Assistance
	Needs Addressed	Homebuyer Down Payment Assistance
	Funding	HOME: \$10,000
	Description	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Direct Financial Assistance to Homebuyers for 2 families.
	Location Description	Various locations
17	Planned Activities	Down Payment and Closing Cost Assistance for Homebuyers.
	Project Name	ESL - Homebuyer Assistance Program Delivery
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Homebuyer Assistance
	Needs Addressed	Homebuyer Down Payment Assistance
	Funding	HOME: \$10,000

	Description	Program Delivery for Homebuyer Assistance Program in PY 2026
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Other: 1 Program Delivery for Homebuyer Assistance for 2 families.
	Location Description	N/A
	Planned Activities	Program delivery
18	Project Name	ESL – Affordable Housing-Development
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Affordable Housing Development
	Needs Addressed	Housing Development - New Construction
	Funding	HOME: \$233,130.90
	Description	New Single or Multi-Family Family home development using HOME funds to create new for-sale or rental housing or acquisition/rehab of existing housing for low-to-moderate income residents.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added for 2 families.
	Location Description	Various locations
	Planned Activities	Affordable home development
19	Project Name	ESL - Affordable Housing Development (CHDO)
	Target Area	East St Louis (Low/Mod Income Household Benefit)
	Goals Supported	Affordable Housing Development
	Needs Addressed	Housing Development - New Construction Housing Development - Acquisition/Rehab
	Funding	HOME: \$76,309
	Description	CHDO SET ASIDE - New Construction/Acq. & Rehab of Single-Family homes for low-mod income households using CHDO HOME funds

	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Added for 1 family.
	Location Description	Various locations
	Planned Activities	Affordable home development
20	Project Name	ESL - Planning and Administration
	Target Area	East St Louis (Area Benefit)
	Goals Supported	Administration/Planning
	Needs Addressed	Public Facilities & Infrastructure Improvements Housing Rehabilitation Affordable Housing Development - New Construction Homebuyer Down Payment Assistance Housing Development - Acquisition/Rehab
	Funding	CDBG: \$291,619.60 HOME: \$16,070.10
	Description	Administration for programs offered by St. Clair County for CDBG and HOME activities.
	Target Date	9/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	The entire LMI population of 20,250 persons or 77.3 % of the East St. Louis population will benefit from this activity.
	Location Description	N/A
	Planned Activities	Administration for programs offered by St. Clair County for CDBG and HOME activities.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Program Year 2026 Action Plan activities funded through the CDBG program will be concentrated in low/moderate income areas, although some will benefit limited low-moderate income clientele and some limited activities may be provided to other areas that are exhibiting signs of slums or blight. The areas in St. Clair County with the highest low income and minority concentrations tend to be located in the “American Bottoms” area, including East St. Louis. St. Clair County will allocate funds geographically to ensure that East St. Louis funds will only be used for activities conducted within the boundaries of the City of East St. Louis to address these high needs.

IGD expects that the majority of activities to be carried out with the County’s CDBG and HOME funds will fall within two general categories—Public Facilities and Improvements, and Housing. St. Clair County will allocate a significant portion of CDBG funds, approximately 56%, to assist public facilities and improvements in the County, including East St. Louis. Housing activities (rehabilitation of existing housing, affordable housing development and homeownership assistance) will be targeted to households at low to moderate income levels throughout the County. HOME funds must be utilized for housing activities benefiting low- and moderate-income households and will be targeted accordingly.

Overall, 56% of all funds (CDBG and HOME) will be used for public facilities improvements; 12% for single-family rehab programs; 17% for single-family housing development; 2% for homebuyer assistance programs; and 13% for program planning and administration.

Geographic Distribution

Target Area	Percentage of Funds
East St Louis	37.6
St. Clair County & City of Belleville	62.4
St. Clair County & City of Belleville (Area Benefit)	
East St Louis (Area Benefit)	
St. Clair County & City of Belleville (Low/Mod Income Household Benefit)	
East St Louis (Low/Mod Income Household Benefit)	

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

St. Clair County will administer CDBG funds on behalf of the Cities of Belleville and East St. Louis. Funds are allocated geographically to ensure that East St. Louis funds will be used only for activities conducted

within the boundaries of the City of East St. Louis.

Discussion

N/A

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

St. Clair County utilizes the HUD definition of HOME affordable housing established in 24CFR95.252 for rental housing and 24CFR92.254 for homeownership. These definitions are included in policies and procedures, which have been attached in the appendix.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	51
Special-Needs	5
Total	56

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	7
Rehab of Existing Units	32
Acquisition of Existing Units	0
Total	39

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Note: St. Clair County has annual CDBG and HOME allocations but does not receive ESG and HOPWA to directly address homeless and non-homeless special needs populations. Through the CoC program, rental/leasing assistance is provided for approximately 228 units and 442 beds. However, IGD Community Services only provides rental assistance through a public service project if an application is received from an organization desiring to provide such services to qualifying individuals and households.

AP-60 Public Housing – 91.220(h)

Introduction

SCCHA submitted to HUD’s Special Applications Center and received approval for an application to demolish the Adeline James Building (AJB), a thirty-two (32) unit senior building in Centreville (part of public housing development IL030-006), and five (5) family buildings in the Ernest Smith Sr. Apartments (ESSA), containing twenty (20) units, located on South 46th Street in Centreville (part of public housing development IL030-008). SCCHA also applied for and received fifty-two (52) Replacement Tenant Protection Vouchers (TPVs) to support the relocation of households displaced by the approved demolition action.

SCCHA submitted a second demolition application in January 2022 for one hundred two (102) family units in the ESSA development that are part of project 30-08. The application was approved, and resident relocation has been completed. SCCHA was eligible to apply for fifty-nine (59) TPVs and did so; however, due to limited funding, only thirty-three (33) TPVs were awarded in 2022. SCCHA was also eligible to apply for an additional twenty-six (26) TPVs in 2023 but did not do so because of long-term underutilization in the traditional Housing Choice Voucher Program. In January 2022, SCCHA also submitted an application for the conversion of forty-four (44) public housing units to Project-Based Vouchers and/or Project-Based Rental Assistance. The application included twenty (20) units in O’Fallon (30-24) and twenty-four (24) units in Lebanon (30-14), which are part of AMP 5. A CHAP (Commitment to Enter into a Housing Assistance Payments Contract) was executed, and SCCHA continued working toward closing. Although closing had originally been anticipated in 2023, delays extended the timeline. SCCHA completed the RAD closing in December 2025, and construction-related rehabilitation is now underway with completion anticipated by September 2026.

Additionally, consistent with HUD guidance and prior agency correspondence, SCCHA is in the preliminary planning phase of assessing the need for and feasibility of converting portions of, or potentially the full, public housing portfolio through the Rental Assistance Demonstration (RAD) program or other repositioning strategies, including mixed-finance and Low-Income Housing Tax Credit approaches, as appropriate. SCCHA and its Housing Development Partner will use the results of the comprehensive physical needs assessment, the Green Physical Needs Assessment (GPNA), and other relevant tools and information to inform these evaluations and any potential conversion or repositioning activity. SCCHA and its Housing Development Partner are also coordinating with the Illinois Housing Development Authority (IHDA) to develop a Community Revitalization Strategy for Cahokia Heights, which includes the communities formerly known as Cahokia, Centreville, and Alorton.

St. Clair County will continue to support public housing residents, subject to funding availability and competing priorities, by making grant assistance available for eligible needs such as rent, security deposits, utility costs, and related supportive services, and by supporting infrastructure and physical improvements to public housing units when resources are available.

St. Clair County is committed to ensuring that an appropriate support system is in place to assist residents during any agency-administered changes that may affect their housing. To promote housing

stability and continuity of assistance, SCCHA will work to provide timely communication, individualized relocation or transition support, referrals to supportive services, and coordination with community partners, as appropriate. SCCHA will make reasonable efforts to ensure that affected families are informed of available options and resources and are supported throughout any transition so that households maintain access to safe, decent, and secure housing.

Actions planned during the next year to address the needs to public housing

Enhance the availability of affordable housing by maximizing the effective use of existing resources through strategic maintenance and asset management practices designed to keep units in service and reduce vacancy turnaround time. SCCHA will continue efforts to sustain or expand lease-up rates in the Housing Choice Voucher program by implementing payment standards that support family access to rental housing throughout the jurisdiction. These efforts include ongoing outreach to property owners, particularly in areas with lower concentrations of low-income households, and consistent enforcement of family obligations for participating households to support landlord participation and program integrity. SCCHA will also continue to promote affordable housing options that meet a range of household sizes and will pursue opportunities to secure additional Housing Choice Vouchers for households with disabilities in coordination with community stakeholders.

SCCHA will continue to direct available assistance to families with incomes at or below 30 percent of Area Median Income (AMI), consistent with and, where feasible, exceeding applicable HUD income-targeting requirements for public housing and tenant-based Housing Choice Voucher programs. This objective may be supported through admissions preferences for households with the greatest economic need and through rent and occupancy policies that encourage employment and self-sufficiency opportunities for eligible families, while maintaining compliance with federal requirements.

In addition, SCCHA will continue to allocate available assistance to elderly households by designating certain public housing units for seniors age 62 and older, as appropriate. Assistance will also continue to be made available to non-elderly persons with disabilities through designated public housing units, as applicable. SCCHA will implement accessibility modifications in public housing identified through its Section 504 needs assessment and will continue outreach to local nonprofit organizations and service providers that support persons with disabilities.

SCCHA will continue to make effective use of Capital Fund Program resources by pursuing additional capital funding opportunities, when available; providing training and professional development for front-line and supervisory staff; and maintaining performance standards that support strong outcomes under HUD's public housing assessment framework. SCCHA will also continue to implement applicant screening and lease enforcement practices consistent with applicable requirements and will coordinate with law enforcement, resident organizations, and other partners to support safe public housing communities and appropriate service levels for public housing neighborhoods.

In 2021, SCCHA reduced its public housing inventory by fifty-two (52) units following the successful relocation of all affected households. In response to the reduction in available units, SCCHA has

expanded the use of Project-Based Vouchers throughout the community to support partners engaged in the development of affordable housing. These activities are consistent with the SCCHA Annual Plan objective of preserving existing affordable housing opportunities and encouraging the development of new units.

SCCHA has appointed a Housing Development Partner and is undertaking the renovation of properties in Lebanon and O'Fallon (Silver Creek Development) to support the long-term sustainability of its assisted housing portfolio. This effort includes the conversion of eligible public housing properties under the Rental Assistance Demonstration (RAD) program. RAD provides SCCHA with a mechanism to preserve and improve units while addressing significant deferred capital needs. Completion of this conversion process is anticipated by October 2026.

SCCHA will evaluate the thirty-two (32) scattered-site units located in the Village of Washington Park to assess the long-term viability of maintaining federally assisted housing at this location. As part of this review, SCCHA will consider factors including capital needs, infrastructure conditions, market conditions, neighborhood conditions, resident outcomes, and long-term program sustainability. The evaluation will help determine whether continued operation, rehabilitation, or repositioning of these units is the most appropriate course of action consistent with program goals and resident needs.

SCCHA will evaluate the long-term viability of the remaining portions of the ESSA development in Centreville (30-06 and 30-20) and intends to develop a repositioning strategy that supports the continued operation of these federally assisted rental units, if feasible. This assessment will consider the ongoing impact of storm and sanitary sewer system deficiencies that have resulted in recurring unit back-ups and related operational challenges. SCCHA intends to work with relevant stakeholders, including the City of Cahokia Heights, the Cahokia Heights Water and Sewer Department, St. Clair County, and state and federal partners, to identify a coordinated approach for infrastructure repair and improvement necessary to preserve the long-term viability of these units.

SCCHA intends to submit a RAD conversion application during the upcoming plan period for Hawthorne Terrace Apartments (44 units) in Cahokia Heights (formerly Alorton) to convert the property from public housing to a Project-Based Voucher funding platform. Additional RAD conversion applications may also be considered for other public housing properties. At this time, potential candidates for future RAD conversion include one or more properties within AMP 2 (Centreville and Alorton), AMP 4 (Belleville/Swansea), and AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt, and Duplo).

Consistent with prior discussion and HUD guidance, SCCHA will continue to evaluate the feasibility of repositioning some or all remaining public housing assets through the Rental Assistance Demonstration (RAD) program or other appropriate repositioning strategies.

St. Clair County will continue to support public housing residents, subject to funding availability and competing priorities, by making grant assistance available for eligible needs such as rent, security deposits, utility costs, and related supportive services, and by supporting infrastructure and physical improvements to public housing units when resources are available.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The majority of St. Clair County Housing Authority (SCCHA) public housing residents are represented by resident-elected Resident Councils. SCCHA provides financial support, technical assistance, and other in-kind support to these councils upon request and to the extent feasible. SCCHA also maintains a Resident Advisory Board to support the development and annual update of its Agency Plan.

SCCHA will continue to support Public Housing Resident Councils and the Resident Advisory Board.

SCCHA administers a Family Self-Sufficiency (FSS) Program that serves both public housing residents and Housing Choice Voucher participants. There are currently 42 families enrolled in the program, and many have identified homeownership as a long-term goal. The FSS Program Coordinator periodically schedules homebuyer counseling certification sessions for FSS participants. These sessions are also periodically made available to public housing residents and Housing Choice Voucher participants who are not enrolled in FSS through Family Resource Centers (a contracted service provider) and other community partners. SCCHA also tracks move-out reasons for public housing residents and Housing Choice Voucher participants. Based on available information, SCCHA estimates that up to 10 percent of households leaving these programs annually do so in order to purchase a home. St. Clair County also encourages residents who are prepared to transition to homeownership to use the County's Homebuyer Assistance Program.

SCCHA periodically shares homeownership information and sponsors first-time homebuyer training sessions in collaboration with SCC-IGD and other community organizations. Each year, some households exiting the public housing and Housing Choice Voucher programs report that they are leaving assistance in order to transition to homeownership.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

N/A

Discussion

N/A

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

In order to reduce and end homelessness through facilitating transitions to permanent housing and independent living, the CoC has established the following goals, which are supported by St. Clair County:

- Increasing the Supply of Affordable Housing
- Increase Economic Security of Households: Households are more stable when resources are in place to pay for basic necessities such as food, transportation, and medical care. Helping households increase income is critical for the homeless services system.
- Increase Homelessness Prevention Efforts: The CoC and the Housing Resource Center will support programs to prevent new individuals from becoming homeless, including individuals transitioning out of other systems (i.e. adult and juvenile justice systems, child welfare and foster care systems, behavioral and other health institutions).

In order to meet these goals, the CoC will undertake the following actions during this consolidated planning period, including during Program Year 2026:

- Align federal and local investment to meet the Permanent Supporting Housing inventory need for individuals and families who were formerly homeless or who have disabling conditions.
- Ensure there is an adequate supply of housing affordable at 30% of income for lower-income households to a range of income levels.
- Work with funders to ensure all new and turnover opportunities are filled via the Coordinated Assessment and Housing Program (CAHP) system.
- Develop common protocol to assist with the identification of individuals and families ready to “move on” from Permanent Supportive Housing.
- Increase access to housing opportunities by providing funding assistance to get in the door with help paying for security deposit/first month’s rent assistance.
- In Permanent Supportive Housing, the household pays no more than 30% of their income towards housing costs. To the extent that CoC can increase income, the homelessness system can serve more households and spread resources more broadly.
- Economic security is particularly important for households provided with Rapid Re-Housing assistance, a tool that moves persons experiencing homelessness more quickly into safe, stable housing, but is not intended to be a long-term affordable housing solution. To increase the success of families and individuals in the program, and to reduce the likelihood of a return to homelessness, the CoC and the Housing Resource Center will increase efforts to provide targeted employment assistance to these households both quickly and intentionally.
- Housing stability/Case Management – Time limited case management for helping people in the transition from emergency or transitional housing into permanent supportive housing to create additional stability. The HMIS system connects people with the resources and services they need

in Saint Clair County.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

In response to the challenges of tracking the homeless population, assessing their individual needs, and delivering appropriate services, St. Clair County Continuum of Care Program projects utilize a Homeless Management Information System (HMIS) for tracking population and services. Current and future anticipated needs include emergency shelter, transitional housing, permanent housing assistance and housing counseling. We currently chair the Point in Time Committee to coordinate Project Homeless Connect. This is a one-day event for both sheltered and unsheltered homeless to provide outreach and offers free services to the homeless (i.e. haircuts, vision screenings, immunizations, clothing giveaways along with many other services).

IGD's institutional structure also includes many formalized collaborations, the most active of which is the Homeless Action Council. IGD's Homeless Action Council partners are selected based on their capacity to provide services and outreach within St. Clair County.

Addressing the emergency shelter and transitional housing needs of homeless persons

IGD has established four priorities to respond to the needs of the homeless:

1. Continue IGD's relationship with the Homeless Action Council in coordinating efforts in streamlining service delivery to the homeless population of St. Clair County. These efforts include the establishment of a Coordinated Assessment and Intake facility and may include financial assistance.
2. Continue IGD's relationship with the Housing Resource Center. These efforts may include financial assistance.
3. Continue administration of and application for Continuum of Care Program projects.
4. Continue working with individual service providers in order to meet the needs of the County's homeless population.

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

In order to address the goal of meeting the emergency shelter and transitional housing needs of homeless persons, the St. Clair County CoC works with service providers and agencies to address the

individual needs of participants. While St. Clair County does not receive a direct allocation of ESG, the County coordinates closely with the CoC to ensure that goals, resources, and policies are aligned to most effectively address the needs of homeless persons, including facilitating their transition to PSH or RRH housing options if available. Specific actions that the CoC will undertake this year to meet these goals are:

- Work with the Housing Resource Center and Homeless Action Counsel in identifying needed resources for shelter and transitional housing participants.
- Provide training through the CoC to provide support to agency staff and shelter volunteers who work directly with homeless persons to assess their needs and facilitate access to the appropriate corresponding resources.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

IGD, along with the St. Clair County Continuum of Care developed performance and strategic planning objectives to increase progress toward ending Chronic Homelessness (CH) by increasing permanent supportive housing beds for chronically homeless persons. The two-year plan was established with five goals.

1. Reallocate twelve percent (12%) of transitional and permanent supportive housing (PSH) beds for Chronically Homeless individuals.
2. Each PSH project must prioritize twenty-five (25%) of PSH units for use by CH persons.
3. Partner with local units of government and public housing authorities to prioritize and set aside housing unit for CH persons.
4. Endorse the initiative to fund the National Housing Trust Fund to develop affordable housing units for CH persons.
5. Support additional local and state funding to develop affordable housing units for CH population.

St. Clair County is anticipating program changes with the release of the upcoming HUD NOFO that will lean towards rapid rehousing and transitional housing. These anticipated changes are driven by HUD's initiative to promote self-sufficiency.

The primary barrier to eliminating chronic homelessness is the general lack of funding resources available to the public and private agencies who serve the needs of the homeless. The level of federal funding has declined while neither state nor local funds have been able to fill the gap. In addition,

sometimes community resistance can hamper the creation, location or expansion of agencies serving the chronically homeless.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

IGD's homelessness prevention action steps for 2026 will be coordinated with the St. Clair County Continuum of Care and will likely be similar to the homelessness prevention action steps from previous years. It is expected that St. Clair County Continuum of Care organizations, working in concert, will:

- Work to coordinate prevention outreach to minimize duplication of effort and maximize the effective distribution of homeless prevention funds to needy individuals and families. In response to the challenges of tracking the homeless population and service delivery, IGD established the Homeless Action Council and developed the Homeless Management Information System (HMIS) for tracking population and services. All agencies receiving homeless prevention funds have access to the Homeless Management Information System (HMIS), to help identify persons in need and report on outcomes.
- Administer Rental Housing Support Program (RHSP) funds in order to provide rental subsidies to families who face imminent homelessness. This is the primary approach to combat homelessness among families with children.
- Leverage RHSP funds with other prevention services and funding. For example, the Low-Income Home Energy Assistance Program (LIHEAP) assists low-income households in paying home energy bills, to make housing temporarily more affordable. Community Services Block Grant (CSBG) funding provides rental, deposit, and mortgage assistance. A variety of private nonprofits provide prescription assistance, meal assistance, and utility assistance.
- Monitor client outcomes on a monthly basis to track the results of efforts.

With regards to individuals being discharged from publicly funded institutions and systems of care, each institution or system of care in St. Clair County follows the relevant state mandated discharge policy for the type of institution (foster care, health care, mental health care, corrections, etc.) This guarantees that any specialized discharge concerns for each particular institution are understood and that appropriate actions are taken. The discharge policies are similar to one another and are described in St. Clair County's Continuum of Care Strategic Plan. Discharge policies include strategies such as individualized post-discharge plans and case management services to ensure that persons being discharged from mental and physical health institutions are not routinely discharged into homelessness.

IGD, as a member of the Continuum of Care, has access to review each of these discharge policies. IGD

will continue to collect these discharge policies in a centralized location and will continue to work with service providers to coordinate efforts via the HMIS system and the Housing Resource Center and the Homeless Action Council.

Discussion

The County will continue to be an active participant in the St. Clair County Continuum of Care and will implement the following actions and activities outlined in the Continuum's Homeless Strategy to reach out to homeless persons and assess their individual needs:

- Work with homeless service providers and funders to ensure that local outreach efforts are culturally competent and designed to meet the needs of people with addictions and mental illnesses.
- Grow the Continuum of Care's Coordinated Entry process with a goal to develop interagency collaboration, partnerships and coordination of services to better serve homeless persons based on their individual needs.
- Work with homeless services providers to review restrictive program rules and make adjustments as appropriate to reduce barriers that keep people from obtaining and retaining permanent housing.
- Work with local municipalities as appropriate to advocate for solutions to critical issues that impact many homeless persons, such as affordable housing, local wages and public transportation.

In order to reduce and end homelessness through facilitating transitions to permanent housing and independent living, the CoC has established the following goals, which are supported by St. Clair County:

- Increasing the Supply of Affordable Housing
- Increase Economic Security of Households: Households are more stable when resources are in place to pay for basic necessities such as food, transportation, and medical care. Helping households increase income is critical for the homeless services system.
- Increase Homelessness Prevention Efforts: The CoC and the Housing Resource Center will support programs to prevent new individuals from becoming homeless, including individuals transitioning out of other systems (i.e. adult and juvenile justice systems, child welfare and foster care systems, behavioral and other health institutions).

Note that St. Clair County does not receive an ESG allocation to specifically address homeless needs.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

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

Additionally, substantial portions of the American Bottom area of Southwestern Illinois is designated a Special Flood Hazard Area (SFHA). The Southwestern Illinois Flood Prevention District Council (FPD Council), which includes Madison, Monroe and St. Clair counties, created independent Flood Prevention Districts (FPDs). The FPD Council was formed by the three county FPDs as a joint venture to protect the lives, property and the economic vitality of the St. Louis Metro East region.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

IGD will provide down payment and closing cost assistance to low-income buyers. It will also continue to work with a consortium of banks known as the Metro-East Lending Group, which has increased the availability of home financing, particularly in the American Bottoms area, through education and product expansion.

IGD is also committed to ensuring that the affordable housing (and market-rate housing) that is available throughout St. Clair County is available to persons and families regardless of their race, color, national origin, religion, gender, familial status or disability.

St. Clair County follows policies and procedures that promote housing by ensuring outreach to all potentially eligible households, especially those least likely to apply for assistance. The County markets all programs, including housing rehabilitation and down payment assistance, in a manner consistent with the law.

Discussion: N/A

AP-85 Other Actions – 91.220(k)

Introduction:

N/A

Actions planned to address obstacles to meeting underserved needs

The following actions are planned in program year 2026 to address obstacles to meeting underserved needs:

- St. Clair County will require homebuyer counseling for down payment and closing cost assistance to low- and moderate-income homebuyers to overcome obstacles to becoming new homeowners. Comprehensive housing counseling services may be offered to the near-homeless, homeless and chronically homeless to prevent homelessness and to build self-sufficiency for those who are already homeless. Wherever possible, the County will attempt to attract additional sources of funding to support these efforts.
- Home repair, emergency home repair assistance and home accessibility improvements will be offered to low- and moderate-income homeowners to help sustain them in their homes.
- IGD will seek to leverage funds wherever possible to make affordable housing development more financially feasible in underserved communities. IGD will also provide infrastructure improvements that help overcome some of the obstacles to making these areas more viable.
- IGD will continue to communicate with local financial institutions to raise their awareness of the state and local programs that are available to businesses that locate in a tax increment financing district, a state enterprise zone or a rural area, which may make it possible to offer loans to businesses in low-income areas.

Further, St. Clair County follows policies and procedures that promote affordable housing by ensuring outreach to all potentially eligible households, especially those least likely to apply for assistance. These policies and procedures are designed to ensure that the owners of properties assisted with community development funds employ marketing plans that provide information and otherwise attract eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status (persons with children under 18 years of age, including pregnant women) or disability, and also to persons with special needs. The County markets all programs, including housing rehabilitation and down payment assistance, in a manner consistent with the law.

To encourage equal opportunity, the Community Development Group of IGD currently has a list of approved minority and women-owned businesses (MBEs and WBEs). The Group conducts an annual update of MBE/WBE lists from the Illinois Department of Transportation (IDOT) and Central Management Services (CMS). It also conducts an annual review of the MBE list to confirm contact information and the status of each business. CHDO, Housing Rehabilitation, and New Construction contracts all have language that encourages the use of MBE/WBE contractors in compliance with

Federal, State, and Local laws.

Actions planned to foster and maintain affordable housing

IGD will provide down payment and closing cost assistance to low-income buyers. We will work with a consortium of banks known as the Metro-East Lending Group, which has increased the availability of home financing, particularly in the American Bottoms area, through education and product expansion. We will provide loans and forgivable loans to homeowners to make repairs to their homes; to make accessibility improvement to homes with disabled persons present, to remediate lead contamination in homes, and to make emergency home repairs.

Actions planned to reduce lead-based paint hazards

IGD will provide loans and forgivable loans to homeowners to remediate lead contamination in homes.

Actions planned to reduce the number of poverty-level families

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

During the 2026 Program Year, St. Clair County will undertake several initiatives that are consistent with the long-term approach to reducing poverty levels. The county will continue to coordinate with agencies to provide various public service activities. CDBG and HOME funded activities will assist lower income persons through such activities as home repair, homeownership assistance, public facilities and infrastructure improvements, and a senior/disabled person home accessibility improvement program. These activities benefit lower income persons and serve to improve their economic status and well-being.

Actions planned to develop institutional structure

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

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

Block Grant Programs more efficiently.

Actions planned to enhance coordination between public and private housing and social service agencies

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

In the coming year, IGD will continue to provide staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC). The Housing Resource Center (HRC) also operates under the IGD umbrella. It will continue to operate Continuum of Care Programs for the homeless and near homeless, as well as coordinate other housing counseling and education efforts.

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

IGD's Employment and Training (ET) Group will coordinate the Workforce Innovation & Opportunity Act (WIOA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties. Local Workforce Innovation Area (LWIA) #24 will provide employment and training services through the Mid-America Workforce Investment Board, comprised of businesses, economic development, education, labor

and community-based organizations, and partners in local One-Stop Centers.

Discussion:

Obstacles that will be addressed by the above to meet underserved needs include:

- Lack of affordable, decent housing
- High number of poverty-level families
- Lack of funding (IGD will attempt to reduce this by applying for multiple sources of funding)
- Lack of access to information about programs and services (IGD will engage in targeted marketing to address this obstacle)

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The St. Clair County Housing Rehabilitation Programs provide financial assistance to eligible homeowners to improve the safety, accessibility, and livability of their homes. These programs are funded in part by the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) Program (24 CFR Part 570) and the HOME Investment Partnerships Program (24 CFR Part 92). The application process is determined on a yearly basis, and may involve a lottery drawing, targeted area selection, or alternative application methods depending on community needs and available funding. A complete copy of the CDBG and HOME policies and procedures may be accessed on the St. Clair County Intergovernmental Grants website:

<https://www.co.st-clair.il.us/departments/intergovernmental-grants/community-development>

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that it will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Along with CDBG and HOME funds, St. Clair County expects to make Community Services Block Grant, Low Income Home Energy Assistance Program, Workforce Innovation & Opportunity Act, McKinney- Vento Homeless Assistance Act, Illinois Housing Development Authority Trust Funds, Federal Home Loan Bank funds, Affordable Housing Program funds, Low-Income Housing Tax Credits (if successful applications are made), and Section 8 Housing Choice Vouchers available to address the needs identified in its strategic plan. The County continues to apply for additional grants from the public and private sectors for additional leverage resources to carry out the activities in this Consolidated Plan. In addition to the HOME Annual Allocation and Prior Year HOME funds totaling \$1,729,814.03.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The County uses HOME funds to provide homeownership assistance to eligible homebuyers and to provide development gap financing to developers of homes that are sold to income-eligible homebuyers. In accordance with 24 CFR Part 92.254(a)(2)(iii), the County uses the HOME affordable homeownership limits provided by HUD which is \$218,000 for a single-family home for St. Clair County. The forms of subsidy that are used to assist homebuyers and/or developers include homebuyer down payment assistance, homebuyer purchase price assistance, and development cost subsidy. When the County provides HOME development cost subsidies to developers it always couples it with HOME-funded homeownership assistance to the purchasers of the homes. HOME recapture provisions are used in all cases. The County does not use resale provisions.

The County recaptures HOME funds when it provides HOME-funded homeownership assistance (and when it couples HOME-funded homeownership assistance with HOME-funded development gap financing to a developer) when a HOME-assisted homebuyer sells or transfers their home before the HOME affordability period expires or when there is a foreclosure in process on a home purchased with HOME-funded homeownership assistance that results in either a voluntary ("short sale") or involuntary (completed foreclosure) before the HOME affordability period expires.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

TABLE 1 TO PARAGRAPH (a)(4)

Homeownership assistance HOME amount per-unit	Minimum period of affordability in years
Under \$25,000	5
\$25,000 to \$50,000	10
Over \$50,000	15

Consistent with 24 CFR 92.254(a)(4), the County enforces the following minimum periods of affordability in accordance with the table above: The total amount of HOME funds used to provide homeownership assistance to the homebuyer is used for purposes of determining the length of the period of affordability.

Recapture Provisions:

Consistent with 24 CFR 92.254(a)(5)(ii), The County's recapture provisions allow it to recapture the entire HOME subsidy that was provided to the homebuyer, limited to the total net proceeds of the sale (whether voluntary or involuntary), if the HOME assisted property is sold or transferred before the expiration of the HOME affordability period, regardless of whether the sale price would be considered "affordable" under the HOME Program or whether the buyer meets the HOME income guidelines.

The County will also recapture HOME funds when there are net proceeds from a sale triggered by a pending foreclosure (a "short sale") or from the sale of a foreclosed property. In these circumstances the County will recapture all or a portion of the HOME subsidy that was provided to the homebuyer up to the total net proceeds remaining after the sale or transfer. Net proceeds are calculated as the sales price, minus the priority mortgage loan repayment (other than HOME funds), and any closing costs.

All HOME-assisted unit sales or transfers under the County's HOME recapture provisions will meet

the following criteria:

- The HOME-assisted homebuyer may sell or transfer the property to any willing buyer.
- The sale or transfer of the property during the period of affordability triggers the repayment to the County of the HOME affordability assistance that the HOME-assisted homebuyer received when he/she originally purchased the home, limited to the net proceeds of the sale.

These recapture provisions are enforced through a mortgage, note and Recapture Agreement filed with the St. Clair County Recorder of Deeds. Upon receipt of recaptured funds, the County will file a "Release" document with the St. Clair County Recorder of Deeds to release the original HOME-assisted homebuyer from the requirements of the mortgage, note and Recapture Agreement. Recaptured funds are paid to the County and used only for HOME-eligible activities.

Resale Provisions:

The County does not use resale provisions in its HOME Program. Whenever HOME subsidy is provided in the form of a development subsidy the County also provides homeownership assistance to the purchasers of the homes with HOME funds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

St. Clair County does not plan to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.