

October 1, 2025—September 30, 2029  
and  
Program Year 2025 Annual Action Plan

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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St. Clair County Intergovernmental Grants Department

Consolidated Plan

ST. CLAIR COUNTY

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## **Executive Summary**

### **ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

For over 40 years the U.S. Department of Housing and Urban Development (HUD) has provided annual entitlement funding support to urban counties and cities with populations over 50,000 for housing and community development purposes. The amount of funding awarded is based on formulas that measure the level of need in each community and take into account such factors as population, poverty, housing overcrowding/age, and growth lag. Funding is to be used in the implementation of a multi-year housing and community development strategy and annual action plans known collectively as the Consolidated Plan.

This Consolidated Plan guides the use of federal funds granted to St. Clair County, the City of East St. Louis and the City of Belleville under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. It covers the five program years beginning October 1, 2025 through September 30, 2029. Programs and activities described in this plan are intended to primarily benefit low-income and moderate-income residents of St. Clair County, areas with majority low- and moderate-income populations, other county residents and areas through the prevention and/or elimination of slums and blight, and the County as a whole. Funds are used for activities that are eligible throughout St. Clair County. The County also uses this plan to coordinate with other federal and state grant programs and local initiatives.

#### **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

Infrastructure improvements and housing will remain the primary focus of the CDBG program and maintaining single-family homeownership housing will remain the focus of the HOME program. These priority objectives were identified through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.

In addition to using the limited amounts of CDBG and HOME funds available, St. Clair County will continue to use other federal, state and local economic development incentives, including Tax Increment Financing, Enterprise Zones, and a variety of state and federal tax credits, for economic and residential development purposes.

St. Clair County will administer CDBG funds on behalf of the Cities of Belleville and East St. Louis.

Identified outcomes include the following:

- Development of 5 single-family affordable for-sale homes
- Provision of direct financial assistance to 17 homebuyers
- Rehabilitation of 39 low-to-moderate income single-family homes
- Improvements to 14 public facilities

### **3. Evaluation of past performance**

St. Clair County has a long history of effectively administering the programs included in the Consolidated Plan. In program year 2023 (the most recent program year completed), St. Clair County has met or is on track to meet or exceed its Consolidated Plan goals in the following areas:

- **Public Services:** The County's goal for public services in East St. Louis in PY 2020-2024 was to complete 18 activities, and in PY 2023, one (1) public service activity was completed, although there was no goal for Public Services in the PY 2023 Annual Plan and the completed program utilized CDBG-CV funds. With this program reaching completion in 2023, we have met 89% of our five-year Consolidated Plan goal of 18 activities.
- **Public Facilities and Infrastructure Improvements:** The County's PY 2020-2024 goal for public facilities and improvements was to complete 80 projects. In PY 2023, nineteen (19) public facilities and improvement projects in predominantly low-moderate income areas funded with CDBG were completed, representing 100% of the annual goal. The County entered its final year in the five-year Consolidated Plan cycle, having met 91% of the Strategic Plan goal.
- **Housing Rehabilitation:** The County's PY 2020-2024 goal for single-family rehab was to complete 92 projects and in PY2023, we completed 20 projects, falling short of our annual goal of 37 projects. Another 15 projects were underway as of the end of the 2023 program year, boosting the rate of achievement for this goal from 54% to 95% upon their completion.
- **Homebuyer Down Payment Assistance:** The County's PY 2020-2024 homebuyer assistance goal was to provide assistance to 90 low-moderate homebuyers. In PY 2023, we assisted fifteen (15) homebuyers, which is 115% of our annual goal and 77% of our five-year goal. Three (3) projects remained open at the end of PY 2023.

- Affordable Housing Development: The County set a goal of 8 affordable homes to be developed with HOME assistance in PY 2023. Two (2) homes have been completed, all of them by CHDOs (100%), and four additional homes are underway (by a CHDO), but not yet completed as of the end of the program year. The County's five-year goal for single-family housing development was 15 homes completed, so the County is on track to meet this five-year goal through activities completed in the final program year of the five-year cycle.

#### **4. Summary of citizen participation process and consultation process**

This plan is the product of extensive public outreach, multiple public hearings, and consultation with a number 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 people, people with disabilities and homeless people.

St. Clair County conducted a needs assessment survey to gather citizen input into what the County's priority needs are.

The first round of public hearings was held on the following dates and times at the locations listed:

- February 11, 2025, 10:00 AM at Millstadt Village Hall
- February 11, 2025 at 1:30 PM at Village of Cahokia Heights
- February 12, 2025 at 10:00 AM at Village of Freeburg
- February 12, 2025 at 1:30 PM at St. Clair County Intergovernmental Grants Department
- February 13, 2025 at 10:00 AM at Village of Fairmont City
- February 13, 2025 at 1:30 PM at Village of Marissa

The second round of public hearings was held on the following dates and times at the locations listed:

- May 12, 2025, 6:00 PM at St. Clair County Intergovernmental Grants Department
- May 13, 2025, 10:00 AM at Village of Fairmont City
- May 13, 2025, 1:30 PM at Village of Marissa
- May 14, 2025, 10:00 AM at Village of Freeburg
- May 15, 2025, 10:00 AM at Village of Millstadt

A complete draft of this plan was made available for public review and comment for a 30-day period beginning May 12, 2025 and ending on June 16, 2025. 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: ([www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx](http://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 will also be made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

## **5. Summary of public comments**

There were no public comments received at the first or second round of public hearings.

## **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 round of Public Hearings for consideration in the development of the 2020—2024 Consolidated 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 2024 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.

Infrastructure improvements and housing will remain a primary focus of the CDBG program and maintaining single-family homeownership housing will remain the focus of the HOME program.

In addition to using the limited amounts of funds available from HUD for these purposes, the County will continue to use other federal, state and local community and economic development incentives, including when available, tax increment financing and a variety of state and federal tax credits.

St. Clair County plans to use \$3,675,907 in CDBG funds that it projects will be available in Program Year 2025 to fund capital improvements, housing development grants and loans, owner-occupied home rehabilitation grants and loans, and for program planning and administration; and \$1,147,896.86 in HOME funds that it projects will be available in Program Year 2025 to fund owner-occupied home rehabilitation grants and loans, homebuyer assistance, and the construction of new affordable single-family homes.

	CDBG	HOME	TOTAL
Estimated Annual Entitlement	\$3,438,146.00	\$ 787,896.86	\$4,226,042.86
Estimated Program Income	\$0.00	\$0.00	\$0.00
Prior Year Funds	\$237,761.00	\$ 360,000.00	\$597,761.00
Estimated Annual Funds Available Year 1	\$3,675,907.00	\$ 1,147,896.86	\$4,823,803.86
<b>5-Year Total Estimated Funds Available</b>	<b>\$18,379,535.00</b>	<b>\$5,739,484.30</b>	<b>\$24,119,019.30</b>

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities 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.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

N/A

**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)).**

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, 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.

**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 continue to provide staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in the implementation of the ten-year plan to end homelessness. The Housing Resource Center (HRC) also operates under the IGD umbrella. HRC will continue to operate Continuum of Care Programs for the homeless and near homeless and administer other housing and education efforts. IGD also offers housing counseling and education throughout St. Clair County.

IGD will also continue to provide a meeting place and clerical services for the Community Action Agency Advisory Board. (CAA Board). The IGD Director serves as staff to the advisory board. Through IGD’s Community Services Group St. Clair County 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, weatherization, information, and referrals.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the 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 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.

Further, 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
- Lessie Bates-Davis Neighborhood House
- St. Clair County Housing Authority
- Call for Help
- Homeless Action Council
- Programs and Services for Older Persons

- Living Independently Now Center (LINC), Inc.
- Court Appointed Special Advocate (CASA)
- Division of Employment Security One-Stop Centers

IGD's Employment and Training (ET) Group will coordinate the Workforce Innovation & Opportunity Act (WIOA) Program in St. Clair County. 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. 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 (ORS)
- Illinois Department of Employment Security
- Members of local businesses that represent local hiring opportunities, which make up a majority of the Workforce Investment Board

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	St. Clair County Intergovernmental Grants
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
2	<b>Agency/Group/Organization</b>	Homeless Action Council Continuum of Care
	<b>Agency/Group/Organization Type</b>	Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.

3	<b>Agency/Group/Organization</b>	Community Action Agency
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
4	<b>Agency/Group/Organization</b>	Mid America Workforce Investment Board
	<b>Agency/Group/Organization Type</b>	Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
5	<b>Agency/Group/Organization</b>	St. Clair County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
6	<b>Agency/Group/Organization</b>	St. Clair County Emergency Management Agency
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband/Hazard Mitigation/Public Health

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local agencies to administer programs
7	<b>Agency/Group/Organization</b>	St. Clair County Health Department
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	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
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
8	<b>Agency/Group/Organization</b>	Lessie Bates Davis Neighborhood House
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Health Services-Education Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Youth, Education, and Food Access Services
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with local partners to administer programs.
9	<b>Agency/Group/Organization</b>	ILLINOIS DEPARTMENT OF HUMAN SERVICES
	<b>Agency/Group/Organization Type</b>	Other government - State

	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
10	<b>Agency/Group/Organization</b>	CATHOLIC URBAN PROGRAMS
	<b>Agency/Group/Organization Type</b>	Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Home Repair
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with local partners to administer programs.
11	<b>Agency/Group/Organization</b>	CALL FOR HELP, INC.
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with local partners to administer programs.
12	<b>Agency/Group/Organization</b>	Programs and Services for Older Persons
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Elderly Housing and Services

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local service organizations to administer programs
13	<b>Agency/Group/Organization</b>	Living Independently Now Center (LINC), Inc.
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing and services for persons with disabilities
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local service organizations to administer programs
14	<b>Agency/Group/Organization</b>	Court Appointed Special Advocates
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local governments to administer programs.
15	<b>Agency/Group/Organization</b>	Illinois Department of Employment Security
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	IGD coordinates with state and local service organizations to administer programs

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

N/A

**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	Homeless Action Council	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) in the implementation of the ten-year plan 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, and administer other housing counseling and education efforts. IGD also offers housing counseling and education throughout St. Clair County. 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 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.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

IGD coordinates with state and local governments to administer programs such as 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.



**Narrative (optional):**

St. Clair County has consulted with the St. Clair County EMA for both broadband access and hazard mitigation. St. Clair County Health Department has provided consultation for hazard mitigation. Both agencies have information accessible on the County website as well. The County has consulted and continues to work with DCEO in providing broadband service to lower income areas of the County. Along with DCEO, the County has consulted with several broadband service providers (those providers are ATT and Spectrum, and Clearwave Communications these are the largest providers). St. Clair County consults with the Southwestern Illinois Flood Prevention District Council regarding flood plain management on a regular basis.

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

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 people, people with disabilities and homeless people.

Eleven public meetings, a comprehensive needs assessment survey, and a budget exercise survey were all conducted in advance of producing a draft Consolidated Plan so that the results of the citizen participation process could directly guide goal setting.

Public hearings were held on the following dates and times at the locations listed:

- February 11, 2025, 10:00 AM at Millstadt Village Hall
- February 11, 2025 at 1:30 PM at Village of Cahokia Heights
- February 12, 2025 at 10:00 AM at Village of Freeburg
- February 12, 2025 at 1:30 PM at St. Clair County Intergovernmental Grants Department
- February 13, 2025 at 10:00 AM at Village of Fairmont City
- February 13, 2025 at 1:30 PM at Village of Marissa
  
- May 12, 2025, 6:00 PM at St. Clair County Intergovernmental Grants Department
- May 13, 2025, 10:00 AM at Village of Fairmont City
- May 13, 2025, 1:30 PM at Village of Marissa
- May 14, 2025, 10:00 AM at Village of Freeburg
- May 15, 2025, 10:00 AM at Village of Millstadt

A complete draft of the plan was made available for public review and comment for a 30-day period beginning May 12, 2025 and ending on June 16, 2025. The availability of both the draft plan and the final plan was advertised in the local newspaper and the complete documents were available for review on the County's website at [www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx](http://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 was also made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

Summaries of the 5 public hearings held throughout the planning process, including public comments, are included as an attachment to this Consolidated Plan.

On April 27, 2025 the County advertised the proposed 2025-2029 Consolidated Plan for citizen review and comment in the Bellevue News Democrat.

#### 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)
1	Public Hearing	Non-targeted/ broad community	Summaries of the 11 public hearings held throughout the planning process are included as an attachment to this Consolidated Plan.	There were no comments received.	There were no views or comments not accepted for consideration in the development of the 2025-2029 Consolidated Plan.	
2	Newspaper Ad	Non-targeted/ broad community	The availability of the Draft 2025-2029 Consolidated Plan was advertised in the local newspaper.	The availability of the Draft 2025-2029 Consolidated Plan was advertised in the local newspaper. There were no comments received.	There were no views or comments not accepted for consideration in the development of the 2025-2029 Consolidated Plan.	

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)
3	Internet Outreach	Non-targeted/broad community	Complete Draft and Final Consolidated Plan documents were available for review on the County's website at <a href="http://www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx">www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx</a> . There were no comments received.	Complete and Final Consolidated Plan documents were available for review on the County's website at <a href="http://www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx">www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx</a> . There were no comments received.	There were no views or comments not accepted for consideration in the development of the 2025-2029 Consolidated Plan.	<a href="http://www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx">www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx</a>
4	Survey	Non-targeted/broad community	54 unique respondents participated in the survey	Summaries of the comments received on the survey are included as an attachment to this Consolidated Plan.	There were no views or comments not accepted for consideration in the development of the 2025-2029 Consolidated Plan.	

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

St. Clair County is located along the Mississippi River in southwestern Illinois. It is one of two urban counties that are part of the Metropolitan Area. The County includes every conceivable land use, ranging from agricultural to suburban to urban. This Plan covers the entire County, including the City of Belleville and City of East St. Louis entitlement communities, with the exception of Scott Air Force Base and the cities of Madison and Collinsville, each of which is located partially in Madison County and partially in St. Clair County. Both elected to be served by Madison County and are not covered in this Plan.

There are sharp contrasts in the economic status of St. Clair County residents. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while those on the bluffs have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

The American Bottoms communities have become economically distressed over the past 60 years as more affluent residents moved from the bottoms to the bluffs and to nearby Missouri communities. The African American population is mostly concentrated in the American Bottoms in and around and collar communities. This is one of the largest minority concentrations in the State of Illinois. This area has been significantly affected by the exodus of many middle-class and affluent minority households migrating to formerly all-white or majority-white suburban communities. Consequently, the bottom communities suffer from disinvestment, few economic opportunities, a disproportionate number of poor residents and a housing stock that has increasingly become housing of last resort. As has been the case in similar situations across the nation, the disinvestment has also resulted in a lack of resources in affected school districts and a decline in positive perceptions of the affected communities.

Many figures presented in this consolidated plan are represented as a percentage of the HUD Area Median Family Income (HAMFI) for the St. Louis metropolitan area. It is done so that local market realities of affordability are applied instead of state or national median incomes.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	256,258	252,865	-1%
Households	98,409	101,920	4%
Median Income	\$49,895	\$57,473	15%

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	18,933	14,434	18,605	10,234	39,625
Small Family Households	5,504	4,806	6,078	4,199	21,489
Large Family Households	932	616	1,603	1,008	3,080
Household contains at least one person 62-74 years of age	3,474	3,409	4,940	2,453	9,870
Household contains at least one person aged 75 or older	3,156	2,666	2,327	955	2,748
Households with one or more children 6 years old or younger	3,506	2,086	2,390	1,873	3,567

**Table 6 - Total Households Table**

**Data Source:** 2016-2020 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	320	165	0	4	489	68	49	40	65	222
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	350	50	59	15	474	0	4	4	14	22
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	269	159	25	100	553	63	10	28	65	166
Housing cost burden greater than 50% of income (and none of the above problems)	6,535	653	20	0	7,208	3,727	917	369	5,062	5,755
Housing cost burden greater than 30% of income (and none of the above problems)	1,816	3,530	1,472	109	6,927	1,360	2,238	2,483	593	6,644
Zero/negative Income (and none of the above problems)	1,092	0	0	0	1,092	632	0	0	0	632

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**Table 7 – Housing Problems Table**

Data 2016-2012 CHAS  
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	7,480	1,019	104	119	8,722	3,863	989	436	193	5,481
Having none of four housing problems	4,887	6,105	6,321	2,860	20,173	2,728	6,308	11,729	7,164	27,929

**Table 8 – Housing Problems 2**

Data 2016-2020 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	2,876	1,898	559	5,333	1,273	951	903	3,127
Large Related	597	184	145	926	204	138	203	545
Elderly	1,964	926	233	3,123	2,652	1,487	955	5,094
Other	3,524	1,436	538	5,498	1,082	623	763	2,468
Total need by income	8,961	4,444	1,475	14,880	5,211	3,199	2,824	11,234

**Table 9 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:



#### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	262	262	906	211	0	1,117
Large Related	0	0	50	50	100	4	15	119
Elderly	1,390	215	10	1,615	1,835	458	174	2,467
Other	0	2,950	198	3,148	1,005	0	0	1,005
Total need by income	1,390	3,165	520	5,075	3,846	673	189	4,708

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS  
Source:

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	390	189	29	115	723	43	14	18	45	120
Multiple, unrelated family households	205	20	10	0	235	20	0	14	30	64
Other, non-family households	24	0	45	0	69	0	0	0	4	4
Total need by income	619	209	84	115	1,027	63	14	31	79	188

Table 11 – Crowding Information – 1/2

Data 2016-2020 CHAS  
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	2,245	1,155	1,105	4,505	545	675	1,145	2,365

**Table 12 – Crowding Information – 2/2**

**Alternate Data Source Name:**

2017-2021 CHAS

**Data Source Comments:**

### **Describe the number and type of single-person households in need of housing assistance.**

The Economic and Market Analysis Division of the US Department of Housing and Urban Development makes Special Tabulations of American Community Survey data, including the presence of housing problems based on household size, available at <http://www.huduser.org/portal/ast/index.htm> at the County level. The most recent available data is based on the 5-year 2023 American Community Survey. In St. Clair County, there are 32,352 single-person households and 16,740 of these households experience housing cost burden. This represents approximately 45.7% of single-person households that are in need of some sort of housing assistance.

### **Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

The number of St. Clair County families who are victims of domestic violence, dating violence, sexual assault and stalking is unknown. However, some measures are available via the Continuum of Care and the Uniform Crime Reporting program that help shed light on the question. The St. Clair County Continuum of Care Homeless Point in Time Count for January 23, 2025 identified 18 homeless adult victims of domestic violence - 12 sheltered and 6 unsheltered - although it is important to note that tracking and establishing a reliable count of the homeless population is extremely difficult and there is widespread agreement that Point In Time counts underreport the true measure of need in a community. The Crime in Illinois 2024 Annual Uniform Crime Report from the Illinois State Police shows 70 documented forcible rapes in 2024 and 90 documented forcible rapes in 2023 (a 22% decrease) for St. Clair County. The same report shows 1,165 documented domestic-related offenses in 2017 and 1,101 documented domestic-related offenses in 2023 (a 6% increase) for St. Clair County.

### **What are the most common housing problems?**

Key housing problems include high housing cost burden and occasionally poor housing quality/safety. HUD defines a household as being housing cost burdened if rent or home ownership costs are over 30% of a household's income. Housing cost burden can theoretically be solved through either lower rent/mortgage costs (via affordable housing development or housing vouchers) or higher household incomes (via, for example, job training services). In St. Clair County, households of all types (small related, large related, elderly, other) experience housing cost burden. According to the 2023 American Community Survey 5-year estimates (DP04), in St. Clair County an estimated 47% of renter households and 17.9% of owner households face housing cost burden. Housing quality/safety can sometimes become an issue when households do not have the funds necessary to complete needed home repairs.

### **Are any populations/household types more affected than others by these problems?**

Housing Cost Burden is a measure of affordability that takes into account both household income and the rent or home ownership costs of housing. Therefore, lower income households tend to experience housing cost burden more frequently. In St. Clair County, approximately 75% of all extremely low-income households (less than 30% AMI), or 14,172 (of 18,933) households, are housing cost burdened or severely housing cost burdened (according to the 2016-2020 CHAS selected data summary for St. Clair County). In addition, Sections NA-15 through NA-30 of this document detail proportionately greater needs than the income category as a whole.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Extremely low-income households generally face two key challenges: the challenge of finding quality affordable housing and the challenge of finding appropriate supportive services.

### **Housing Needs**

To meet affordable housing needs, St. Clair County plans to continue using a portion of the St. Clair County, City of Belleville and City of East St. Louis CDBG funding to provide loans and grants to owner-occupants for home repairs (including emergency home repairs) and home improvements (including accessibility improvements).

All eligible persons (i.e. elderly, special needs, homeless, small families and large families) throughout St. Clair County may seek assistance for any of the above- mentioned programs.

### **Supportive Service Needs**

Although extremely low-income households are generally not homeless, they do require some of the same sorts of supportive services that IGD coordinates through the Housing Resource Center, the Homeless Action Council, and the St. Clair County Continuum of Care. Specifically, the following supportive service strategies will be of benefit to non-homeless households:

- Continue to maintain and utilize the Homeless Management Information System (HMIS) for tracking population and services, minimizing duplication of effort, and maximizing the distribution of homeless prevention funds to needy individuals and families. Despite the name, the HMIS tracks supportive services received by non-homeless persons and households who may be at risk for homelessness due to extenuating circumstances, such as disability, domestic violence, or substance abuse.
- Administer Low-Income Home Energy Assistance Program (LIHEAP) funding to assist low income households in paying home energy bills, in order to make housing temporarily more affordable.
- Utilize Community Services Block Grant (CSBG) funding to provide rental, deposit, and mortgage assistance.
- Partner with private nonprofits through the Housing Resource Center and the Homeless Action Council to connect special needs population with services such as prescription assistance, meal assistance, and short term specialized care.

Coordinate with the Veteran's Assistance Center to refer clients, allowing them access to services offered by each agency.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

While the full extent of the at-risk population is unknown, St. Clair County's Homeless Management Information System (HMIS) helps track data on persons who are either homeless or at imminent risk of becoming homeless. Households at risk of becoming homeless include (but are not limited to) households staying with a family or friend temporarily or households currently housed but without a source of income.

### **Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Reasons for the increasing homeless population include job losses from the declining economy and the increase in the cost of living. Household expenses have increased in the areas of food, rent, fuel, utilities, education, medical, etc. The current economy has created over-crowded conditions in existing shelters and a devastating impact on the quality of outreach and assessment services provided by local service providers. The overcrowded conditions in the shelters leave no room for the families that are homeless. As shown in a survey of social service agencies and governments in St. Clair County, other groups were identified as having homeless segments. Additionally, many of the clients of Chestnut Health Systems are homeless.

### **Discussion**

The following are the Jurisdiction's definition for "standard condition," "substandard condition" and "substandard condition but suitable for rehabilitation:"

Standard Condition is one that the premises does not pose a risk to the health, life or safety of any actual or potential occupants and only contains minimal code violations according to St. Clair County Housing Maintenance Standards.

A substandard condition exists when the conditions of the premises are such that they pose a risk to the health, life, or safety of any actual or potential occupants. Such conditions include multiple code violations, some of which may be significant. These may include such issues as severe structural problems, lack of water, heat, or electricity, lead-based paint hazards, significantly leaking roofs, collapsed sewer laterals, as well as any other conditions that adversely affect any occupants.

A building that is substandard but suitable for rehabilitation is one that, while the premises may pose a risk to the health, life or safety of any actual or potential occupants, and contain multiple code violations, the structural integrity of the building is intact and can be repaired and all code violations and hazards can be remedied.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

A disproportionately greater need exists when the members of racial or ethnic group at an income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

As an example, assume that 60% of all low-income households within a jurisdiction have a housing problem and 70% of low-income Hispanic households have a housing problem. In this case, low-income Hispanic households have a disproportionately greater need. The percent of households with a housing problem is calculated by taking the HUD CHAS data from the tables below and dividing the number of households with a housing problem by the total of households with a housing problem and those without a housing problem.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	14,725	4,506
White	5,532	1,760
Black / African American	8,189	2,544
Asian	139	15
American Indian, Alaska Native	30	0
Pacific Islander	0	0
Hispanic	562	154

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

0-30% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	76.57%
White	75.86%
Black / African American	76.30%
Asian	90.26%
American Indian, Alaska Native	100.00%
Pacific Islander	0.00%
Hispanic	78.49%

**0%-30% AMI: Percent with Housing Problems**

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	8,064	6,729
White	4,110	3,850
Black / African American	3,580	2,653
Asian	83	20
American Indian, Alaska Native	19	4
Pacific Islander	0	0
Hispanic	219	133

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30-50% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	54.51%
White	51.63%
Black / African American	57.44%
Asian	80.58%
American Indian, Alaska Native	82.61%
Pacific Islander	0.00%
Hispanic	62.22%

**30%-50% AMI: Percent with Housing Problems**

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,574	14,359	0
White	2,748	9,666	0
Black / African American	1,556	4,094	0
Asian	43	58	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	78	326	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

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1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50-80% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	24.16%
White	22.14%
Black / African American	27.54%
Asian	42.57%
American Indian, Alaska Native	0.00%
Pacific Islander	0.00%
Hispanic	19.31%

50%-80% AMI: Percent with Housing Problems

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	1,064	9,774
White	777	6,967
Black / African American	124	2,079
Asian	25	89
American Indian, Alaska Native	0	10
Pacific Islander	4	0
Hispanic	69	274

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2016-2020 CHAS

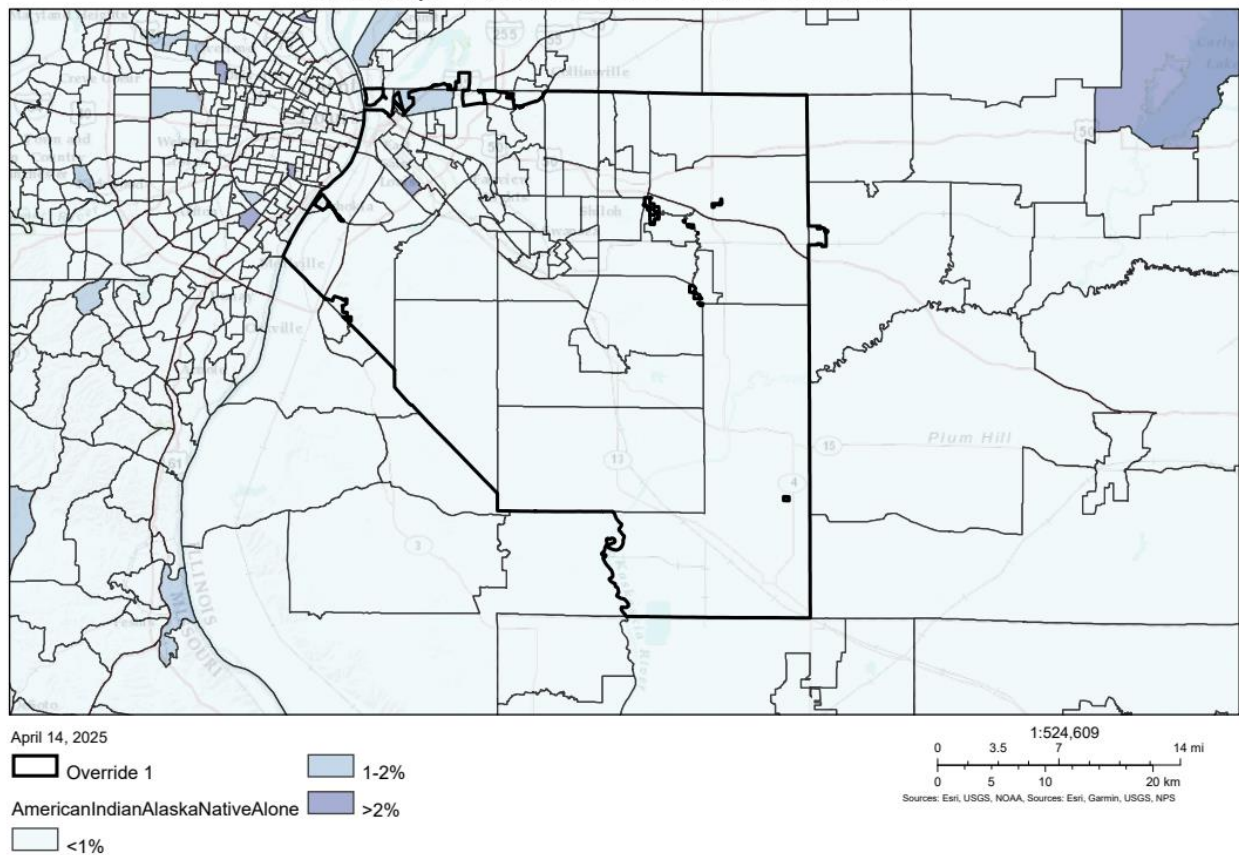
\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80-100% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	9.82%
White	10.03%
Black / African American	5.63%
Asian	21.93%
American Indian, Alaska Native	0.00%
Pacific Islander	0.00%
Hispanic	20.12%

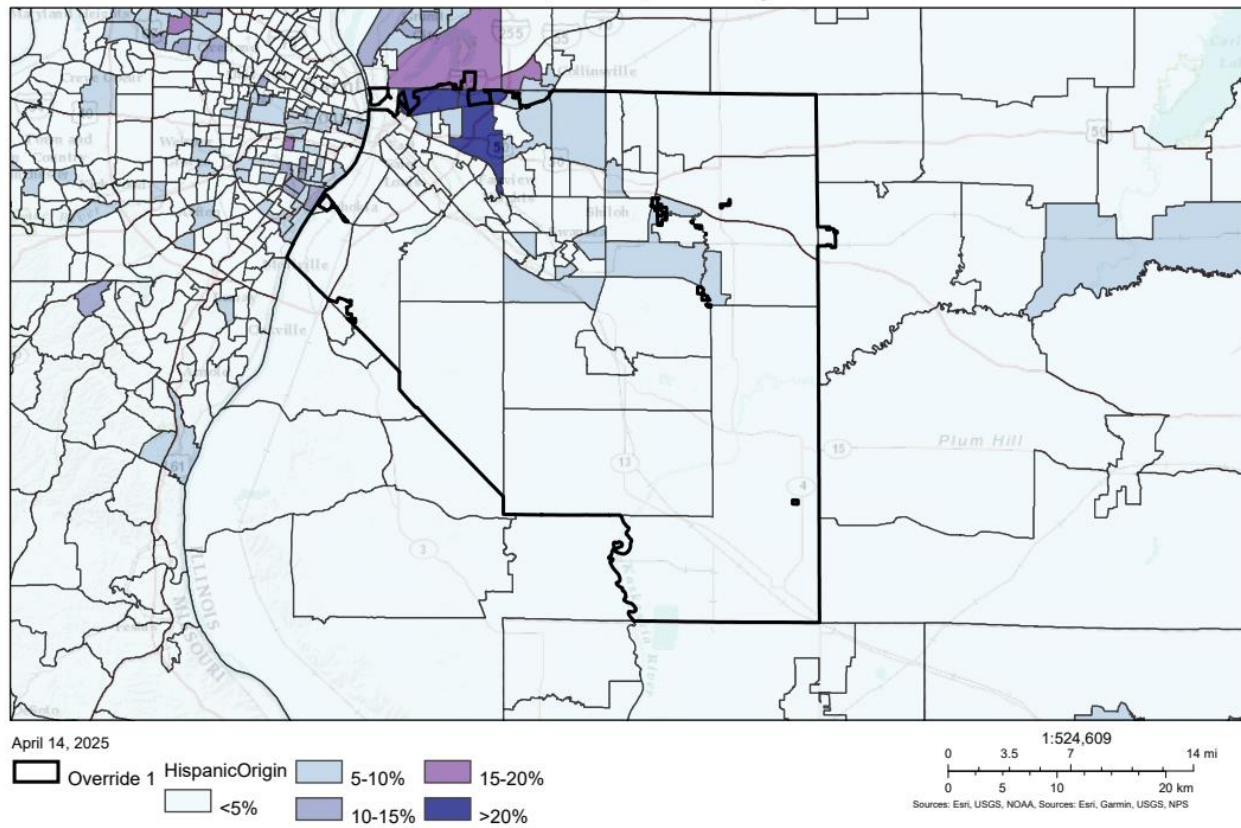
**80%-100% AMI: Percent with Housing Problems**

CPD Maps - American Indian and Alaska Native -



CPD Maps - American Indian and Alaska Native

## CPD Maps - Hispanic Origin -



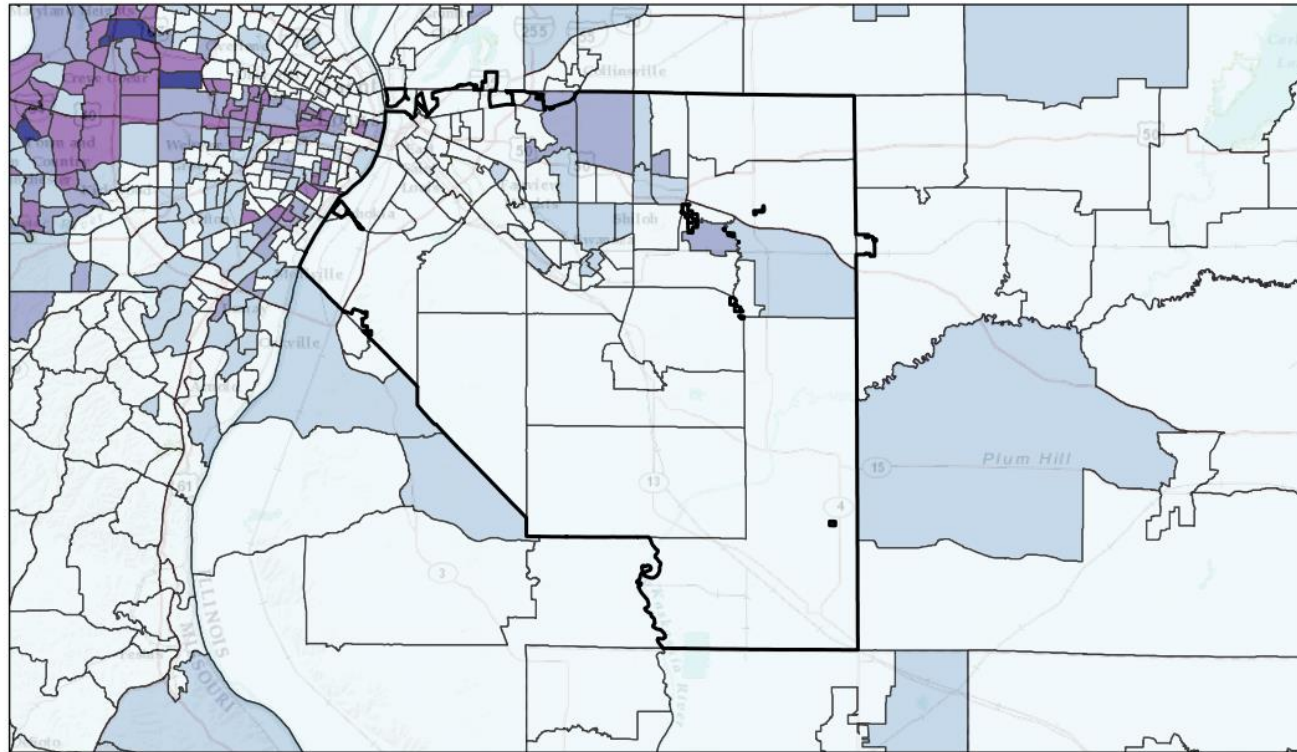
### CPD Maps - Hispanic Origin

## Consolidated Plan

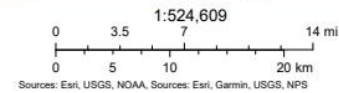
ST. CLAIR COUNTY

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# CPD Maps - Asian -



April 14, 2025



## CPD Maps - Asian

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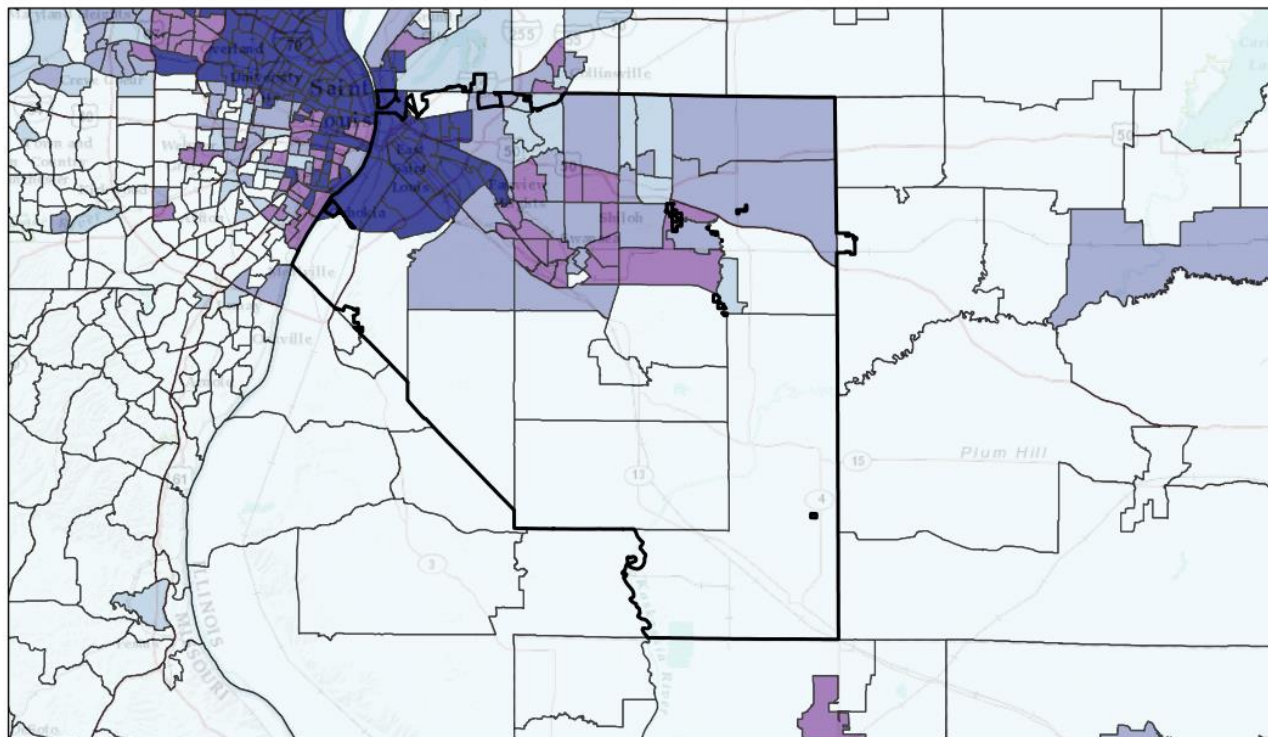
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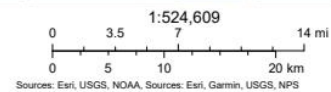
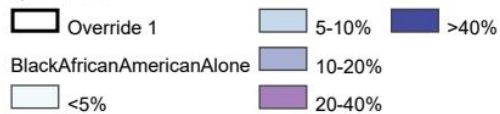
OMB Control No: 2506-0117 (exp. 06/30/2018)



# CPD Maps - Black / African American -



April 14, 2025



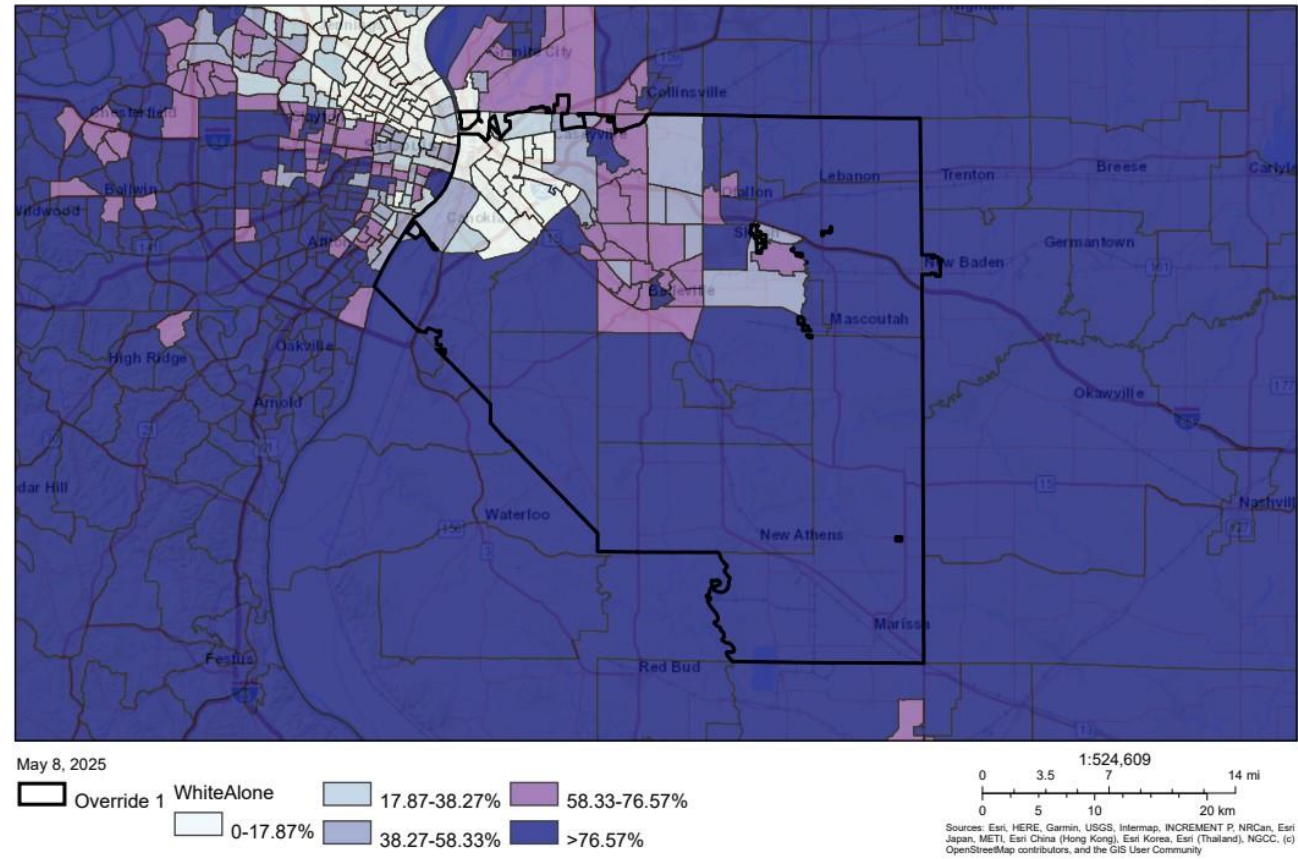
## CPD Maps - Black / African American

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# CPD Maps - White alone (not Hispanic) - Consolidated Plan and Continuum of Care Planning Tool



## CPD Maps – White alone (not Hispanic)

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## Discussion

In St. Clair County, twelve groups experience housing problems at a disproportionately greater rate:

1. Hispanic households at 0%-30% AMI
2. Asian households 0%-30% AMI
3. American Indian / Alaska Native households at 0%-30% AMI
4. Asian households 30%-50% AMI
5. Black / African American at 30%-50% AMI
6. American Indian / Alaska Native households at 30%-50% AMI
7. Hispanic households at 30%-50% AMI
8. Black / African American at 50%-80% AMI
9. Asian households at 50%-80% AMI
10. Asian households at 80%-100% AMI
11. White households at 80-100% AMI
12. Hispanic households at 80%-100% AMI

All together, these groups represent approximately 21,573 households and approximately 7,102 households with housing problems.

The calculations of disproportionately greater needs are shown in the attached tables, which were created using the HUD-provided CHAS data displayed in the tables earlier in this section. Groups with disproportionately greater needs are highlighted in blue. In some cases, the number of households in a racial or ethnic group is small, resulting in potentially misleading data. For example, there are only 154 Asian households at 30% - 50% of AMI, 139 of which experience housing problems. This results in a high percentage (90%) of households experiencing housing problems, but the overall numerical need is actually quite small.

Additionally, maps from CPD Maps are attached showing the geographic areas where racial or ethnic groups with disproportionately greater needs are located within the community.



## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

A disproportionately greater need exists when the members of racial or ethnic groups at an income level experience severe housing problems at a greater rate (10 percentage points or more) than the income level as a whole.

As an example, assume that 60% of all low-income households within a jurisdiction have a severe housing problem and 70% of low-income Hispanic households have a severe housing problem. In this case, low-income Hispanic households have a disproportionately greater need. The percentage of households with a severe housing problem is calculated by taking the HUD CHAS data from the tables below and dividing the number of households with a severe housing problem by the total of households with a severe housing problem and those without a severe housing problem.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	11,548	7,680
White	4,500	2,788
Black / African American	6,174	4,569
Asian	113	40
American Indian, Alaska Native	30	0
Pacific Islander	0	0
Hispanic	463	258

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

0-30% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	60.06%
White	61.75%
Black / African American	57.47%
Asian	73.86%
American Indian, Alaska Native	100.00%
Pacific Islander	0.00%
Hispanic	64.22%

0%-30% AMI: Percent with Severe Housing Problems

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	2,113	12,668
White	1,240	6,728
Black / African American	697	5,541
Asian	55	48
American Indian, Alaska Native	4	19
Pacific Islander	0	0
Hispanic	134	223

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30-50% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	14.30%
White	15.56%
Black / African American	11.17%
Asian	53.40%
American Indian, Alaska Native	17.39%
Pacific Islander	0.00%
Hispanic	37.54%

30%-50% AMI: Percent with Severe Housing Problems

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	540	18,360
White	393	12,047
Black / African American	127	5,515
Asian	4	97
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	14	392

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2016-2020 CHAS

\*The four severe housing problems are:

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1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50-80% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	2.86%
White	3.16%
Black / African American	2.25%
Asian	3.96%
American Indian, Alaska Native	0.00%
Pacific Islander	0.00%
Hispanic	3.45%

**50%-80% AMI: Percent with Severe Housing Problems**

**80%-100% of Area Median Income**

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems
Jurisdiction as a whole	322	10,519
White	199	7,557
Black / African American	49	2,159
Asian	250	89
American Indian, Alaska Native	0	14
Pacific Islander	0	4
Hispanic	34	319

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2016-2020CHAS

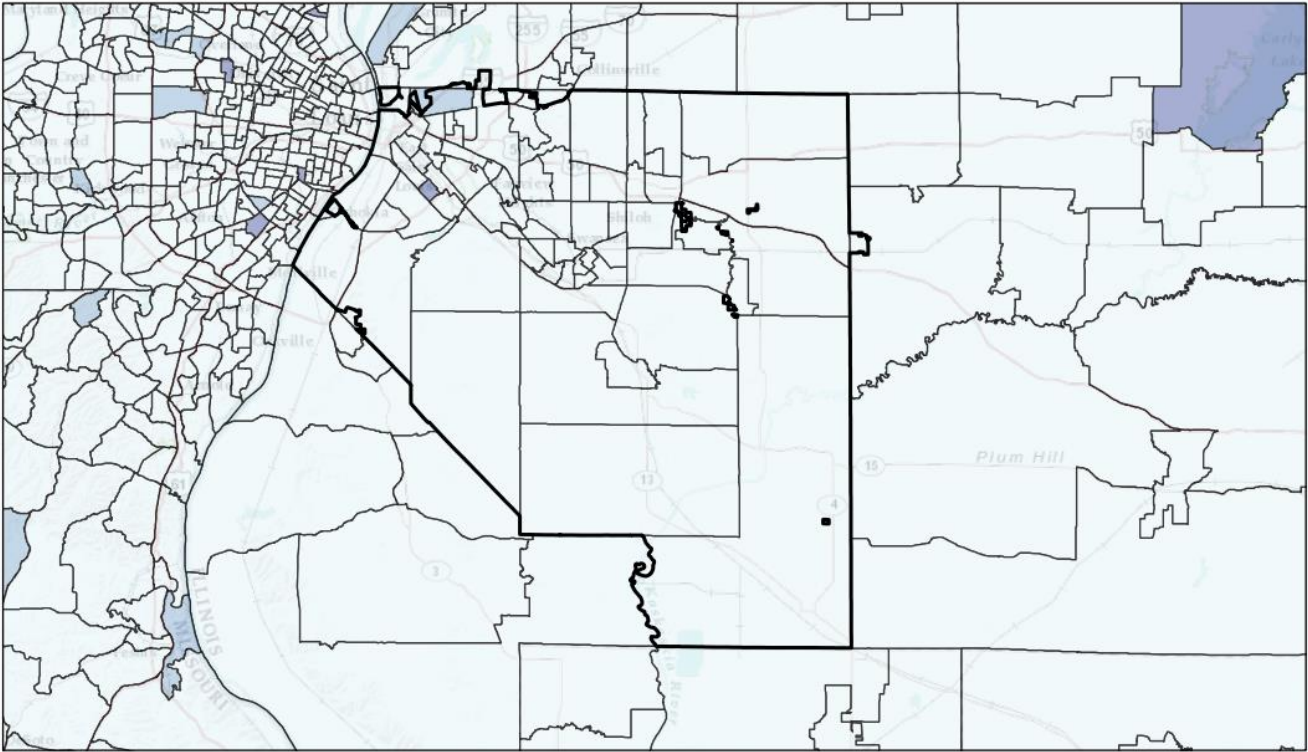
\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80-100% AMI	
Racial / Ethnic Group	Percent with Housing Problems
Jurisdiction as a whole	2.97%
White	2.57%
Black / African American	2.22%
Asian	73.75%
American Indian, Alaska Native	0.00%
Pacific Islander	0.00%
Hispanic	9.63%

80%-100% AMI: Percent with Severe Housing Problems

CPD Maps - American Indian and Alaska Native -



April 14, 2025

- Override 1
- AmericanIndianAlaskaNativeAlone
- <1%
- 1-2%
- >2%

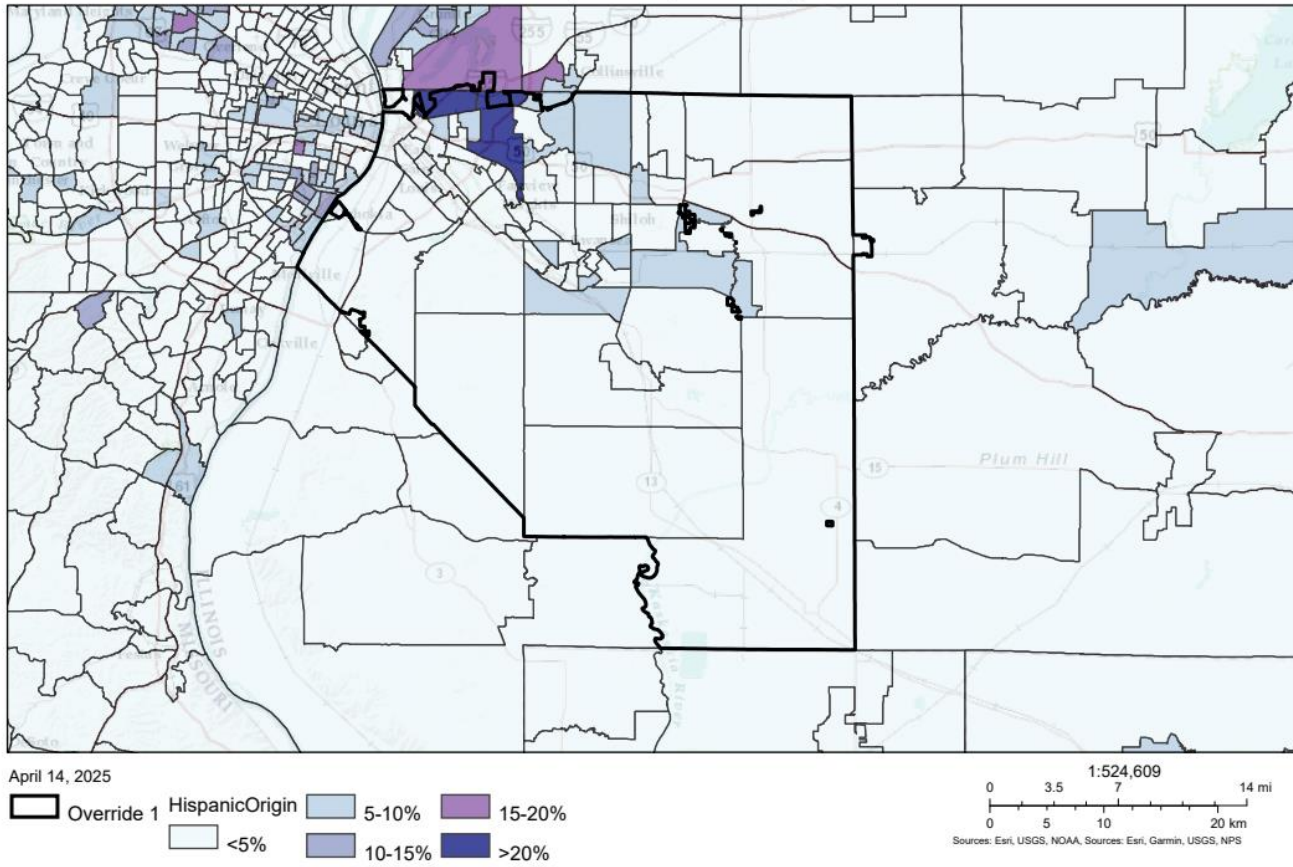
1:524,609  
0 3.5 7 14 mi  
0 5 10 20 km  
Sources: Esri, USGS, NOAA, Sources: Esri, Garmin, USGS, NPS

CPD Maps - American Indian and Alaska Native

Consolidated Plan

ST. CLAIR COUNTY

## CPD Maps - Hispanic Origin -



### CPD Maps - Hispanic Origin

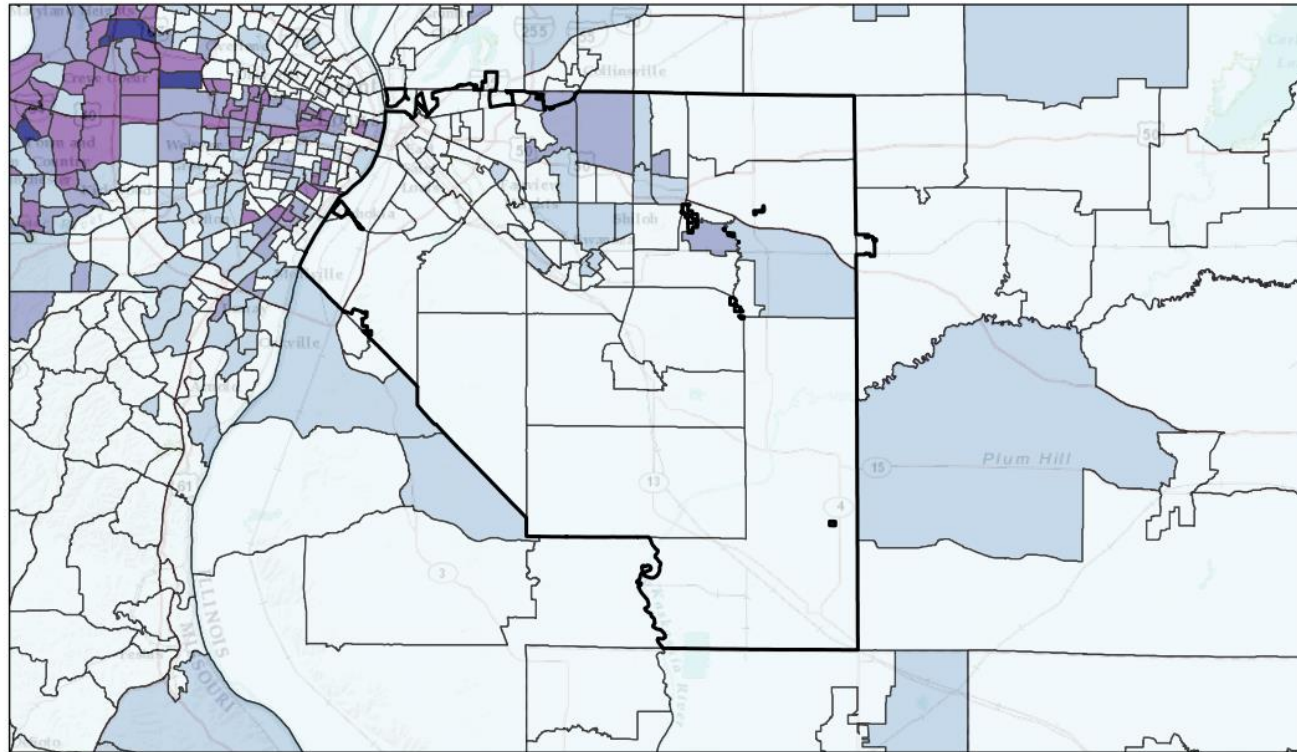
## Consolidated Plan

ST. CLAIR COUNTY

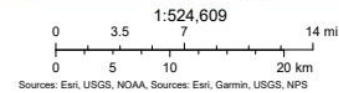
47



# CPD Maps - Asian -



April 14, 2025



## CPD Maps - Asian

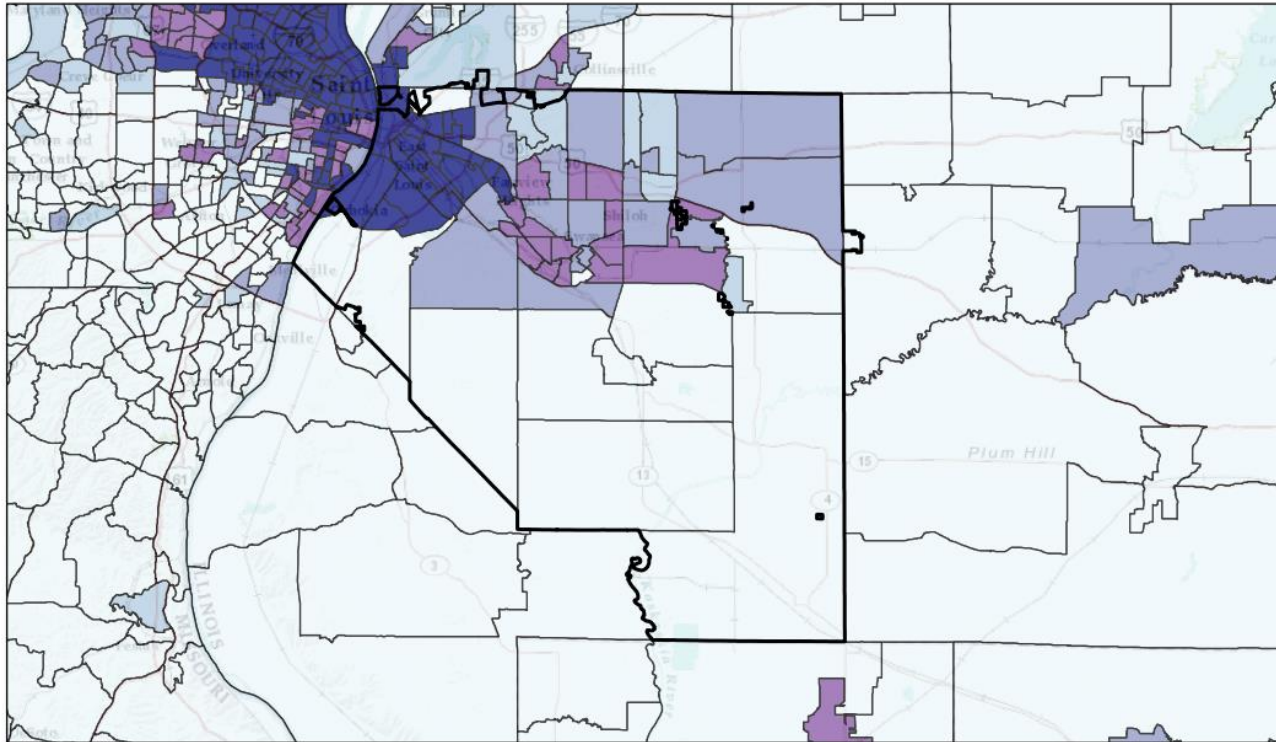
Consolidated Plan

ST. CLAIR COUNTY

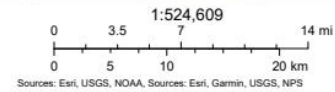
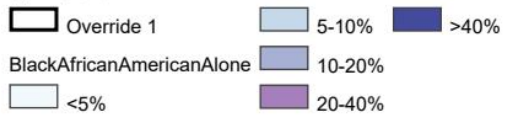
48



## CPD Maps - Black / African American -



April 14, 2025



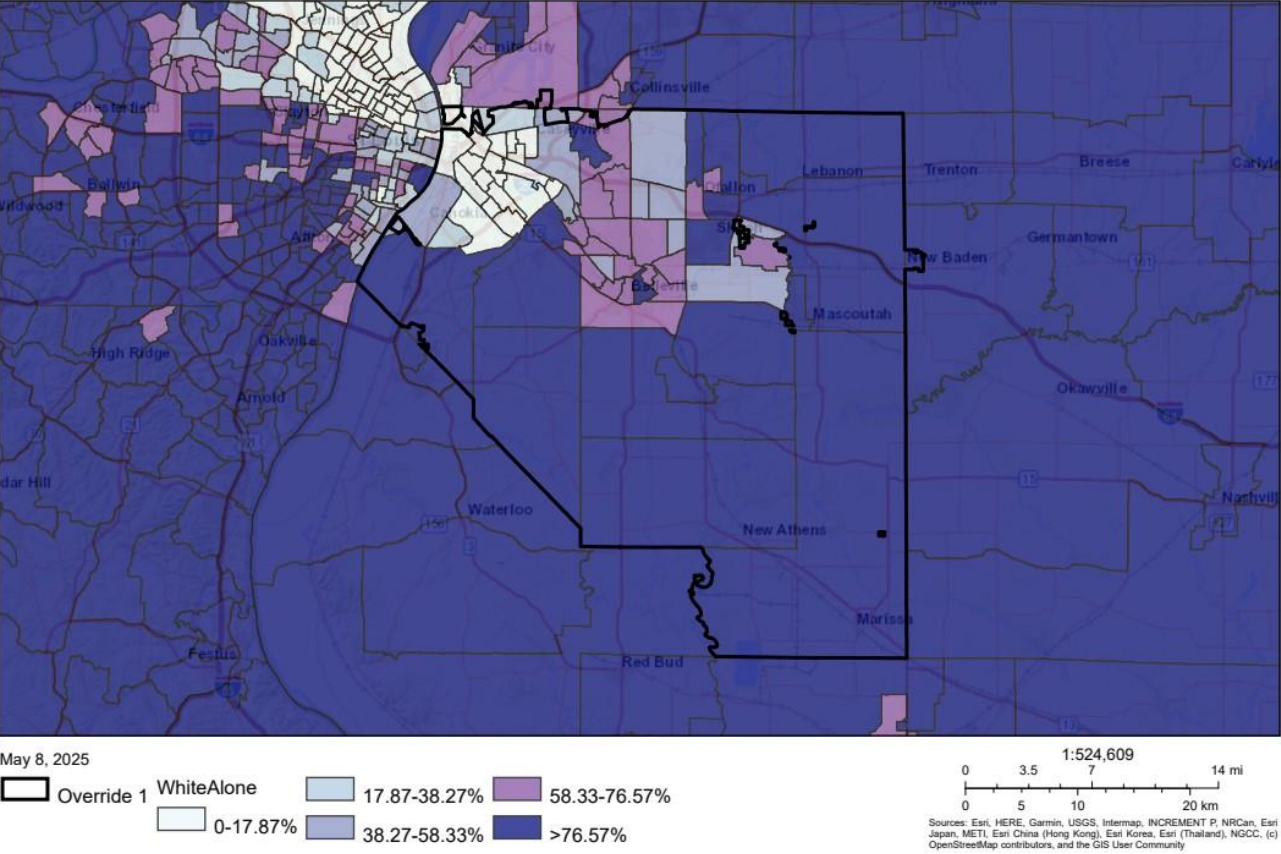
## CPD Maps - Black / African American

Consolidated Plan

ST. CLAIR COUNTY

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# CPD Maps - White alone (not Hispanic) - Consolidated Plan and Continuum of Care Planning Tool



CPD Maps – White alone (not Hispanic)

Consolidated Plan

ST. CLAIR COUNTY

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## Discussion

In St. Clair County, thirteen groups experience severe housing problems at a disproportionately greater rate:

1. White households at 0%-30% AMI
2. Hispanic households at 0%-30% AMI
3. American Indian/Alaska Native households at 0%-30% AMI
4. Asian households at 0%-30% AMI
5. White households at 30%-50% AMI
6. Asian households at 30%-50% AMI
7. Hispanic households at 30%-50% AMI
8. American Indian/Alaska Native households at 30%-50% AMI
9. White households at 50%-80% AMI
10. Asian households at 50%-80% AMI
11. Hispanic households at 50%-80% AMI
12. Asian households at 80%-100% AMI
13. Hispanic households at 80%-100% AMI

All together, these groups represent approximately 30,296 households and approximately 7,234 households with severe housing problems.

The calculations of disproportionately greater needs are shown in the attached tables, which were created using the HUD-provided CHAS data displayed in the tables earlier in this section. In some cases, the number of households in a racial or ethnic group is small, resulting in potentially misleading data. For example, there are only 23 American Indian/Alaska Native households at 30%-50% AMI, 19 of which experience severe housing problems. This results in a high percentage (82%) of households experiencing severe housing problems, but the overall numeric need is actually quite small.

Additionally, maps from CPD Maps are attached showing the geographic areas where racial or ethnic groups with disproportionately greater needs are located within the community.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

A disproportionately greater need exists when the members of racial or ethnic group experience housing cost burden at a greater rate (10 percentage points or more) than the income level as a whole.

As an example, assume that 60% of all households within a jurisdiction are housing cost burdened and 70% of Hispanic households are housing cost burdened. In this case, Hispanic households have a disproportionately greater need. The percentage of housing cost burdened households is calculated by taking the HUD CHAS data from the tables below and dividing the number of households with housing cost burden by the total of households. HUD specifies that the calculation should not include households with no/negative income, although they are included in the CHAS data in the following table.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	74,504	15,076	13,248	1,860
White	53,295	7,525	5,877	709
Black / African American	16,958	6,808	6,417	1,080
Asian	635	127	142	15
American Indian, Alaska Native	46	15	30	0
Pacific Islander	0	4	0	0
Hispanic	2,076	358	496	55

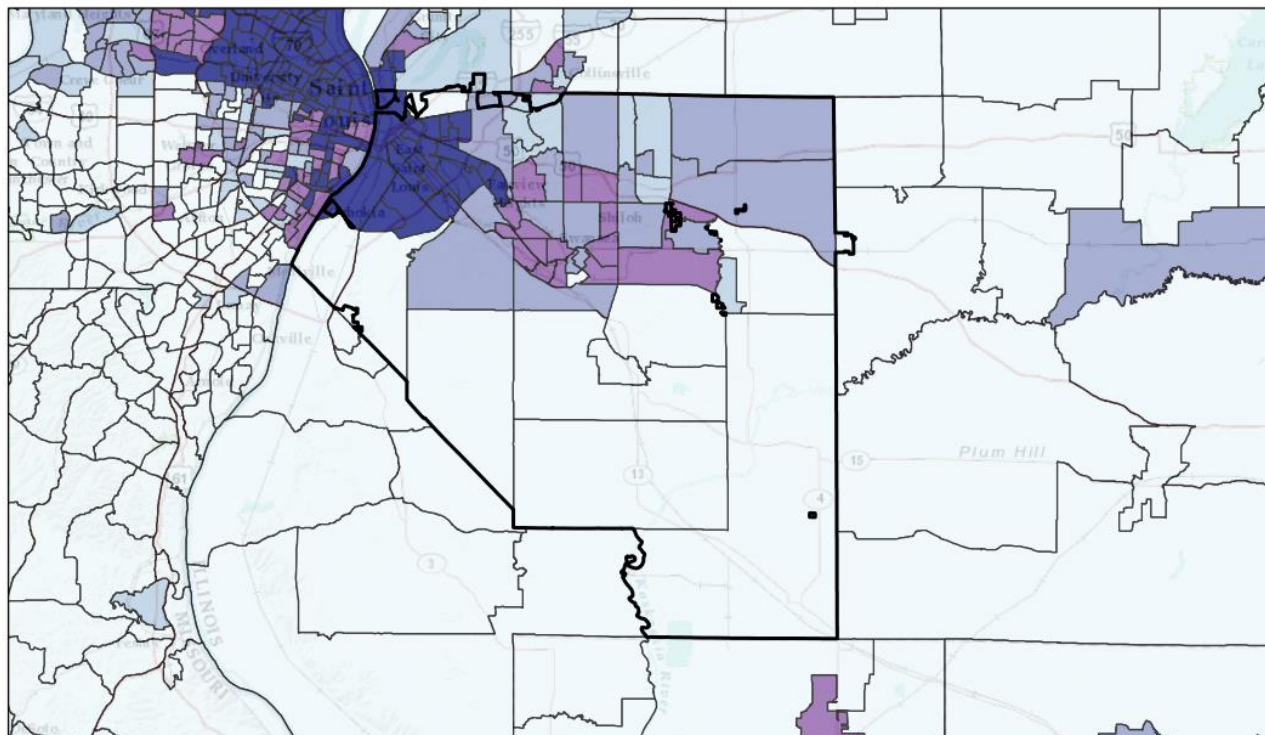
Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

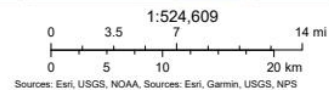
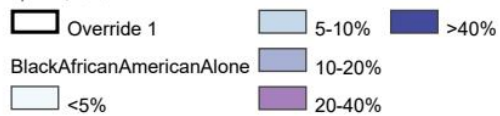
Racial / Ethnic Group	Housing Cost Burden		
	Between 30%-50%	Greater than 50%	Burdened at Any Level
Jurisdiction as a whole	15%	13%	28%
White	11%	9%	20%
Black / African American	23%	21%	44%
Asian	14%	16%	30%
American Indian, Alaska Native	16%	33%	49%
Pacific Islander	100%	0%	100%
Hispanic	12%	17%	29%

**Percent Housing Cost Burdened**

## CPD Maps - Black / African American -



April 14, 2025



## CPD Maps - Black / African American

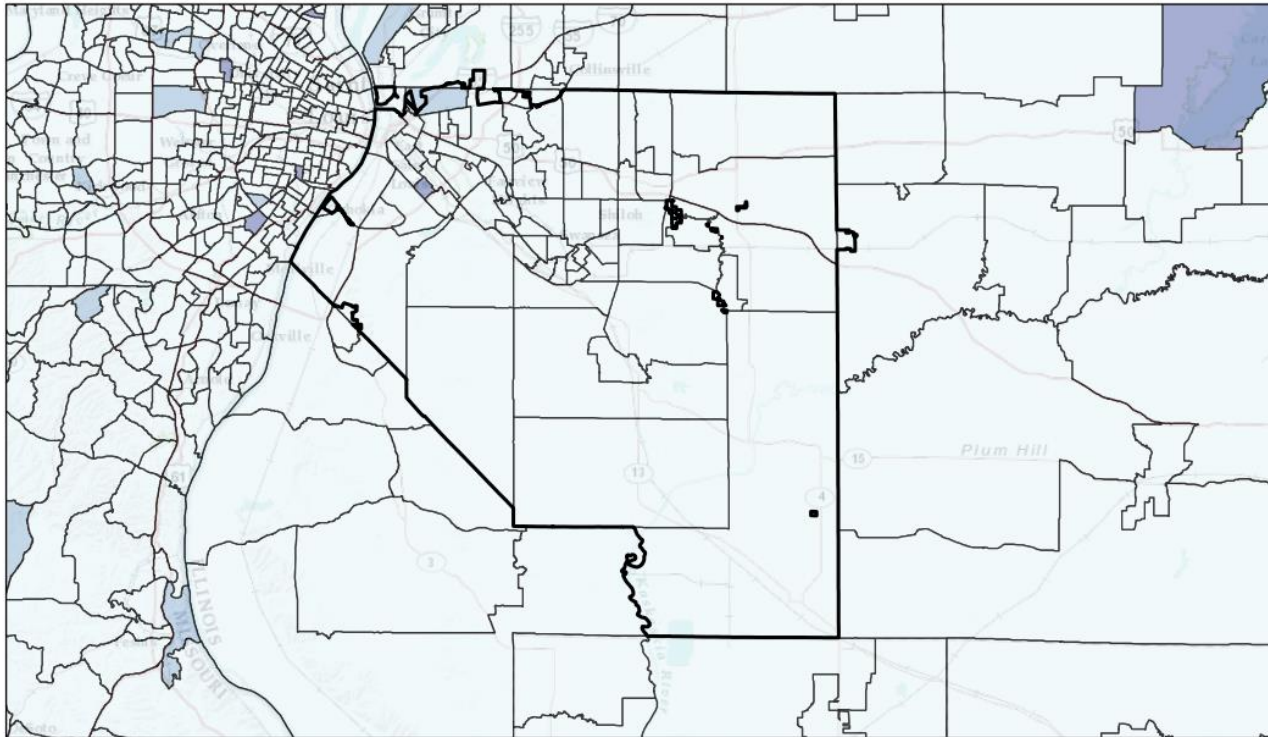
Consolidated Plan

ST. CLAIR COUNTY

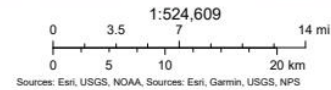
54



# CPD Maps - American Indian and Alaska Native -



April 14, 2025



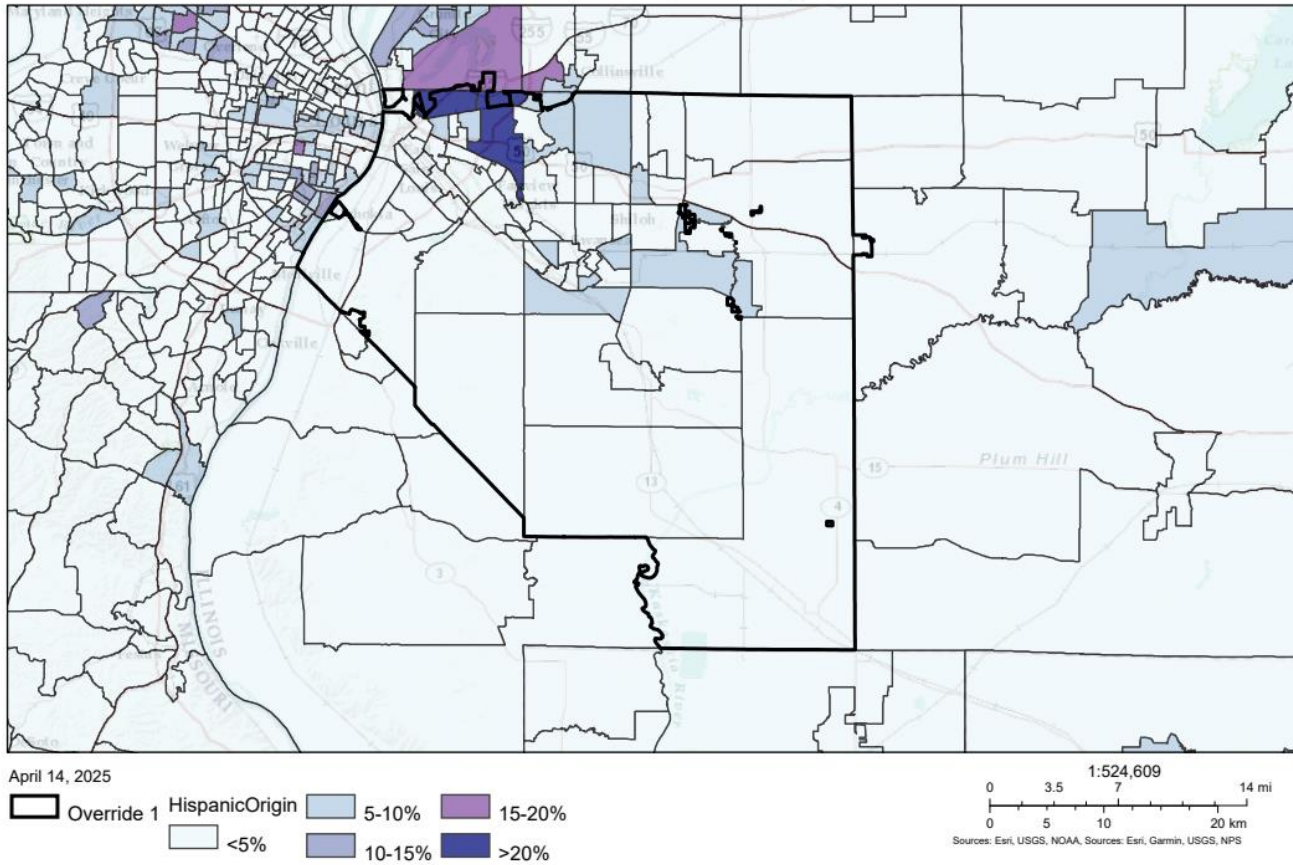
## CPD Maps - American Indian and Alaska Native

Consolidated Plan

ST. CLAIR COUNTY

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# CPD Maps - Hispanic Origin -



## CPD Maps - Hispanic Origin

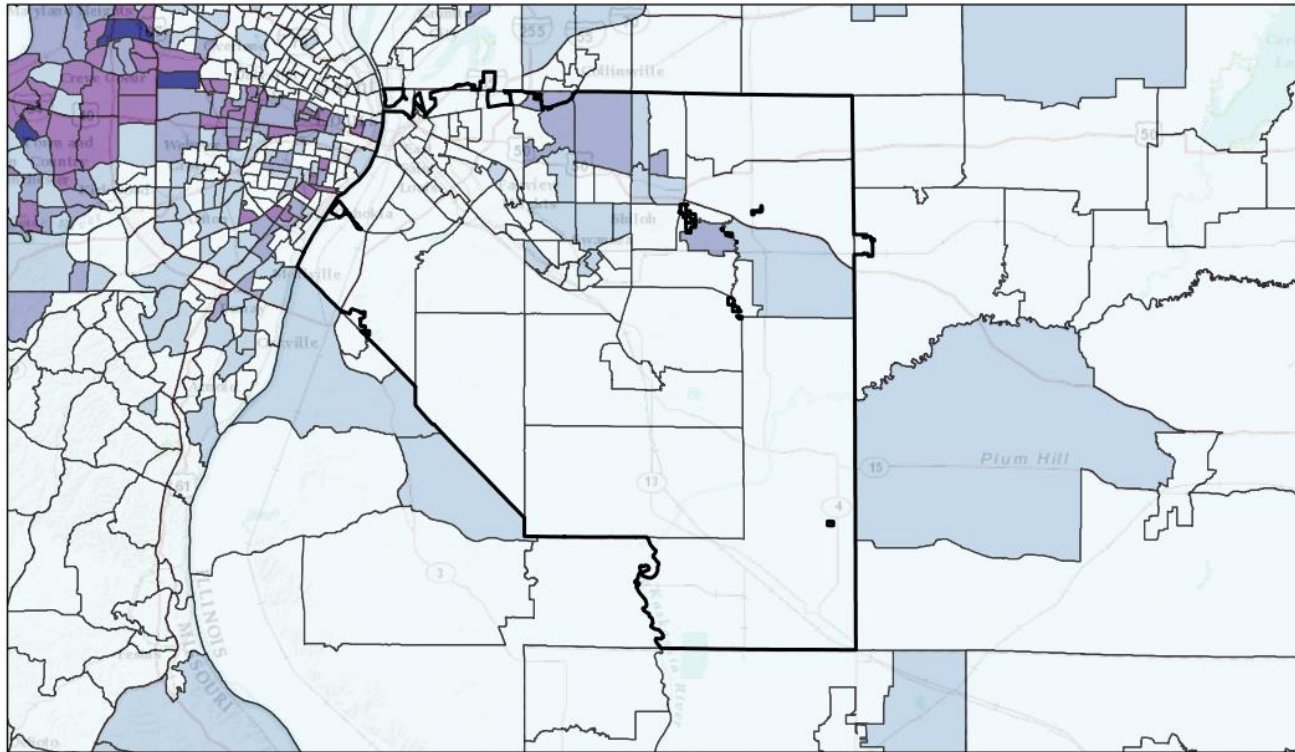
Consolidated Plan

ST. CLAIR COUNTY

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# CPD Maps - Asian -



April 14, 2025



1:524,609  
0 3.5 7 14 mi  
0 5 10 20 km  
Sources: Esri, USGS, NOAA, Sources: Esri, Garmin, USGS, NPS

## CPD Maps - Asian

Consolidated Plan

ST. CLAIR COUNTY

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OMB Control No: 2506-0117 (exp. 06/30/2018)

**Discussion:**

In St. Clair County, five groups experience housing cost burden and/or severe housing cost burden at a disproportionately greater rate (it is also important to note that housing cost burden is a factor in both the “housing problems” and “severe housing problems” calculations in Sections NA-15 and NA-20):

1. Black/African American households
2. Asian households
3. American Indian/Alaska Native households
4. Pacific Islander households
5. Hispanic households

The calculations of disproportionately greater needs are shown in the attached table, which was created using the HUD-provided CHAS data displayed in the table earlier in this section.

Additionally, maps from CPD Maps are attached showing the geographic areas where racial or ethnic groups with disproportionately greater needs are located within the community.

### **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

As detailed in sections NA-15, NA-20, and NA-25 above, there are several income categories where several racial or ethnic groups have disproportionately greater needs than the income category as a whole. These groups are:

- Hispanic households at 0%-30% AMI, 30%-50% AMI, 50%-80% AMI and 80%-100% AMI
- Asian households at 0%-30% AMI, 30%-50% AMI, 50%-80% AMI and 80%-100% AMI
- American Indian/Alaska Native households at 0%-30% AMI and 30%-50% AMI
- Black / African American households at 30%-50% AMI and 50%-80% AMI
- White households at 0%-30% AMI, 30%-50% AMI, 50%-80% AMI and 80%-100% AMI

Additionally, five groups experience housing cost burden at disproportionately greater rates. These groups are:

- Black/African American households
- Asian households
- American Indian/Alaska Native households
- Pacific Islander households
- Hispanic households

It is important to note the population of St. Clair County is 64.4% (almost two thirds) White alone and 30.6% (almost one third) Black/African American. Therefore, while multiple racial and ethnic groups have disproportionately greater needs on a percentage basis, there are also a particularly high number of White alone and Black/African American households experiencing housing problems and or severe housing problems and a particularly high number of Black/African American households experiencing housing cost burden at disproportionately greater rates.

**If they have needs not identified above, what are those needs?**

Key household needs include high housing cost burden and occasionally poor housing quality/safety. High housing cost burden occurs when households are spending a high percentage of their income on rent or mortgage costs and can theoretically be solved through either lower rent/mortgage costs (via affordable housing development or housing vouchers) or higher household incomes (via, for example, job training services). Housing quality/safety can sometimes become an issue when households do not have the funds necessary to complete the home repairs needed.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

As shown in the tables attached to sections NA-15, NA-20, and NA-25 above, each individual racial or ethnic group with disproportionately greater needs tends to be located within specific geographies in St. Clair County. However, each racial or ethnic group also tends to be located in different parts of St. Clair County than the others. For example, the areas with high concentrations of White alone households are different from the areas with high concentrations of Hispanic households, Asian households, American Indian/Alaska Native households, or Black/African American households. The majority of communities within St. Clair County have members of racial or ethnic groups with disproportionately greater needs.

## NA-35 Public Housing – 91.205(b)

### Introduction

N/A

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	843	2,165	82	2,082	0	0	0

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

### Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	11,690	13,451	0	13,451	0	0	0

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Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average length of stay	0	0	6	6	0	6	0	0
Average Household size	0	0	2	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	307	161	0	161	0	0
# of Disabled Families	0	0	146	483	0	483	0	0
# of Families requesting accessibility features	0	0	970	1,575	0	1,575	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	224	291	0	291	0	0	0
Black/African American	0	0	741	1,282	0	1282	0	0	0
Asian	0	0	2	2	0	2	0	0	0

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	1	0	0	0	0	0	0
Pacific Islander	0	0	2	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	19	30	0	30	0	0	0
Not Hispanic	0	0	1,545	1,545	0	1,545	0	0	0
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

Approximately nineteen (19) percent of the households on the wait lists (Public Housing and Section 8 HCVF) indicate that they have a disability, including being elderly. Computer software does not permit the extrapolation of exact numbers, but staff insight gained from experience indicates that the most common declared disability is in the “other” category. Many, if not most of these are related to mental health. “Mobility” impairment is the second most declared disability / accessibility. The majority of these cases do not equate to the need for fully accessible units, but rather more commonly there is a need for a ground floor unit due to the inability to climb stairs on a regular basis due to health issues. There is considered to be a relatively low level of need for fully accessible units related to wheel-chair use (estimated at five percent (5%) of less than current applicants). Vision and hearing impairments are the least declared disabilities among applicants ---estimated at two percent (2%) or less of the applicant pool and, again, many of these applicants are not seeking or in need of units that have been modified with accessibility features to accommodate their disability. They simply note their disability on the application form.

The public housing resident population is reflective of the applicant pool. Approximately twenty percent (20%) report having a disability. The percentage breakdown between “other”, mobility, vision and hearing is found by staff to be very similar to applicant population.

SCCHA is operating under a Section 504 / ADA Accessibility Self-Evaluation and Accessibility Transition Plan that was professionally completed in September 2012. Most exterior areas at public locations have already been modified to meet ADA accessibility standards. Where the work has not yet been completed, it is planned for completion within the next one to three years, subject to fund availability. SCCHA’s overall housing inventory meets the minimum of five percent (5%) of units accessible to households with mobility impairments and two percent (2%) of units with modifications to accommodate applicants with vision and hearing impairments. As stated earlier, most of SCCHA’s public housing inventory was built more than forty (40) years ago, when accessibility requirements were for the most part non-existent. Over the years, when SCCHA completed substantial renovations at a public housing property, it provided for the required accessibility standards. Unit conversions / modifications are “projected” under SCCHA’s Transition Plan at locations that have not yet undergone substantial rehabilitation. The previously “projected” work was placed under contract effective April 2020 and is scheduled to be completed by the end of the year. In response to increasing demand, two efficiency units at 134 North Second Street Apt. 2 and Apt. 3 in Dupo were transformed in 2020 into a one-bedroom ADA-compliant unit accessible for wheelchair users.

In the forthcoming 5-Year Plan for the period of 2025-2029, we have included a work item dedicated to the renovation of all Dupo units. This initiative encompasses the transformation of two efficient units, specifically those with no bedrooms, into a single ADA-compliant one-bedroom



unit. The specific addresses earmarked for this conversion are 130 North Second Street, Apartment 2, and 130 North Second Street, Apartment 3.

In addition to maintaining the required number of accessible units in its overall inventory, SCCHA, as required by law, responds to individual resident requests for reasonable accommodation for unit modifications related to their disability. This is done on an on-going basis, with each request being reviewed on a case-by-case basis. SCCHA has demonstrated its commitment to meet the accessibility needs of current residents in any manner reasonably possible.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

As of May 14,2025, there were 5,561 unduplicated households on the Section 8 Housing Choice Voucher Program (HCVP) wait list. Although the Section 8 HCVP wait list is not separated by bedroom size needed, the number of families by number of bedrooms needed is tracked for planning and informational purposes and is provided below:

0 – Bedroom	1
1 – Bedroom	2,442
2 – Bedroom	1,941
3 – Bedroom	1,133
4 – Bedroom	3296
5 - Bedrooms	41
6 – Bedrooms	3

**Number of Household on Wait List for Section 8 HCVP (04/16/25)**

**Total: 5,561**

SCCHA also maintains 18 separate site-based waiting lists for its Public Housing Program. Applicants can apply for as many locations as they desire, as long as they meet the occupancy designation requirements for the location and the location has units of appropriate size given family composition (for example, some locations are designated for senior citizens only.) Since applicants can be on multiple public housing waiting lists at the same time, the "Grand Total" numbers below are inflated because of the duplicated counts. However, the "Totals" the far-right column reflect the unduplicated count of applicants for that particular location. These numbers demonstrate a strong need for affordable housing.

**Public Housing Wait List by Location and Bedroom Size (January 31, 2025)**

LOCATION	1-BR	2-BR	3-BR	4-BR	5-BR	Total*
ADELINE JAMES - CENTREVILLE	29	1				30
AMBER COURT BELLEVILLE	454	20				474
BEL-PLAZA 2 - 47TH ST	374					374
BEL-PLAZA 1 - CHURCH ST	320					320
BROOKLYN PH	761	336	67	25	11	1,200
DUPO APARTMENTS	317	662	383	67		1,429
ERNEST SMITH - CENTREVILLE	1,119	461	1	32	1	1,614
FULLERTON - SWANSEA	502					502
HAWTHORNE-ALORTON	1,120	683	284	28		2,115
LEBANON	971	660	481			2,112
LENZBURG	445	397	238			1,080
MARISSA	435	168	98	30		731
MILLSTADT	181	779	473			1,433
NEW ATHENS	321	306				627
OFALLON		1,458				1,458
PVT MATHISON - CENTREVILLE	1,147	616	134	27		1,924
SMITHTON	161		399	28		588
WASHINGTON PARK	548	495				1,043
GRAND TOTAL	9,205	7,042	2,558	237	12	19,054**

SOURCE: St. Clair County Housing Authority

\* All totals in the "Total" Column are the total values represented in the current row

\*\* Includes 0 and 6 bedrooms, not represented in the table.

### **How do these needs compare to the housing needs of the population at large**

The residents of St. Clair County exhibit a collective demand for affordable rental housing alternatives. An analysis of current public housing waitlists indicates that there may be a need for additional four-bedroom rental units, contingent upon the dynamics of the local market. According to data from the American Community Survey spanning 2019 to 2023, the average household size in St. Clair County is recorded at 2.47, while the U.S. Census Bureau reports a higher average family size of 3.15 individuals. It is essential to conduct target market studies to ascertain the specific requirements for units with designated bedroom configurations prior to the allocation of funding for new housing developments.

### **Discussion**

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	60	9	69	75	125	116
Persons in Households with Only Children	0	0	0	0	0	
Persons in Households with Only Adults	154	14	168	184	304	117
Chronically Homeless Individuals	2	2	2	4	7	143
Chronically Homeless Families	0	0	0	0	0	0
Veterans	26	0	26	28	47	117
Unaccompanied Youth	6	0	0	0	0	0
Persons with HIV	9	0	9	10	16	143

**Table 26 - Homeless Needs Assessment**

Alternate Data Source Name:

2025 PIT Count

Data Source Comments:

Indicate if the homeless population is:	Has No Rural Homeless
---	-----------------------

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Local service providers estimate that there are approximately 1,100 to 1,500 homeless individuals in St. Clair County. These local service providers indicate the homeless population has doubled and agencies are not able to keep pace.

Reasons for the increasing homeless population include job losses from the declining economy and the increase in the cost of living. Household expenses have increased in the areas of food, rent, fuel, utilities, education, medical, etc. The current economy has created overcrowded conditions in existing shelters and a devastating impact on the quality of outreach and assessment services provided by local service providers.

The overcrowding conditions in the shelters leave no room for the families that are homeless. As shown in a survey of social service agencies and governments in St. Clair County, other groups were identified as having homeless segments. Additionally, many of the clients of Chestnut Health Systems are homeless.

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

On January 23, 2025, when the St. Clair County Continuum of Care conducted a Point in Time count, there was an estimated 1 unsheltered homeless family with children, equating to an estimated 9 unsheltered persons. The actual need, however, is expected to be much higher.

Similarly, the Point in Time count identified 1 unsheltered homeless veteran family and 25 homeless Veteran individuals, though the actual need for both veterans and the families of veterans is, again, expected to be much higher.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

Typically, the majority of homeless persons and households recorded in the HMIS are African American. However, there are likely additional unidentified and untracked homeless persons and households, especially in rural areas.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

In St. Clair County, as is the case in most areas of the country, tracking and establishing a reliable count of the homeless population is extremely difficult. As a result, census Point In Time counts of the homeless are widely looked upon as underreported. Local service providers have verified that the homeless population is larger than reported and indicated that the demand for services far outpaces available resources. Local service providers estimate that there are approximately 1,500 to 2,000 homeless individuals in St. Clair County. These local service providers indicate the homeless population has doubled and agencies are not able to keep pace.

In response to the challenges of tracking the homeless population and service delivery, St. Clair County Continuum of Care Program projects utilize a Homeless Management Information System (HMIS) for tracking population and services.

Reasons for the increasing homeless population include job losses from the declining economy and the increase in the cost of living. Household expenses have increased in the areas of food, rent, fuel, utilities, education, medical, etc. The current economy has created overcrowded conditions in existing shelters and a devastating impact on the quality of outreach and assessment services provided by local service providers.

The overcrowding conditions in the shelters leave no room for the families that are homeless. As shown in a survey of social service agencies and governments in St. Clair County, other groups were identified as having homeless segments. Additionally, many of the clients of Chestnut Health Systems are homeless.

Homeless persons and families have received housing through St. Clair County Housing Authority programs, Hoyleton Youth and Family Services, HUD Continuum of Care Programs, and other Supportive Housing Programs.

**Discussion:**

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

N/A

### **Describe the characteristics of special needs populations in your community:**

According to 2023 American Community Survey data on disability rates (S1810), 37,352 St. Clair County residents, or 15.1% of civilian, non-institutionalized persons, have a disability. Of these 37,352 residents, approximately 6.5% are youth under the age of 18, 27.3% are adults ages 18-64, and 74.5% are seniors 65 years of age or older. For the purposes of the American Community Survey, residents who report having anyone (or multiple) of six disability types (hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty) are considered to have a disability.

There are additional non-homeless populations who require supportive housing. There are 2,800 families in public housing in St. Clair County. 41,556 St. Clair County Residents are elderly persons over the age of 65. According to the St. Clair County Health Department 2024 Annual Report, 748 persons living with HIV in St. Clair County were served through Ryan White Case Management services with an overall HIV viral suppression rate of 92.2%. <sup>1</sup>

Additionally, a substantial portion of the households on the SCCHA Public Housing and Section 8 HCVP wait lists indicate that they have a disability. The majority of these cases do not equate to the need for fully accessible units, but rather more commonly there is a need for a ground floor unit due to the inability to climb stairs on a regular basis due to health issues. There is considered to be a relatively low level of need for fully accessible units related to wheel-chair use (estimated at five percent (5%) of less of current applicants). The public housing resident population is reflective of the wait list applicant pool.

146 or 15% of SCCHA public housing households report having a disability, while 307 or 32% are over the age of 62. Many of these disabled and elderly residents require supportive services to live independently. The exact number / percentage needing supportive services is not known (is

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<sup>1</sup> <https://scchealthdept.com/wp-content/uploads/2025/03/2024-Annual-Report.pdf>



not tracked), although through antidotal reports the conservative estimate is at least half (50%) of these households require supportive services to remain independent. SCCHA property managers report many cases of having to deal with residents with alcohol and/or drug (prescription and illicit) addictions, but an exact number of residents battling these issues is unknown.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Special needs persons generally face two key challenges: the challenge of finding quality affordable housing and the challenge of finding appropriate supportive services. Objectives for affordable housing for special needs persons overlap with the objectives for affordable housing for very low, low, and moderate income residents, and the objectives for supportive services for special needs persons overlap with the objectives for supportive services for other at-risk populations.

#### **Housing Needs**

Special needs persons often face the same sorts of housing challenges as very low, low- and moderate-income residents. The availability of quality affordable housing can give special needs persons the ability to focus their energy and resources on obtaining the supportive services they require. To meet the affordable housing needs of its special needs populations, St. Clair County plans to continue using a portion of the St. Clair County, City of Belleville and City of East St. Louis CDBG funding to provide loans and grants to owner-occupants for home repairs (including emergency home repairs) and home improvements (including accessibility improvements).

All eligible persons (i.e. elderly, special needs, homeless, small families and large families) throughout St. Clair County may seek assistance for any of the above- mentioned programs.

#### **Supportive Service Needs**

Although special needs persons are generally not homeless, they do require some of the same sorts of supportive services that IGD coordinates through the Housing Resource Center, the Homeless Action Council, and the St. Clair County Continuum of Care. Specifically, the following supportive service strategies will be of benefit to non-homeless special needs persons:

- Continue to maintain and utilize the Homeless Management Information System (HMIS) for tracking population and services, minimizing duplication of effort, and maximizing the distribution of homeless prevention funds to needy individuals and families. Despite the name,

the HMIS tracks supportive services received by non-homeless persons and households who may be at risk for homelessness due to extenuating circumstances, such as disability, domestic violence, or substance abuse.

- Administer Low-Income Home Energy Assistance Program (LIHEAP) funding to assist low-income households in paying home energy bills, in order to make housing temporarily more affordable.
- Utilize Community Services Block Grant (CSBG) funding to provide rental, deposit, and mortgage assistance.
- Partner with private nonprofits through the Housing Resource Center and the Homeless Action Council to connect the population with special needs with services such as prescription assistance, meal assistance, and short term specialized care.
- Coordinate with the Veteran's Assistance Center to refer clients, allowing them access to services offered by each agency.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

The Eligible Metropolitan Statistical Area (EMSA) is a complex bi-state region of urban, suburban and rural communities, encompassing six counties and the independent City of St. Louis in Missouri and five counties in Illinois.

A disproportionate share of those affected by HIV/AIDS face socio-economic challenges (poverty, lack of education, and unemployment), making them more vulnerable to a variety of co-occurring conditions, including mental illness and substance abuse. The number of people living with HIV/AIDS who are in need of ongoing rental assistance and support in order to achieve housing stability and improved access to care continues to grow.

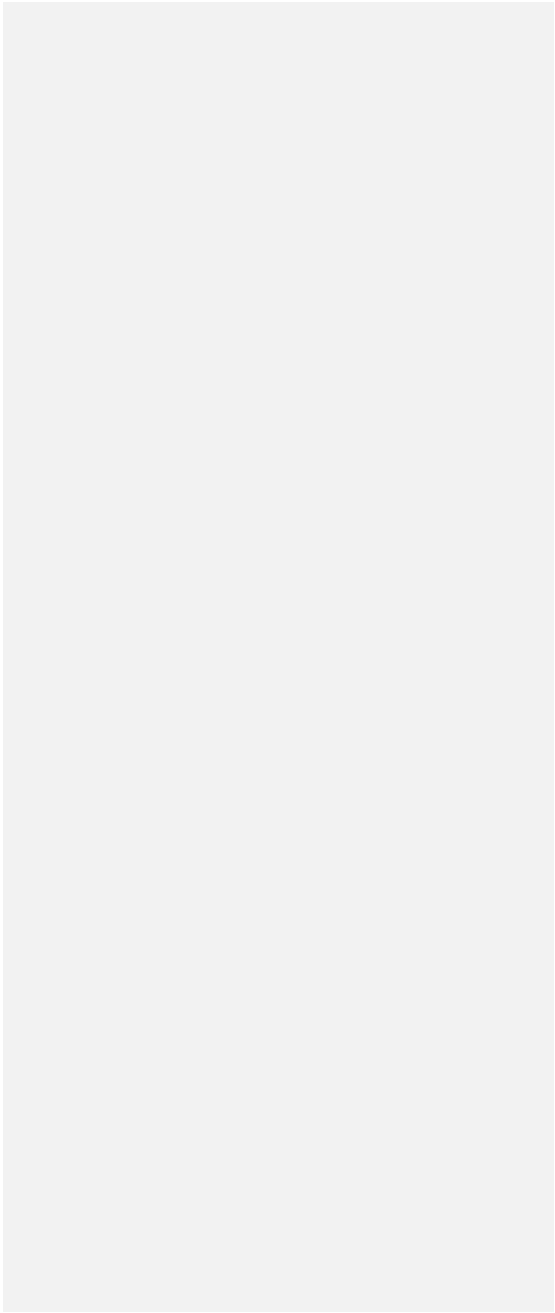
EMSA needs assessment activities completed over the last several years, including client surveys and focus groups, to demonstrate that the demand for housing services remains far higher than the amount of funding available to support housing services in the EMSA.

Continued funding for housing services to persons with HIV/AIDS remains vital to public health. Research confirms a structural link between stable housing, health outcomes, and healthcare costs among people living with HIV/AIDS. Currently, the EMSA is focusing on continuing to serve needs for facility based, tenant-based rental assistance, short term mortgage assistance, rent and utilities assistance, case management, and housing information services.

St. Clair County does not receive HOPWA funding to specifically address housing and supportive service needs of the population with HIV/AIDS.

**Discussion:**

N/A



## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

There is a high need for Public Facilities and Improvements in St. Clair County and Public Facilities and Improvements are identified as a high priority goal.

### **How were these needs determined?**

Each year, St. Clair County IGD issues an application to municipalities, in addition to public hearings and surveys, for public facilities and improvements funding via the CDBG program, and every year the need far outpaces resources available. Applications are scored based on factors such as, but not limited to, project need, the number of persons expected to benefit from the project, the financial need of the community, and whether or not resources will be leveraged.

### **Describe the jurisdiction's need for Public Improvements:**

There is a high need for Public Facilities and Improvements in St. Clair County and Public Facilities and Improvements are identified as a high priority goal.

### **How were these needs determined?**

Each year, St. Clair County IGD issues an application to municipalities, in addition to public hearings and surveys, for public facilities and improvements funding via the CDBG program, and every year the need far outpaces resources available. Applications are scored based on factors such as, but not limited to, project need, the number of persons expected to benefit from the project, the financial need of the community, and whether or not resources will be leveraged.

### **Describe the jurisdiction's need for Public Services:**

While there is a high need for Public Services in St. Clair County, the County does not receive ESG or HOPWA funding and has limited funding eligible to address the collective needs of homeless, non-homeless special needs, and general low-to-moderate income populations.

### **How were these needs determined?**

Needs were determined through consultation with stakeholders, St. Clair County staff, and the general public through a thorough community engagement process including multiple public meetings throughout the jurisdiction and a general survey, .Additionally, St. Clair County intends to solicit applications for specific public service programs via an RFP process.

## Housing Market Analysis

### MA-05 Overview

#### Housing Market Analysis Overview:

There is an overall need for affordable housing options, especially the preservation and rehab of existing homes.

Additionally, there are sharp contrasts in the economic status of St. Clair County residents and the availability of safe, quality, affordable housing options in different communities. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while other communities, such as Belleville, Fairview Heights, and O'Fallon, have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

There is an overall need for affordable housing options, especially the preservation and rehab or existing homes.

Additionally, there are sharp contrasts in the economic status of St. Clair County residents and the availability of safe, quality, affordable housing options in different communities. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while other communities, such as Belleville, Fairview Heights, and O'Fallon, have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	82,815	70%
1-unit, attached structure	4,217	4%
2-4 units	10,080	9%
5-19 units	10,335	9%
20 or more units	4,417	4%
Mobile Home, boat, RV, van, etc	5,879	5%
Total	117,473	100%

Table 27 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Property Name	Community	Overall Contract Expiration Date	Number of Units
Rush Senior Gardens	East St. Louis	12/31/2027	53
Westfield Manor	Belleville	10/31/2028	62

Assisted Housing Developments with Contracts Expiring in 2025-2029

Property Name	Community	Placed in Service Year	Number of Units
Wingate Manor I	Shiloh	2010	48
Williamsburg Apts.	Belleville	2011	88
Sinai Village	East St. Louis	2011	30
Knollwood Retirement Center St. Clair	Caseyville	2011	83

#### LIHTC Projects Reaching End of Compliance in 2025-2029

#### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	133	0%	1,454	4%
1 bedroom	1,271	2%	7,293	21%
2 bedrooms	13,605	20%	14,423	41%
3 or more bedrooms	51,634	77%	12,044	34%
<b>Total</b>	<b>66,643</b>	<b>99%</b>	<b>35,214</b>	<b>100%</b>

Table 28 – Unit Size by Tenure

Data Source: 2016-2020 ACS

#### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to the 2024 HUD Picture of Subsidized Households data, St. Clair County has an estimated 5,161 persons (2,696 households) utilizing Housing Choice Vouchers and 1,464 persons (861 households) living in Section 8 housing. Additionally, according to HUD databases, there are multiple Low Income Housing Tax Credit (LIHTC) developments in St. Clair County, with many units located in East St. Louis.

#### Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.



HUD has created the Multifamily Assistance and Section 8 Contracts Database to provide HUD partners with a way of measuring the potential impact of expiring project-based subsidy contracts in their communities. The database is updated regularly, although there is no guarantee that the database is complete or all inclusive. Attached is a table listing assisted housing developments in the St. Clair County Participating Jurisdiction with contracts expiring during the timeframe covered by this consolidated plan (2025-2029).

Similarly, HUD provides Low Income Housing Tax Credit (LIHTC) database that documents development projects along with the year the projects were placed in service. The Illinois Housing Development Authority (IHDA) has an initial 15-year compliance period for projects financed with LIHTC, after which owners of LIHTC properties have an option to exit the program without continued affordability restrictions. While projects may remain affordable after the initial compliance period - especially in weaker market areas where market rate rents and affordable rents are similar - IGD will monitor LIHTC projects expected to reach the end of their compliance period during the timeframe covered by this consolidated plan (2025-2029). The LIHTC projects which will reach the end of their compliance period covered by this consolidated plan are all located within the City of East St. Louis and are listed in the table below. The LIHTC projects which will reach the end of their compliance period covered by this consolidated plan are all located within the City of East St. Louis and are listed in the attached table.

LIHTC projects which will reach the end of their compliance period covered by this consolidated plan are all located within the City of East St. Louis and are listed in the attached table.

### **Does the availability of housing units meet the needs of the population?**

There is an overall need for affordable housing options, especially the preservation and rehab or existing homes.

Additionally, there are sharp contrasts in the economic status of St. Clair County residents and the availability of safe, quality, affordable housing options in different communities. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while in other communities, such as Belleville, Fairview Heights, and O'Fallon, have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

The American Bottoms communities have become economically distressed over the past 50 years as more affluent residents moved from the bottoms to the bluffs and to nearby Missouri communities. The African-American population is mostly concentrated in the American Bottoms in and around East St. Louis and collar communities. This is one of the largest minority concentrations in the State of Illinois. This area has been significantly affected by the exodus of many middle-class and affluent minority households migrating to formerly all-white or majority-white suburban communities. Consequently, the bottom communities suffer from disinvestment, few economic opportunities, a disproportionate number of poor residents and a housing stock that has increasingly become housing of last resort. As has been the case in similar situations across the nation, the disinvestment has also resulted in a lack of resources in affected school districts and a decline in positive perceptions of the affected communities.

#### **Describe the need for specific types of housing:**

While some specific communities within St. Clair County are in need of either more rental housing or more homeownership opportunities, the most critical housing needs in St. Clair County are related to housing cost burden/affordability, continued home repair and maintenance, and accessibility improvements for existing structures.

From 2010 to 2019, St. Clair County saw population decline of close to four percent. While this is not the same pace that the metro area has grown during that time (close to one-half percent), it shows that the population of St. Clair County will likely continue to decline slowly or remain stagnant throughout the timeframe covered by this consolidated plan (2025-2029). Like most places experiencing population decline St. Clair County has challenges in attracting the development of new homes. Active listings of new construction single-family homes over the course of the past year represent 12% to 15% of all homes available to purchase, with the overwhelming majority of homes sold being existing dwellings. During this same time, homes on average sold for 99.1% of the listed price. 2024 saw sales of 2,817 single family homes in St. Clair County, with an average sales price of \$205,000 according to Redfin and the median value of owner-occupied housing units for the county is \$164,556 an increase of 2.3% over the past year. That same year, only 292 building permits for single family homes were recorded during the US Census Building Permit Survey, showing that the average St. Clair County homeowner owns a home that is likely worth less than the median selling price for homes on the market, is likely deferring needed maintenance, and if the homeowner were to sell, they may not get the asking price for the home that they are seeking.

These economic conditions are challenging as St. Clair County works to attract developers and new residents, with little market provisions to address special-needs populations. Around one fifth of all people in St. Clair County public housing, as well as on wait-lists for housing and vouchers, have a disability (including being elderly), and there are next to no market opportunities for single family housing. The relatively low

population density of the County (approximately 391.4 people per square mile in 2020) and largely suburban / rural nature of the County does not provide adequate availability for special-needs populations to move into multi-family housing (only 13% of all properties in the County contain five or more units). St. Clair County does not receive ESG and HOPWA to directly address homeless and non-homeless special needs populations, relying on partnerships to help house those populations. With the number of building permits being so low, we know that basic maintenance accessibility improvements for existing structures are not happening at the rate they need to be in order to serve the general population, and special-needs populations without the income to secure safe and stable housing are even more vulnerable. Since we know that these populations have limited income and there are only 6,031 housing units affordable to renters making less than 30% AMI, we can recognize this as a need that requires additional intervention to be properly addressed.

#### **Discussion**

N/A

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

N/A

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2016-20	% Change
Median Home Value	120,400	134,800	12%
Median Contract Rent	589	648	10%

Table 29 – Cost of Housing

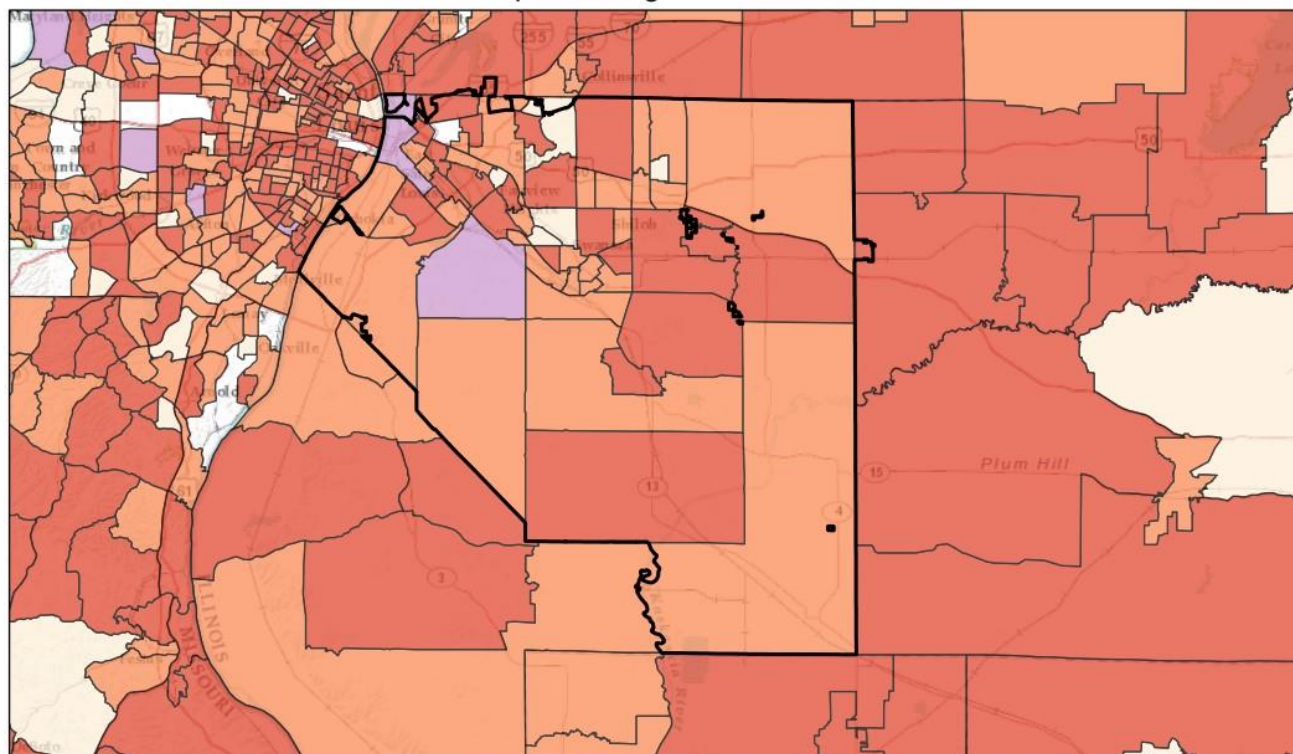
Data Source: 2009 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	10,837	31%
\$500-999	18,561	53%
\$1,000-1,499	3,994	11%
\$1,500-1,999	1,020	3%
\$2,000 or more	689	2%
<b>Total</b>	<b>35,101</b>	<b>100%</b>

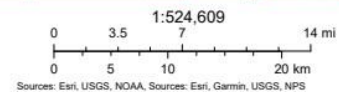
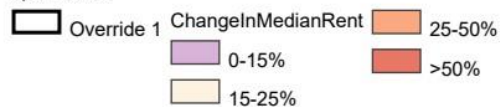
Table 30 - Rent Paid

Data Source: 2016-2020 ACS

# CPD Maps - Change in Median Rent -



April 14, 2025



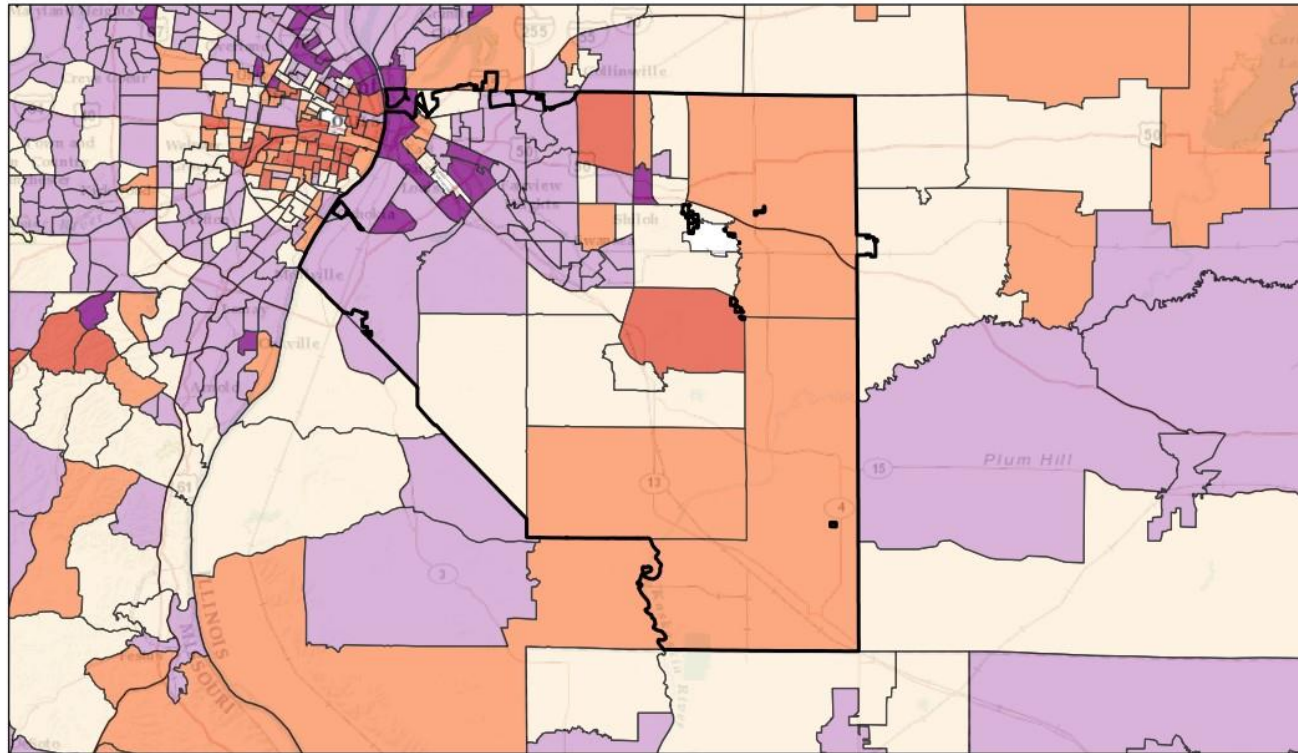
## CPD Maps - Change in Median Rent

Consolidated Plan

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# CPD Maps - Change in Median Home Value -



April 14, 2025

  Override 1  
 ChangeInMedianHomeValue  
 <20%  
 20-50%  
 50-75%  
 75-100%  
 >100%

1:524,609  
 0 3.5 7 14 mi  
 0 5 10 20 km  
 Sources: Esri, USGS, NOAA, Sources: Esri, Garmin, USGS, NPS

CPD Maps - Change in Median Home Value

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	6,031	No Data
50% HAMFI	17,364	11,979
80% HAMFI	26,884	25,048
100% HAMFI	No Data	32,860
Total	50,279	69,887

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

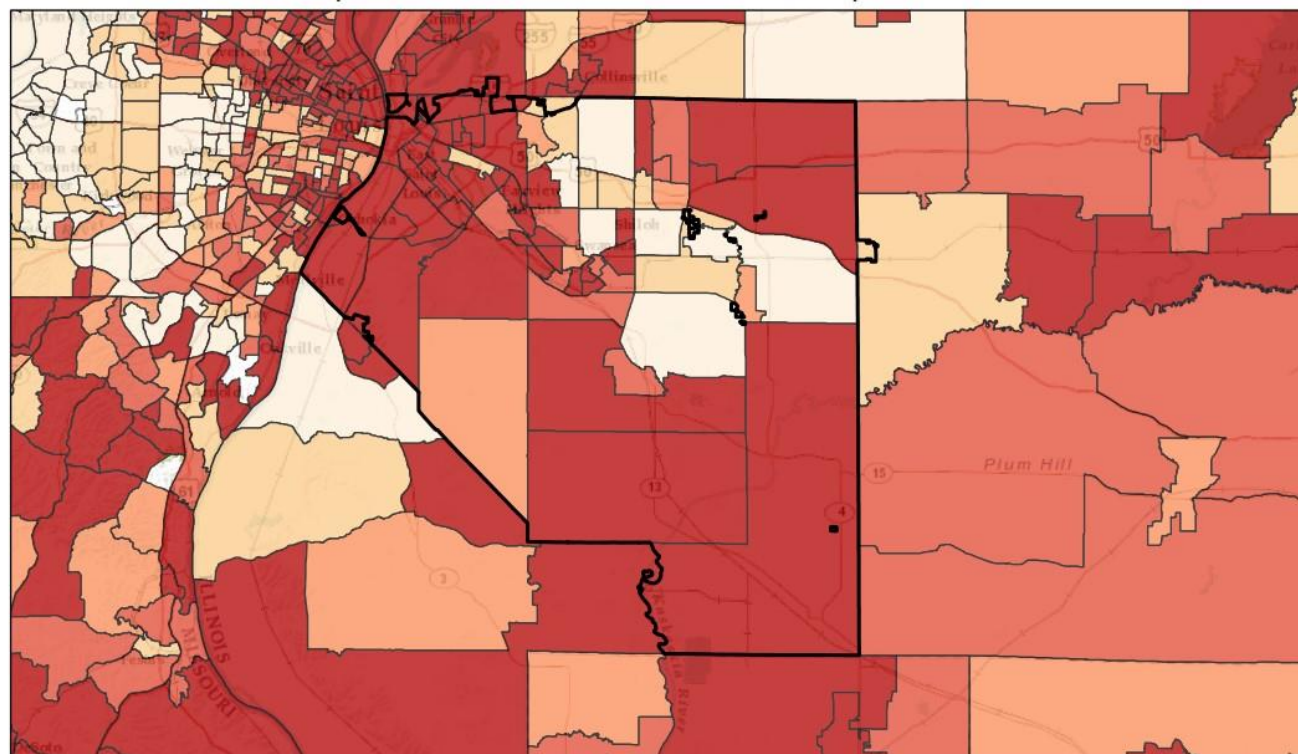
Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	928	972	1,209	1,565	1,818
High HOME Rent	928	972	1,209	1,564	1,818
Low HOME Rent	903	968	1,161	1,341	1,497

Table 32 – Monthly Rent

Alternate Data Source Name:  
HUD HOME Rent Limits for the St. Louis Metro Area: [https://www.huduser.gov/portal/datasets/home-datasets/files/HOME\\_RentLimits\\_State\\_MO\\_2024.pdf](https://www.huduser.gov/portal/datasets/home-datasets/files/HOME_RentLimits_State_MO_2024.pdf)  
Data Source Comments:

CPD Maps - Percent of Rental Units Available up to 50% HAMFI -



April 14, 2025

Override 1

RenterUnitsTo50PercentHAMFI

<10%

10-20%

20-30%

30-40%

>40%

1:524,609  
0 3.5 7 14 mi  
0 5 10 20 km  
Sources: Esri, USGS, NOAA, Sources: Esri, Garmin, USGS, NPS

CPD Maps - Percent of Rental Units available up to 50% HAMFI

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### **Is there sufficient housing for households at all income levels?**

As is the case in many communities, there is not sufficient housing for renter households at the less than 30% AMI income level. There are 6,031 housing units affordable to renters making less than 30% AMI, but according to HUD CHAS data for 2017-2021 there are 10,440 renter households at that income level. Renter households at this income level are incredibly difficult to house. It is estimated that a four-person household making 30% of AMI (according to 2025 HUD Income Limits) can afford monthly rent of approximately \$836, which is below the HOME rents for even an efficiency apartment. Although the data shows that there are technically enough affordable units available for renter households at 30%-50% or 50%-80% AMI, it is likely that some of these units are currently being occupied by households at <30% AMI and that additional affordable units at a variety of price points are needed. Furthermore, the map above showing the percent of rental units affordable to households making 50% AMI demonstrates that even when affordable rental housing is available, it is not uniformly available in all communities, and there may be a lack of affordable rental housing in areas of high opportunity (with access to jobs, services, high quality schools, etc.)

Additionally, HUD data shows that there are 5,730 owner households making less than 30% AMI. Although very few – if any – homes would be affordable to these households were they to try and purchase a new home in St. Clair County, it is likely that many of these households have paid off their mortgage and own their home in full (senior citizens living alone are an example of who might fall into this category of home owners making less than 30% AMI). For these owner households making less than 30% AMI, home repair programs that allow them to perform needed maintenance are critical to ensure there is sufficient housing available.

### **How is affordability of housing likely to change considering changes to home values and/or rents?**

As shown in the table above, median home values and rents have increased by 12% and 10%, respectively, in St. Clair County over the past fifteen years. Additionally, data from CPD maps indicates that increases in median home values and rents have occurred throughout the County, including in weaker market areas where housing values remain low and housing development is difficult to incentivize.

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Approximately 31% of all renter households pay under \$500 per month in rent while Fair Market Rent starts at \$928 for an efficiency apartment. Additionally, over three-fourths (84%) renter households in St. Clair County pay less than \$1,000 per month for rent. These households are likely

renting units of varying sizes, including three (3) bedroom (or larger) units. However, the Fair Market Rent for a three (3) bedroom unit is \$1,570 per month, more than the vast majority of renter households (95%) are currently paying.

In other words, as is the case in many communities within the St. Louis, MO-IL Metro Area (the area for which Fair Market Rents are calculated), affordable housing rents are similar to market rate rents. As such, in many areas of St. Clair County, strategies focused on the preservation of existing affordable rental housing will often be more appropriate than strategies focused on the production of new affordable rental housing (since new affordable rental housing will not necessarily offer a lower cost housing option than the private market.) Additionally, affordable market rate rents allow St. Clair County to focus on strategies that preserve affordable home ownership: for example, home improvement assistance programs are in high demand and were cited during public meetings as high priority needs.

In areas or situations where affordable rental housing development is appropriate – for example, to increase rental housing quality and safety, replace functionally obsolete housing, catalyze private market investment, and provide affordable rental options in stronger-market, high-opportunity communities – the Illinois Housing Development Authority offers financing tools for rental housing preservation and production to private developers.

#### **Discussion**

N/A

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

N/A

### Definitions

"Substandard" housing units are defined in the CHAS data, and therefore in this Consolidated Plan, as housing units without complete kitchen or plumbing facilities. In St. Clair County, according to the 2016-2020 American Community Survey, approximately 0.3% of occupied housing units lack complete plumbing facilities. Approximately 0.7% of occupied housing units lack complete kitchen facilities. However, it is important to note that some housing units with complete kitchen and plumbing facilities may still require substantial rehabilitation or home repair efforts in order to ensure that they are decent, safe and sanitary homes.

The determination of whether or not a substandard housing unit is suitable for rehabilitation is made on a case-by-case basis.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	12,839	19%	14,878	42%
With two selected Conditions	151	0%	1,025	3%
With three selected Conditions	24	0%	4	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	53,659	80%	19,303	55%
<b>Total</b>	<b>66,673</b>	<b>99%</b>	<b>35,210</b>	<b>100%</b>

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	13,017	20%	6,337	18%
1980-1999	16,142	24%	9,489	27%
1950-1979	23,727	36%	13,957	40%
Before 1950	13,810	21%	5,491	16%
<b>Total</b>	<b>66,969</b>	<b>101%</b>	<b>35,274</b>	<b>101%</b>

**Table 34 – Year Unit Built**

Data Source: 2016-2020 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	37,537	56%	19,448	55%
Housing Units build before 1980 with children present	7,289	11%	4,346	12%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020ACS (Total Units) 2016-2020 CHAS (Units with Children present)

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	8,445	5,630	14,075
Abandoned Vacant Units	2,815	2,815	5,630
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

**Table 36 - Vacant Units**

Alternate Data Source Name:  
2023 ACS 5-year estimates DP04

**Data Source Comments:**

Vacant units are produced by ACS table DP04. The vacant units are not broken down into other categories, including abandoned or suitable for rehabilitation. Using the 2010 Census ratios as a benchmark (the 2010 dataset breaks down vacant properties from abandoned, coded as "other"), we can safely assume that 60% of all vacant properties are suitable for rehabilitation, 20% are abandoned and suitable for rehabilitation, and the remaining 20% are abandoned and not suitable for rehabilitation. While there is no county wide source for whether vacant units are suitable or not suitable for rehabilitation, vacant units that are for rent/sale/seasonal use are likely already livable or suitable for rehabilitation. However, vacant units that are estimated as being abandoned may not be suitable for rehabilitation as units that have been vacant for a long time are often damaged by vandals or open to the elements. We estimate that these buildings may have a 50/50 chance of being suitable for rehabilitation. The ultimate suitability of a building for rehabilitation depends on many factors, including condition, building type, architectural significance, and available financing tools.

**Need for Owner and Rental Rehabilitation**

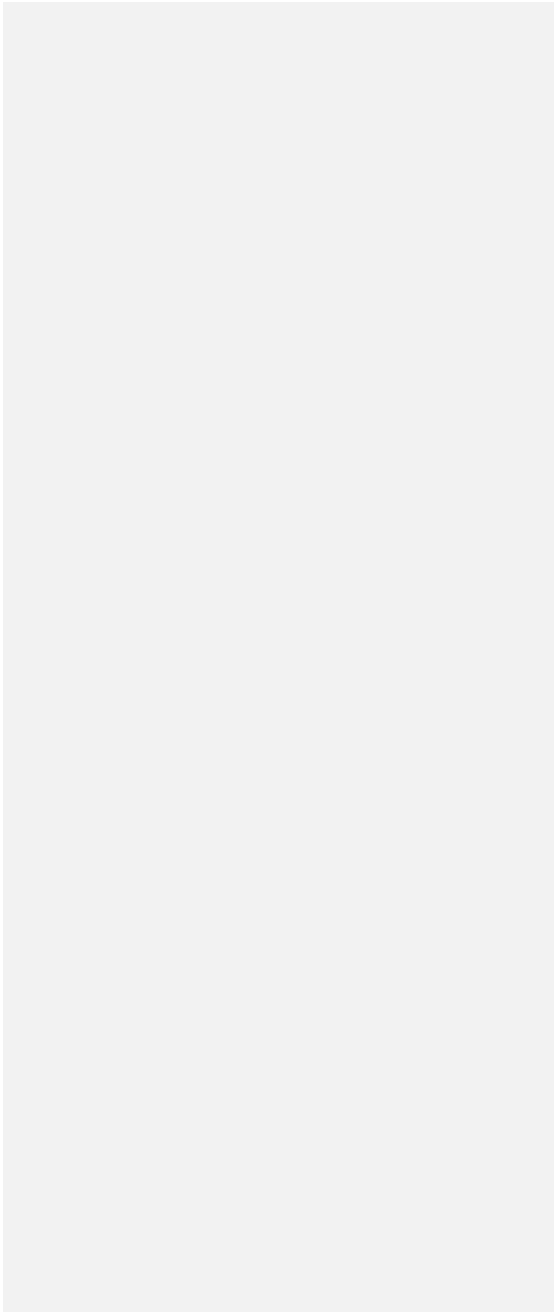
Housing rehabilitation is a challenge for most low-income households who generally do not have the funds available to do the necessary maintenance and upkeep. Given the high number of housing units with one or more selected conditions (13,014 owner-occupied units and 15,907 renter-occupied units) as well as the high number of housing units built before 1980 (37,537 owner-occupied units and 19,448 renter-occupied units), there is a clear need for housing rehabilitation programs in St. Clair County. Housing rehabilitation programs:

- Improve the quality of life for low-income persons by providing financial assistance for home repair, allowing the home to meet St. Clair County Housing Maintenance Standards;
- Stabilize affordable housing stock in existing neighborhoods;
- Mitigate housing barriers for elderly and disabled persons;
- Promote neighborhood revitalization and enhancement;
- Help to foster and maintain affordable housing and allow low-moderate income citizens to remain in homes that may otherwise deteriorate to level where the home is no longer habitable

**Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards**

There is still a significant need to reduce lead-based hazards in St. Clair County. St. Clair County has a higher rate of elevated blood lead levels than the United States as a whole. Furthermore, over 50% of St. Clair County housing units are at risk for lead-based paint hazards. Among housing units home to households with children age six and under, over 11,000 are at risk for lead-based paint hazards.

**Discussion**



## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

### Totals Number of Units

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			431	2,165	0	0	0	95	0
# of accessible units			41						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 37 – Total Number of Units by Program Type

**Alternate Data Source Name:**

St. Clair County Housing Authority Data

**Data Source Comments:**

### Describe the supply of public housing developments:

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The St. Clair County Housing Authority (SCCHA) administers all public housing units in St. Clair County, except for those located in the City of East St. Louis, which are operated by the Housing Authority of the City of East St. Louis (HAESL).

SCCHA operates approximately 970 public housing units, located in four (14) different municipalities.

Most of SCCHA's public housing stock, which was built in the 1960's and 1970's, is now more than fifty (50) years old. The physical / capital needs of the public housing stock are great, far exceeding the monies made available annually through the Public Housing Capital Fund Program (CFP). The physical improvement needs vary by specific property but are generally common to those needed by any aging multi-family residential housing stock - new roofs, windows, exterior doors, furnaces, water heaters, air conditioning units, along with upgraded electrical and plumbing systems and accessibility improvements needed to comply with Section 504.



## Public Housing Condition

Public Housing Development	Average Inspection Score
AMP 1 (Brooklyn - Thomas Terry Apts)	75
AMP 2 (Centreville - Private Mathison Manor)	62
AMP 3 (Centreville - Ernest Smith Sr. Apartments)	68
AMP 4 (Belleville / Swansea properties)	97
AMP 5 (Washington Park, O'Fallon and Lebanon properties)	62
AMP 6 (Marissa, Lenzburg, New Athens, Smithton, Millstadt, and Dupo properties)	86

**Table 38 - Public Housing Condition**

## Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Over the years, SCCHA has given priority to completing improvements to the exterior building envelopes to ensure structural integrity and maintain a modicum of curb appeal. SCCHA has also focused capital repairs to address the deficiencies that have the most negative impact on the scoring methodology used by HUD in its periodic REAC (Real Estate Assessment Center) inspections. As a result, the interiors of most units in the SCCHA inventory are in dire need of renovation (floor coverings, doors, kitchens, bathrooms, etc.).

In 2021, SCCHA requested and received HUD approval for the demolition of fifty-two (52) public housing units in Centreville (Ernest Smith Sr. Apartments ---ESSA). The relocation of all tenants was executed successfully. In response to the diminished availability of housing units, we have expanded our Project Based Vouchers across the community to assist partners engaged in the construction of affordable housing developments. These initiatives align with the SCCHA Annual Plan, which aims to either preserve current affordable housing options or encourage the creation of new ones.

SCCHA has selected a Housing Development Partner and is in the final stages of converting its properties in Lebanon and O'Fallon (Silver Creek) to ensure the sustainability of its public housing portfolio. This transition involves the conversion of public housing properties under the Rental Assistance Demonstration (RAD) program. The completion of this conversion process is anticipated by mid-2025.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

St. Clair County will help address the needs of public housing and its residents by:

- Making grant monies available to assist residents with rent, security deposits, utility bills and other services when available.
- Making grant monies available for infrastructure improvements (roads, sewers, etc.) and physical improvements to public housing units (i.e. weatherization) subject to fund availability and competing needs.

SCCHA will continue to support Public Housing Resident Councils and the Resident Advisory Board, which plays an important role in the development and annual update of its Agency Plan.

Additionally, planned physical improvements to address the restoration and revitalization needs listed above will also improve the living environment of low- and moderate-income families residing in public housing.

**Discussion:**

Approximately nineteen (19) percent of the households on the wait lists (Public Housing and Section 8 HCVP) indicate that they have a disability, including being elderly. Computer software does not permit the extrapolation of exact numbers, but staff insight gained from experience indicates that the most common declared disability is in the “other” category. Many, if not most of these are related to mental health. “Mobility” impairment is the second most declared disability / accessibility. The majority of these cases do not equate to the need for fully accessible units, but rather more commonly a need for a ground floor unit due to the inability to climb stairs on a regular basis due to health issues. There is considered to be a relatively low level of need for fully-accessible units related to wheel-chair use (estimated at five percent (5%) of less of current applicants). Vision and hearing impairments are the least declared disabilities among applicants ---estimated at two percent (2%) or less of the applicant pool and, again, many of these applicants are not seeking or in need of units that have been modified with accessibility features to accommodate their disability. They simply note their disability on the application form.

The public housing resident population is reflective of the applicant pool. Approximately twenty percent (20%) report having a disability. The percentage breakdown between “other”, mobility, vision and hearing is found by staff to be very similar to applicant population.

SCCHA is operating under a Section 504 / ADA Accessibility Self-Evaluation and Accessibility Transition Plan that was professionally completed in September 2012. Most exterior areas at public locations have already been modified to meet ADA accessibility standards. Where the work has not yet been completed, it is planned for completion within the next one to three years, subject to fund availability. SCCHA's overall housing inventory meets the minimum of five percent (5%) of units accessible to households with mobility impairments and two percent (2%) of units with modifications to accommodate applicants with vision and hearing impairments. As stated earlier, most of SCCHA's public housing inventory was built more than forty (40) years ago, when accessibility requirements were for the most part non-existent. Over the years, when SCCHA completed substantial renovations at a public housing property, it provided for the required accessibility standards. Unit conversions / modifications are "projected" under SCCHA's Transition Plan at locations that have not yet undergone substantial rehabilitation. The previously "projected" work was placed under contract effective April 2020 and is scheduled to be completed by the end of the year. In addition to maintaining the required number of accessible units in its overall inventory, SCCHA, as required by law, responds to individual resident requests for reasonable accommodation for unit modifications related to their disability. This is done on an on-going basis, with each request being reviewed on a case-by-case basis. SCCHA has demonstrated its commitment to meet the accessibility needs of current residents in any manner reasonably possible.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

N/A

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	42	122	107	349	0
Households with Only Adults	22	0	35	185	0
Chronically Homeless Households	0	0	0	41	0
Veterans	13	0	15	78	0
Unaccompanied Youth	2	0	4	0	0

Table 39 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:  
2024 Housing Inventory Count  
Data Source Comments:

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Many mainstream services in St. Clair County are coordinated through the St. Clair County Community Services Group. The Community Action Agency Board (CAA), which is supported by IGD acts as an advisory board for those services. IGD provides a meeting place and clerical services for the CAA and the IGD Director serves as staff to the board. Through IGD's Community Services 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 complement those specifically targeted to homeless persons through the Continuum of Care, and 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, weatherization, information, and referrals. IGD's Workforce Development Group currently coordinates the Workforce Innovation & Opportunity Act (WIOA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties and provides employment and training services to those counties. The Mid America Workforce Investment Board serves as a governing body for those services.

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:

- Illinois Department of Human Services
- Catholic Urban Program
- Lessie Bates-Davis Neighborhood House
- East St. Louis Housing Authority
- St. Clair County Housing Authority
- Homeless Action Council
- Programs and Services for Older Persons (Southwestern Illinois College)
- Living Independently Now Center (LINC), Inc.
- American Red Cross
- Beacon of Belleville
- St. Clair County Court Appointed Special Advocate (CASA)
- Okaw Valley Council Boys Scouts of America
- Urban League of Metropolitan St. Louis

- Illinois Division of Employment Security One-Stop Centers
- Workforce Investment Group
- St. Clair County Workforce Development Group
- St. Clair County Mental Health Board
- St. Clair County Veterans Assistance Commission

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

IGD's formalized collaborations with the Homeless Action Council and Community Action Agency, along with a wide variety of service providers, allow for IGD to effectively facilitate service delivery despite not having control over the existing landscape of service providers. IGD continues to work to discover and recruit new non-profit organizations to the Homeless Action Council.

Homeless persons and families have received housing through St. Clair County Housing Authority programs, Hoyleton Youth and Family Services, HUD Continuum of Care Programs, and other Supportive Housing Programs.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

The following are St. Clair County Housing Authority housing developments located within St. Clair County cities that are currently available for non-homeless persons with special needs. The code "WHV" indicates that a unit has accessibility features to accommodate needs of people with wheelchairs (W), hearing impairments (H), or vision impairments (V).

IL30-16 Belleville (Bel-Plaza I & II) has (86) Elderly Only units

IL30-18 Swansea (Fullerton Road Apts.) has (18) Elderly Only units

IL30-21 New Athens (Rickert Station) has (16) Elderly Only units

IL30-27 Belleville has (Amber Court) has (64) Elderly Only units

IL30-13 New Athens (Becker Park) has (4) 1 bedroom Non-Elderly Disabled Only units

IL30-14 Lebanon (Gardenwood Apartments) has (4) 1 bedroom Non-Elderly Disabled Only units

IL30-19 Lenzburg (Lakeview Apartments) has (4) 1 bedroom Non-Elderly Disabled Only units

IL30-17 Washington Park (Washington Park Apartments) has (20) 1 bedroom Non-Elderly Disabled Only units

IL30-3 Dupo (Bluffside Apartments) has (6) Mixed Population units

IL30-5 Smithton (Smithton Apartments) has (6) Mixed Population units

IL30-7 Marissa (Clayton Manor) has (14) Mixed Population units

#30-1 Brooklyn (part of Thomas Terry Apartments) has (16) 1 bedroom Family units (5) units w/WHV

#30-9 Brooklyn (part of Thomas Terry Apartments) has (8) 1 bedroom Family units (2) units w/W

#30-10 Centreville (Part of Private Mathison Manor) has (11) 1 bedroom Family units (2) units w/WHV & (4) units w/W

#30-11 Alorton has (Hawthorne Terrace) (6) 1 bedroom Family units (2) units w/WHV & (2) units w/HV

#30-12 Brooklyn (part of Thomas Terry Apartments) has (4) 1 bedroom Family units

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Special needs persons generally face two key challenges: the challenge of finding quality affordable housing and the challenge of finding appropriate supportive services. Objectives for affordable housing for special needs persons overlap with the objectives for affordable housing for very low, low, and moderate-income residents, and the objectives for supportive services for special needs persons overlap with the objectives for supportive services for other at-risk populations.

#### **Housing Needs**

Special needs persons often face the same sorts of housing challenges as very low, low- and moderate-income residents. The availability of quality affordable housing can give special needs persons the ability to focus their energy and resources on obtaining the supportive services they require.

#### **Supportive Service Needs**

Although special needs persons are generally not homeless, they do require some of the same sorts of supportive services that IGD coordinates through the Housing Resource Center, the Homeless Action Council, and the St. Clair County Continuum of Care. Specifically, the following supportive service strategies will be of benefit to non-homeless special needs persons:



- Continue to maintain and utilize the Homeless Management Information System (HMIS) for tracking population and services, minimizing duplication of effort, and maximizing the distribution of homeless prevention funds to needy individuals and families. Despite the name, the HMIS tracks supportive services received by non-homeless persons and households who may be at risk for homelessness due to extenuating circumstances, such as disability, domestic violence, or substance abuse.
- Administer Low-Income Home Energy Assistance Program (LIHEAP) funding to assist low-income households in paying home energy bills, in order to make housing temporarily more affordable.
- Utilize Community Services Block Grant (CSBG) funding to provide rental, deposit, and mortgage assistance.
- Partner with private nonprofits through the Housing Resource Center and the Homeless Action Council to connect special needs population with services such as prescription assistance, meal assistance, and short-term specialized care.
- Coordinate with the Veteran's Assistance Center to refer clients, allowing them access to services offered by each agency.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

St. Clair County does not receive McKinney-Vento funds for its Continuum of Care activities. Nonetheless, the jurisdiction does have policies and protocols in place for the discharge of persons from publicly funding institutions or systems of care in order to prevent such discharge from immediately resulting in homelessness for such persons. In general, each institution or system of care follows the relevant state-mandated discharge policy, as described briefly in the next paragraph.

Foster care facilities follow the Illinois Department of Children and Family Services (DCFS) discharge protocol, disseminated to all Continua of Care in the State in 2007. The Protocol enumerates four services funded by the state to prevent youth from becoming homeless upon being emancipated and/or aging out of foster care. The services include housing advocacy, start-up grants, housing subsidies, and cash assistance. Health care facilities follow the Illinois Administrative Code for health care institutions, which specifies that skilled nursing and intermediate care facilities complete a comprehensive assessment of patient needs and ensure that all persons with psychiatric disabilities receive discharge planning that ensures appropriate housing or community placement upon release. Mental health facilities work to ensure stable housing options prior to discharge and can utilize the non-profit agency and Continuum of Care member Call for Help, which provides 40 beds for persons leaving higher levels of care who otherwise would be homeless. Corrections facilities follow the Illinois Department of Corrections Discharge Protocol, implemented in 2002, that requires a release plan, including the address where the released offender will reside, be developed and approved for each offender prior to release.

Systems such as the HMIS, resources such as HCAC and Call for Help's referral program, and the monthly meetings of Continuum of Care committees, help ensure a cohesive, community-wide approach to ensuring discharged persons do not become immediately homeless.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

#### **Housing Needs**

To meet the affordable housing needs of its special needs populations, St. Clair County plans to continue using a portion of the St. Clair County, City of Belleville and City of East St. Louis CDBG funding to provide loans and grants to owner-occupants for home repairs (including emergency home repairs) and home improvements (including accessibility improvements).

All eligible persons (i.e. elderly, special needs, homeless, small families and large families) throughout St. Clair County may seek assistance for any of the above- mentioned programs.

#### **Supportive Service Needs**

To meet supportive service needs, IGD will continue to coordinate appropriate services through the Housing Resource Center, the Homeless Action Council, and the St. Clair County Continuum of Care.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Homelessness Prevention Services: Counseling/Advocacy, Legal Assistance, Mortgage Assistance, Rental Assistance, Utility Assistance

Street Outreach Services: Law Enforcement, Mobile Clinics, Other Street Outreach Services

Supportive Services: Alcohol & Drug Abuse, Child Care, Education, Employment and Employment Training, Healthcare, HIV/AIDS, Life Skills, Mental Health Counseling, Transportation

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

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, residential investment in the American Bottoms area is threatened due to uncertainties over future flood insurance requirements. The Southwestern Illinois Flood Prevention District Council (FPD Council) was formed in July 2009 by Madison, Monroe and St. Clair counties in direct response to the Federal Emergency Management Agency's (FEMA) announcement of its intention to de-accredit the 74-mile levee system protecting the St. Louis Metro East region. FEMA's decision would effectively designate substantial portions of the American Bottom area of Southwestern Illinois as a Special Flood Hazard Area (SFHA) on new flood insurance rate maps. If issued as final maps, this classification would require all property owners – residents and businesses – to purchase flood insurance in order to get a mortgage. In order to address this potential challenge, regional leaders successfully sought authorization from the Illinois General Assembly to impose a ¼ percent sales tax to pay for any necessary improvements to the levee system and created independent Flood Prevention Districts (FPDs) within each county with the authority to collect the tax. 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.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

N/A

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	413	415	1	1	0
Arts, Entertainment, Accommodations	11,661	9,469	15	18	3
Construction	3,905	3,087	5	6	1
Education and Health Care Services	17,236	9,206	23	17	-6
Finance, Insurance, and Real Estate	5,360	2,225	7	4	-3
Information	1,442	595	2	1	-1
Manufacturing	6,800	4,074	9	8	-1
Other Services	3,434	2,458	5	5	0
Professional, Scientific, Management Services	7,497	5,205	10	10	0
Public Administration	0	0	0	0	0
Retail Trade	10,172	10,832	13	20	7
Transportation and Warehousing	4,272	3,824	6	7	12
Wholesale Trade	3,184	1,924	4	4	-0
Total	75,376	53,312	--	--	--

**Table 40 - Business Activity**

**Data Source:** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

**Labor Force**

Total Population in the Civilian Labor Force	125,061
Civilian Employed Population 16 years and over	118,180
Unemployment Rate	5.39
Unemployment Rate for Ages 16-24	15.21
Unemployment Rate for Ages 25-65	3.54

**Table 41 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	26,147
Farming, fisheries and forestry occupations	4,077
Service	14,162
Sales and office	26,314
Construction, extraction, maintenance and repair	8,687
Production, transportation and material moving	7,631

**Table 42 – Occupations by Sector**

Data Source: 2016-2020 ACS

**Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	69,895	66%
30-59 Minutes	30,544	29%
60 or More Minutes	5,229	5%
<b>Total</b>	<b>1105,668</b>	<b>100%</b>

**Table 43 - Travel Time**

Data Source: 2023 ACS 5-Year Estimates

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,882	4896	4,278
High school graduate (includes equivalency)	21,486	1,688	10,669
Some college or Associate's degree	34,970	1,677	8,629
Bachelor's degree or higher	34,499	846	5,850

Table 44 - Educational Attainment by Employment Status

Data Source: 2023 ACS 5-Year Estimates Table B23006

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	557	390	597	1,253	2,065
9th to 12th grade, no diploma	3,030	1,440	1,703	3,929	3,068
High school graduate, GED, or alternative	7,748	8,437	7,921	18,854	13,015
Some college, no degree	6,136	8,892	7,231	16,866	9,527
Associate's degree	1,335	4,218	3,264	7,395	3,207
Bachelor's degree	1,751	6,490	6,152	11,712	4,792
Graduate or professional degree	179	3,206	5,148	8,066	4,351

Table 45 - Educational Attainment by Age

Data Source: 2016-2020 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	29,365

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
High school graduate (includes equivalency)	34,192
Some college or Associate's degree	43,206
Bachelor's degree	62,255
Graduate or professional degree	79,615

**Table 46 – Median Earnings in the Past 12 Months**

**Alternate Data Source Name:**

2023 ACS 5-year estimates Table S2001

**Data Source Comments:**

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

Major employment sectors based on the share of jobs and workers include Education and Health Care Services; Arts, Entertainment, and Accommodations; and Retail Trade.

Retail Trade, in particular, has a greater number of jobs than workers, implying that workers likely commute to St. Clair County from other areas for Retail Trade jobs. The Transportation and Warehousing sector also has a greater number of jobs than workers in St. Clair County.

**Describe the workforce and infrastructure needs of the business community:**

Continued workforce training initiatives and improvements in transportation infrastructure will help meet the needs of the business community. Businesses also benefit from Workforce Innovation & Opportunity Act (WIOA) programs which provide:

- Information about local labor pool
- Information about local training programs and services
- Access to trained workers
- Tax credits and other information

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

St. Clair County continues to invest in transportation infrastructure and to assist businesses, realtors and site selection consultants in attracting new business and industry to the County. St. Clair County works closely with the Illinois Department of Commerce & Economic Opportunity and regional allies to market the County and region. Recent infrastructure changes that will have an economic impact on communities within St. Clair County include the completion and opening of the Stan Musial Veterans Memorial Bridge across the Mississippi River between St. Clair County, Illinois, and the city of St. Louis, Missouri.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

There is a continued need for programs, such as those provided via the WIOA, to assist the current workforce in developing marketable skills to take advantage of employment opportunities in St. Clair County. WIOA programs:

- help all persons access free information and orient themselves to the local labor market
- help dislocated workers return to productivity, often at wages similar to what the worker earned prior to their layoffs
- help young people get ready for work and careers by providing the basic education, work readiness, work experience and job skills they need
- help unemployed or underemployed workers receive skills through job training that will help those individuals succeed in the job market

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

IGD's Employment and Training (ET) Group currently coordinates the Workforce Innovation & Opportunity Act (WIOA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties. Local Workforce Innovation Area (LWIA) #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:

- 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 (operated by Southwest Illinois College),
- Illinois Department of Human Services (TANF),
- Illinois Department of Human Services (ORS),
- Illinois Department of Employment Security, and
- Members of local businesses that represent local hiring opportunities, which make up a majority of the Workforce Investment Board.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

Yes. The Intergovernmental Grants Department Executive Director is also the County's Economic Development Director and has several CEDS projects in the pipeline including potential Economic Development activities for infrastructure of projects associated in the Mid America Enterprise Zone as well as continued work with projects in the American Bottoms Enterprise Zone.

In addition to the IGD WIOA programs described above, the St. Clair County Comprehensive Plan, published in 2011, identifies several economic development strategies:

- Reserve portions of the Kaskaskia River corridor for industrial use and direct appropriate industrial growth to the corridor
- Recruit industries that utilize and enhance multi-modal transportation opportunities and available land
- Diversify the County's economy by attracting transportation and distribution businesses
- Direct transportation and distribution businesses to the American Bottoms to take advantage of the existing transportation infrastructure
- Correct infrastructure and environmental problems, particularly in the American Bottoms.
- Encourage redevelopment in the American Bottoms through public investments
- Develop the Mississippi Riverfront for entertainment/recreation as well as industrial/ports use

## MA-50 Needs and Market Analysis Discussion

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

There are sharp contrasts in the economic status of St. Clair County residents. Communities in the American Bottoms have widespread poverty with accompanying blight and abandonment, while those on the bluffs have extensive residential and commercial development. Eastern and southern portions of the County are essentially rural in character. Residential opportunities differ extensively, from peaceful wooded countryside homes that are beautifully landscaped, to dilapidated unsafe buildings located in areas with significant infrastructure problems.

That said, households with housing problems can be found to some degree throughout St. Clair County. As shown in the maps attached to sections NA-15, NA-20, and NA-25 above, each individual racial or ethnic group with disproportionately greater needs tends to be located within specific geographies in St. Clair County. However, each racial or ethnic group also tends to be located in different parts of St. Clair County than the others. For example, the areas with high concentrations of Hispanic households are different from the areas with high concentrations of Asian households, American Indian/Alaska Native households, or Black/African American households. The majority of communities within St. Clair County have members of racial or ethnic groups with disproportionately greater needs.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

There are three St. Clair County Racially and/or Ethnically Concentrated Areas of Poverty (R/ECAP) areas as identified by the OneSTL Fair Housing Equity Assessment. The OneSTL report defined R/ECAPs as Census Tracts consisting of 50% or higher non-white population with a family poverty rate of either (a) at least 40% or (b) at least 3 times the area's mean family poverty rate. This definition is used for both "low-income concentration" and "area of minority concentration." According to HUD data at the time the OneSTL report was produced, the St. Louis region mean family poverty rate was 10.62%, so the R/ECAPs identified below have family poverty rates of 31.86% ( $3 \times 10.62\%$ ) or higher. These are:

- The downtown East St. Louis area, consisting of Census Tracts 5009, 5011, and 5045 and including portions of East St. Louis, National City, and Brooklyn. This R/ECAP has a low population density and is crossed by both highways and railroad tracks. There are 10,942 people living in the R/ECAP.
- The Alorton/Centre ville area, consisting of Census Tracts 5025, 5027, and 5028. This R/ECAP has a relatively low vacancy rate of 10.8% compared to the other two St. Clair County R/ECAP areas.

- The Washington Park area, consisting of Census Tracts 5004, 5005, 5022, and 5024.1 and including portions of East St. Louis and Washington Park. This R/ECAP borders the Emerson Park neighborhood, which has seen significant transit-oriented development in the past 15 years, including professionally managed affordable housing and a new grocery store.

### **What are the characteristics of the market in these areas/neighborhoods?**

St. Clair County R/ECAPs have weak housing markets and face a number of significant economic pressures:

1. household housing cost burden is already high, preventing households from moving to higher rent areas outside R/ECAPs;
2. land development costs are high in low-to-moderate income neighborhoods, in part due to deteriorated infrastructure;
3. property taxes in many areas are high due to a lack of municipal tax base, discouraging development and making home ownership challenging to afford;
4. uncertainties over future flood insurance requirements and associated costs discourages development in parts of St. Clair County where R/ECAPs are located

### **Are there any community assets in these areas/neighborhoods?**

Despite high poverty and a weak housing market, there are a number of community assets and strategic opportunities in R/ECAP areas. Community assets include reasonably high access to jobs (due to the proximity to downtown St. Louis and Metrolink light rail stations), public transit accessibility, and strong neighborhood organizations, Community Development Corporations, and social service nonprofits.

### **Are there other strategic opportunities in any of these areas?**

Despite high poverty and a weak housing market, there are a number of community assets and strategic opportunities in R/ECAP areas. Proximity to public transit - especially Metrolink light rail stations - provides an opportunity for Transit Oriented Development. Vacant, relatively low-cost land provides an opportunity to incentivize private sector development activity. Strong nonprofit organizations provide an opportunity for enhanced public service delivery.

There is currently an effort underway in The City of East St. Louis to complete a Choice Neighborhood Planning grant for the neighborhood that includes the Samuel Gompers public housing development and parts of Downtown. Once the plan is complete, an application will be submitted for a Choice Neighborhood Implementation grant.

The municipality of Washington Park was recently added to an Enterprise Zone that is part of Fairmont City.

Additional strategic opportunities lie within the seven designated opportunity zones in St. Clair County, primarily in and around the city of East St. Louis.

**MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Broadband continues to be a concern to the County especially in distressed areas. The County continues to work with the Illinois Department of Commerce and Economic Opportunity to address these issues.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

St. Clair County is comprised of urban and rural areas. In the urban areas approximately 99.9 % of residents have access to 3 or more broadband internet service providers. Rural areas are slightly less at approximately 99% and may only have 2 providers to offer broadband internet. Data presents that most residents in the County would want internet connection and the wiring to obtain it. The cost of the internet service is the largest challenge for low income residents.

There is competition in St. Clair County, again most residents have 3 or more options for broadband internet providers.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

Flooding continues to be a concern associated with climate change. In fact, from July 25-28, 2025 St. Clair County experienced a flood disaster, flooding homes and businesses, causing widespread damage, overwhelming storm water and sewage systems, and forcing the evacuation of more than 300 residents. On the 26th *alone* 8.64 inches of rain fell, a value breaking the previous record of 6.85 from August 20, 1915, during the Galveston Hurricane that year. In fact, the St. Louis area exceeded its normal rainfall for July and August in that 6-hour period.<sup>2</sup> This flash event caused 94 water rescue incidents with over 150 people involved. Up to 9 inches of rain fell in a 6-to-10-hour period causing widespread flash flooding. The heaviest rain axis extended from East St. Louis southeastward towards Mascoutah. Numerous roads were flooded, including northbound I-55 at I-64, ramps from I-64 to I-255, U.S. Highway 50 between O'Fallon and Lebanon, and Illinois Route 15 near the intersection with Frank Scott Parkway. Several water rescues were performed including on Illinois Route 15 at Karch Road, east of Freeburg and on West F Street near North 3rd Street in Belleville. An estimated 600 St. Clair County households were damaged by flash flooding. HUD allocated \$30,027,000 in CDBG-DR funds to St. Clair County in response to this flood disaster, and the County is currently in the process of deploying those funds.

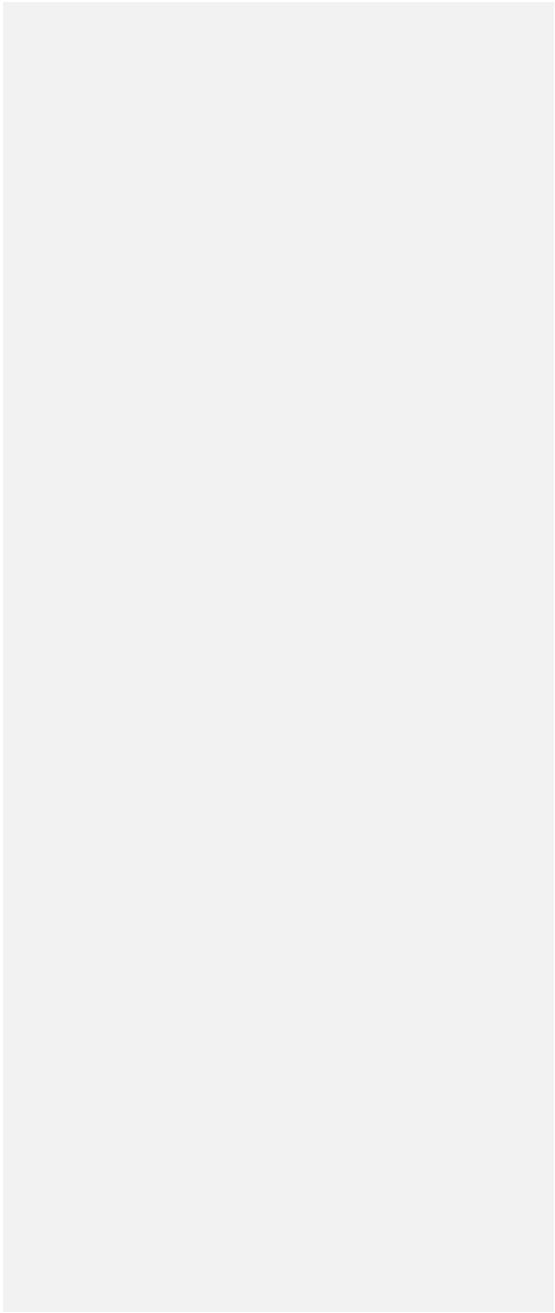
In 2025, HUD allocated \$89,533,000 in Community Development Block Grant Disaster Recovery (CDBG-DR) funds to St. Clair County in response to another major flood disaster that occurred in July of 2024. The County is currently in the process of developing its CDBG-DR Action Plan for these funds.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

At-risk low-income areas are more susceptible to damage and health related fallout due to inadequate drainage and poorly maintained pump stations.

St. Clair County Emergency Management Agency provides information for emergency/disaster preparedness to residents in the County on a regular basis. Most is listed on their Facebook page, as well as the St. Clair County website. They are responsible for the 911 emergency management system and test regularly for disaster notification. This is provided to all residents in St. Clair County including the low-income areas. The County St. Clair consults with the Southwestern Illinois Flood Prevention District Council regarding flood plain management on a regular basis. The SIFPDC council successfully sought authorization from the Illinois General Assembly to impose a ¼ percent sale tax to pay for

any necessary improvements to the levee system and created independent Flood Prevention Districts within the County to collect the tax. This has deterred FEMA from de-accrediting our levee system.



## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

For over 50 years the U.S. Department of Housing and Urban Development (HUD) has provided annual entitlement funding support to cities and urban counties with populations over 50,000 for housing and community development purposes. The amount of funding awarded is based on formulas that measure the level of need in each community and take into account such factors as population, poverty, housing overcrowding/age, and growth lag. Funding is to be used in the implementation of a multi-year housing and community development strategy and annual action plans known collectively as the Consolidated Plan.

This Consolidated Plan guides the use of federal funds granted to St. Clair County, the City of East St. Louis and the City of Belleville under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. It covers the five program years beginning October 1, 2025, through September 30, 2029. Programs and activities described in this plan are intended to primarily benefit low-income and moderate-income residents of St. Clair County, areas with majority low- and moderate-income populations, other county residents and areas through the prevention and/or elimination of slums and blight, and the County as a whole. Funds are used for activities that are eligible throughout St. Clair County. The County also uses this plan to coordinate with other federal and state grant programs and local initiatives.

Infrastructure improvements and housing will remain a primary focus of the CDBG program and maintaining single-family homeownership housing will remain the focus of the HOME program. These priority objectives were identified through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.

IGD will issue a Request for Proposals annually and rank submissions in order to determine which organizations to fund out of the identified public services/homeless/non-homeless special needs strategic plan budget. Eligible activities are expected to include homeless services, senior services, disability services, legal services, screening for lead poisoning, and housing counseling services. While IGD does not require that RFP submissions directly address the needs of non-homeless special needs populations or the housing and supportive service needs of persons who suffer from HIV/AIDS, IGD does welcome proposals from organizations throughout St. Clair County that serve these groups.



In addition to using the limited amounts of CDBG and HOME funds available, St. Clair County will continue to use other federal, state and local economic development incentives, including Tax Increment Financing, Enterprise Zones, and a variety of state and federal tax credits, for economic and residential development purposes.

St. Clair County will administer CDBG funds on behalf of the Cities of Belleville and East St. Louis. East St. Louis funds will be used only for activities conducted within the boundaries of the City of East St. Louis.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

1	<b>Area Name:</b>	East St Louis
	<b>Area Type:</b>	
	<b>Other Target Area Description:</b>	
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	Housing
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries include the entire East St. Louis area.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Housing and commercial characteristics are identified throughout the Consolidated Plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Consultation and citizen participation lead to the development of priority needs throughout
	<b>Identify the needs in this target area.</b>	Priority needs are identified and addressed throughout the ConPlan.
	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvements throughout East St. Louis are discussed throughout the ConPlan.
2	<b>Area Name:</b>	East St Louis (Area Benefit)
	<b>Area Type:</b>	Other

	<b>Other Target Area Description:</b>	Other
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries include the entire East St. Louis area.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Housing and commercial characteristics are identified throughout the Consolidated Plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Consultation and citizen participation lead to the development of priority needs throughout
	<b>Identify the needs in this target area.</b>	Priority needs are identified and addressed throughout the ConPlan.
	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvements throughout East St. Louis are discussed throughout the ConPlan.
	<b>Are there barriers to improvement in this target area?</b>	Any barriers to improvements are addressed within the ConPlan.
3	<b>Area Name:</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Area Type:</b>	Other
	<b>Other Target Area Description:</b>	Other
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	

	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries include the entire East St. Louis area.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Housing and commercial characteristics are identified throughout the Consolidated Plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Consultation and citizen participation lead to the development of priority needs throughout
	<b>Identify the needs in this target area.</b>	Priority needs are identified and addressed throughout the ConPlan.
	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvements throughout East St. Louis are discussed throughout the ConPlan.
	<b>Are there barriers to improvement in this target area?</b>	Any barriers to improvements are addressed within the ConPlan.
4	<b>Area Name:</b>	St. Clair County & City of Belleville
	<b>Area Type:</b>	Other
	<b>Other Target Area Description:</b>	Other
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries include the entirety of St. Clair County, which includes the City of Belleville.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Housing and commercial characteristics are identified throughout the Consolidated Plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Consultation and citizen participation lead to the development of priority needs throughout

	<b>Identify the needs in this target area.</b>	Priority needs are identified and addressed throughout the ConPlan.
	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvements throughout St. Clair County are discussed throughout the ConPlan.
	<b>Are there barriers to improvement in this target area?</b>	Any barriers to improvements are addressed within the ConPlan.
5	<b>Area Name:</b>	St. Clair County & City of Belleville (Area Benefit)
	<b>Area Type:</b>	Other
	<b>Other Target Area Description:</b>	Other
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries include the entirety of St. Clair County, which includes the City of Belleville.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Housing and commercial characteristics are identified throughout the Consolidated Plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Consultation and citizen participation lead to the development of priority needs throughout
	<b>Identify the needs in this target area.</b>	Priority needs are identified and addressed throughout the ConPlan.
	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvements throughout St. Clair County are discussed throughout the ConPlan.

	<b>Are there barriers to improvement in this target area?</b>	Any barriers to improvements are addressed within the ConPlan.
6	<b>Area Name:</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Area Type:</b>	Other
	<b>Other Target Area Description:</b>	Other
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	The boundaries include the entirety of St. Clair County, which includes the City of Belleville.
	<b>Include specific housing and commercial characteristics of this target area.</b>	Housing and commercial characteristics are identified throughout the Consolidated Plan.
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	Consultation and citizen participation lead to the development of priority needs throughout
	<b>Identify the needs in this target area.</b>	Priority needs are identified and addressed throughout the ConPlan.
	<b>What are the opportunities for improvement in this target area?</b>	Opportunities for improvements throughout St. Clair County are discussed throughout the ConPlan.
	<b>Are there barriers to improvement in this target area?</b>	Any barriers to improvements are addressed within the ConPlan.

### **General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

There are no Geographic Priority areas, only the entitlement communities of East St. Louis, Belleville, and St. Clair County.

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.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Public Facilities & Infrastructure Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Public Facilities Improvements Administration/Planning
	<b>Description</b>	Includes activities such as street and sidewalk improvements, improved street lighting, waterline and sewer improvements, ADA improvements, & senior and community centers.
	<b>Basis for Relative Priority</b>	Relative priorities were determined through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.
2	<b>Priority Need Name</b>	Housing Rehabilitation
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Single-Family Rehab Programs Administration/Planning



	<b>Description</b>	Includes activities such as single-family housing rehab to make homes safer, compliant with local building codes, and lead safe.
	<b>Basis for Relative Priority</b>	Relative priorities were determined through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.
<b>3</b>	<b>Priority Need Name</b>	Housing Development - New Construction
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Single-Family Housing Development Administration/Planning
	<b>Description</b>	Includes activities such as the construction of single-family homes to be sold to low-moderate income homebuyers.
	<b>Basis for Relative Priority</b>	Relative priorities were determined through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.
<b>4</b>	<b>Priority Need Name</b>	Homebuyer Down Payment Assistance
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Homebuyer Assistance Administration/Planning

	<b>Description</b>	Includes such activities as providing homebuyers with down payment and closing cost assistance to purchase affordable homes.
	<b>Basis for Relative Priority</b>	Relative priorities were determined through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.
5	<b>Priority Need Name</b>	Housing Development - Acquisition/Rehab
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Single-Family Housing Development Multi-Family Housing Development Administration/Planning
	<b>Description</b>	Includes activities such as the acquisition of derelict homes to be rehabbed and re-sold or rented to low-moderate income homebuyers and renters
	<b>Basis for Relative Priority</b>	Relative priorities were determined through a combination of data analysis, public surveys and budget exercises to determine public priorities, and staff recommendations.

### Narrative (Optional)

Note: IDIS only allows for two priority levels, high or low. All five identified priority needs listed here are of high and critical importance, and data on existing needs and market conditions support the allocation of funding to all eight priority needs. Additionally, there are two priority needs that are of higher priority than the rest (which is reflected in the amount of funding allocated to address them): public facilities & infrastructure improvements and housing rehabilitation. These priority objectives were identified through a combination of data analysis, and public surveys to determine public priorities, and staff recommendations.

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Not applicable. St. Clair County will not be providing long term Tenant Based Rental Assistance (TBRA) using CDBG or HOME funding. If such assistance were to be made available in the future, it would be based on household need and income qualifications rather than market characteristics.
TBRA for Non-Homeless Special Needs	Not applicable. St. Clair County will not be providing long term Tenant Based Rental Assistance (TBRA) for Non-Homeless Special Needs using CDBG or HOME funding. If such assistance were to be made available in the future, it would be based on household need and income qualifications rather than market characteristics
New Unit Production	St. Clair County will carefully balance two key factors before investing in new unit production: the need for affordability in a community and the strength of the housing market to support development. As the county's housing stock continues to age and deteriorate, there will continue to be a demand for new housing units, and actions may be considered to increase the percentage of homes on the market that are new construction, with 1.4% being building in 2020 or later according to the 2023 American Community Survey table CP04.
Rehabilitation	St. Clair County has a variety of single-family rehab programs. Targeting of these programs will be based primarily on the needs of low-to-moderate income households. Median household value is lower than the average sale price of a listed home, and with the number of building permits issued under 400, there are few people who are making the necessary maintenance on their homes. This demonstrates a great need for additional assistance to maintain the current housing stock, especially considering in the last year less than 2% of homes on the market have been new construction.
Acquisition, including preservation	Acquisition of properties is not a high priority under this strategic plan. However, the decision to support acquisition properties for redevelopment or preservation will be made either in weak market areas where it is believed that this strategy will help rebuild a market or in high opportunity areas where the preservation of affordable housing is critical to preserve housing choice. As the county is relatively low-density (approximately 391 people per square mile), and the average single-family home is valued at less than the average home on the market, it is challenging to justify acquisition of homes with deferred maintenance when there are many existing homes in need of rehabilitation and adequate available land for development should new construction be pursued.

Table 49 – Influence of Market Conditions

## SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

### Introduction

### 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 (2021-2024): \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,438,146	0	237,761	3,765,907	14,703,628	N/A
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	787,896.86	0	360,000	1,147,896.86	4,591,587.44	N/A

Table 50 - Anticipated Resources

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

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. 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 publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

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

**Discussion**

The County does not have TBRA or Economic Development; however, I cannot remove these selections in IDIS.

### SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
St. Clair County Intergovernmental Grants	Departments and agencies	Homelessness Non-homeless special needs Ownership Planning Rental neighborhood improvements public facilities	Jurisdiction
Homeless Action Council Continuum of Care	Continuum of care	Homelessness	Jurisdiction
Community Action Agency	Departments and agencies	Homelessness Non-homeless special needs	Jurisdiction
Mid America Workforce Investment Board	Regional organization	Economic Development	Region
St. Clair County Housing Authority	PHA	Public Housing	Other
East St. Louis Housing Authority	PHA	Public Housing	Other

Table 51 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

The institutional delivery 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 and Community Services Block Grant Programs more efficiently.

Providing services to rural areas of the county is always challenging. Due to the lack of public transportation operating in these areas, rural populations find it difficult to access program sites but it is also economically infeasible to provide program sites in such remote locations. In response to this challenge in the institutional delivery system, in Program Year 2010 the County instituted a policy to improve the lottery process for soliciting housing rehabilitation clients. Using the USDA definitions of “urban” and “rural” communities, clients’ names were placed in, and selected from, appropriate applicant bins. To meet the needs of citizens with limited access to transportation, the County set up mobile intake offices for the County’s energy assistance programs and established one-stop centers to allow access to employment and training programs and related services.

IGD’s institutional structure 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, and IGD does not have control over the existing landscape of service providers. However, because outreach to rural populations has proven to be difficult, IGD tries to discover and recruit new non-profit organizations that serve rural populations to the Homeless Action Council.

#### Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X

Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			

Table 52 - Homeless Prevention Services Summary

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

Existing formalized collaborations between IGD, the Homeless Action Council, and the Community Action Agency help to coordinate services. Despite this coordination, there are still challenges in reaching rural populations as well as service areas where the existing need exceeds what is available. These challenges are described in further detail below.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

It is important to note that IGD does not receive an ESG or HOPWA allocation to specifically address the needs of homeless and non-homeless special needs populations. However, IGD's formalized collaborations with the Homeless Action Council and Community Action Agency, along with a wide variety of service providers, allow for IGD to effectively facilitate service delivery despite not having control over the existing landscape of service providers. IGD continues to work to discover and recruit new non-profit organizations to the Homeless Action Council.

In attempting to delineate the needs of the homeless in St. Clair County, IGD has identified four areas in which there is currently either lack of service or where the need exceeds what is available.



### **Emergency Shelter**

Emergency shelter is basic, temporary, overnight sleeping accommodation; which sometimes includes a meal and a few services, such as health care and clothing. There is a continued need for additional emergency shelter bed space in St. Clair County. There are also needs for seasonal cooling and warming centers and year-round needs for motel vouchers.

### **Transitional Housing**

Transitional housing combined with supportive services to:

- i. Assist homeless families and individuals overcome the problems/conditions that made them homeless and return to living as independently as possible.
- ii. Increase skills and/or income and to obtain and remain in permanent housing.
- iii. Provide or coordinate, as necessary, substance abuse services, mental health services, day care, life skills training, educational services, family support and other services.

### **Permanent Supportive Housing**

There is a need for permanent housing with supportive services to meet the individual needs of homeless persons and families. This includes housing for homeless persons, including those that are hard-to-serve due to disabilities. There is a profound need for the provision of independent and stable living conditions.

### **Supportive Services**

The demand for these services exceeds the available resources. Through the use of the HMIS and Point-In-Time counts, data shows that the homeless population has increased and the ability to meet the needs has decreased due to the economy and the reduction of available funding. Needs include, but are not limited to, Case Management, Rental Assistance, transportation, food, clothing, and other life-related essentials.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Providing services to rural areas of the county is always challenging. Due to the lack of public transportation operating in these areas, rural populations find it difficult to access program sites, but it is also economically infeasible to provide program sites in such remote locations. In response to this challenge in the institutional delivery system, in Program Year 2010 the County instituted a policy to improve the lottery process for soliciting housing rehabilitation clients. Using the USDA definitions of “urban” and “rural” communities, clients’ names were placed in, and selected from, appropriate applicant bins. To meet the needs of citizens with limited access to transportation, the County set up mobile intake offices for the County’s energy assistance programs and established one-stop centers to allow access to employment and training programs and related services.

IGD’s institutional structure includes many formal 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, and IGD does not have control over the existing landscape of service providers. However, because outreach to rural populations has proven to be difficult, IGD tries to discover and recruit new non-profit organizations that serve rural populations to the Homeless Action Council.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Facilities Improvements	2025	2029	Non-Housing Community Development	St. Clair County & City of Belleville (Area Benefit) East St Louis (Area Benefit)	Public Facilities & Infrastructure Improvements	CDBG: \$12,366,567 HOME: \$0	Other: 67 Other
2	Single-Family Rehab Programs	2025	2029	Affordable Housing	St. Clair County & City of Belleville (Low/Mod Income Household Benefit) East St Louis (Low/Mod Income Household Benefit)	Housing Rehabilitation	CDBG: \$1,801,685 HOME: \$1,734,181.29	Homeowner Housing Rehabilitated: 169 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Affordable Housing Development	2025	2029	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: \$0 HOME: \$1,828,221	Rental Units Rehabilitated & Homeowner Housing Added: 20 Household Housing Unit
4	Homebuyer Assistance	2025	2029	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: \$441,973	Direct Financial Assistance to Homebuyers: 64 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Administration/Planning	2025	2029	Administration	East St Louis St. Clair County & City of Belleville	Homeless/Non-Homeless Special Need Public Facilities & Infrastructure Improvements Housing Rehabilitation Housing Development - New Construction Homebuyer Down Payment Assistance Housing Development - Acquisition/Rehab	CDBG: \$463,635.85 HOME: \$303,051.83	Other: 5 Other

Table 53 – 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	<b>Goal Name</b>	Affordable Housing Development
	<b>Goal Description</b>	Single and/or multi-family for-sale and/or rental new housing development or acquisition/rehab of existing housing for low-to-moderate income residents.
4	<b>Goal Name</b>	Homebuyer Assistance
	<b>Goal Description</b>	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
5	<b>Goal Name</b>	Administration/Planning
	<b>Goal Description</b>	Administration and planning for grant management.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Over the five year 2025-2029 plan period, St. Clair County intends to assist an estimated 254 extremely low-income, low-income, and moderate-income families with affordable housing needs through: (a) developing an estimated 20 new single-family homes, (b) completing an estimated 169 single-family rehab projects through a variety of assistance programs, and (c) providing down payment and closing cost assistance to an estimated 65 low-moderate income families to enable them to purchase affordable homes.

Of these 254 families, 5 low-income and 60 moderate-income families will receive homebuyer assistance; 39 extremely low-income, 128 low-income, and 2 moderate-income families will receive homeowner rehabilitation assistance, and 7 low-income and 13 moderate-income families will receive CHDO housing development assistance.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

IGD recognizes a need to maintain high quality, accessible public housing units. To this end, IGD has addressed many units with weatherization funds and intends to continue this work as long as eligible funds are available from the State of Illinois. IGD also reviews and signs off on SCCHA environmental reports.

SCCHA is operating under a Section 504 / ADA Accessibility Self-Evaluation and Accessibility Transition Plan that was professionally completed in September 2012. Most exterior areas at public locations have already been modified to meet ADA accessibility standards. Where the work has not yet been completed, it is planned for completion within the next one to three years, subject to fund availability. SCCHA's overall housing inventory meets the minimum of five percent (5%) of units accessible to households with mobility impairments and two percent (2%) of units with modifications to accommodate applicants with vision and hearing impairments. As stated earlier, most of SCCHA's public housing inventory was built more than fifty (50) years ago, when accessibility requirements were for the most part non-existent. Over the years, when SCCHA completed substantial renovations at a public housing property, it provided for the required accessibility standards. Additional unit conversions / modifications are "projected" under SCCHA's Transition Plan at locations that have not yet undergone substantial rehabilitation. Those projected conversions were placed under contract in April 2020 with completion expected by the end of 2020. This work will add nine (9) additional accessible units to the SCCHA public housing inventory. In addition to maintaining the required number of accessible units in its overall inventory, SCCHA, as required by law, responds to individual resident requests for reasonable accommodation for unit modifications related to their disability. This is done on an on-going basis, with each request being reviewed on a case-by-case basis. SCCHA has demonstrated its commitment to meet the accessibility needs of current residents in any manner reasonably possible.

### **Activities to Increase Resident Involvements**

The majority of SCCHA public housing residents are represented by resident-elected Resident Councils. SCCHA supports these Resident Councils financially and also provides technical assistance and other in-kind support when requested and to the extent possible. SCCHA also has a Resident Advisory Board for the development and annual update of its Agency Plan.

**Is the public housing agency designated as troubled under 24 CFR part 902?**

No

**Plan to remove the 'troubled' designation**

N/A



## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

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, residential investment in the American Bottoms area is threatened due to uncertainties over future flood insurance requirements. The Southwestern Illinois Flood Prevention District Council (FPD Council) was formed in July 2009 by Madison, Monroe and St. Clair counties in direct response to the Federal Emergency Management Agency's (FEMA) announcement of its intention to de-accredit the 74-mile levee system protecting the St. Louis Metro East region. FEMA's decision would effectively designate substantial portions of the American Bottom area of Southwestern Illinois as a Special Flood Hazard Area (SFHA) on new flood insurance rate maps. If issued as final maps, this classification would require all property owners – residents and businesses – to purchase flood insurance in order to get a mortgage. In order to address this potential challenge, regional leaders successfully sought authorization from the Illinois General Assembly to impose a ¼ percent sales tax to pay for any necessary improvements to the levee system and created independent Flood Prevention Districts (FPDs) within each county with the authority to collect the tax. 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.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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.

The Economic Development Department will work to create more and better employment opportunities for St. Clair County residents by making low-interest loans to businesses that hire low-moderate income residents. With the creation and expansion of businesses and more employment, total assessed valuation in distressed areas should increase, thereby making affordable housing development more financially feasible.

IGD is also committed to ensuring that the affordable housing (and market-rate housing) that is available throughout St. Clair County is available to all eligible households as defined by HUD. To that end, IGD is currently in the process of updating St. Clair County's Analysis of Impediments to affordable housing. The current Analysis of Impediments to affordable housing from July of 2020 is available from IGD upon request.

St. Clair County follows policies and procedures that promote 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.

- The County will inform the public through the following, including, but not limited to: newspaper advertisements or other public notices, statements about Federal laws and marketing to all eligible households included in program descriptions, lottery drawings, brochures, public hearings, Request for Proposals, contracts with developer/owners, notices to the Public Housing Authority and agencies providing programs and services to persons with special needs.
- The County will require each developer of HOME-assisted housing to adhere to these requirements and practices in order to carry out our marketing procedures and requirements.
- The County will require developers to use prescribed procedures to inform and solicit applications from persons in the housing market areas who are least likely to apply for the housing without special outreach
- The County will review marketing actions for compliance with all requirements.

St. Clair County's specific efforts to actively market and provide housing to all eligible households will include:

- Assist the Homeless Action Council (HAC) and will take the lead toward implementing the 10-year plan to end homelessness, coordinating HUD grant activities with HAC members.
- Provide CDBG funds to assist the Housing Resource Center (HRC) as a Public Service Project.
- Include federal laws, regulations/requirements in training sessions with area lenders and realtors during annual Homebuyer Assistance Meetings sponsored and conducted by the Community Development Group of IGD.
- Provide CDBG-funded accessibility grants for disabled persons by working through organizations that provide services to elderly and disabled persons such as the Living Independently Now Corporation (LINC), Division of Rehabilitation Services (DORS), and Programs and Services for Older Persons (PSOP).
- Provide various program brochures in Spanish.
- Promote diversity in participation in our residential programs through advertising programs throughout St. Clair County.

## **SP-60 Homelessness Strategy – 91.215(d)**

### **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 utilizes 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.

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 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.

**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 annual 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.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

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 and is able 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.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

St. Clair County intends to continue addressing lead-based paint hazards through the following strategies:

- **Evaluation**—The St. Clair County Health Department, the Southern Illinois Healthcare Foundation, and the East Side Health District continued to conduct lead assessments, blood lead testing, and education. St. Clair County and the East Side Health District are partners in a grant with the Illinois Environmental Protection Agency for a U.S. Environmental Protection Agency (EPA) grant to distribute lead education materials and provide lead training to contractors.
- **Education**—The County continues to provide lead education, to the health departments to distribute to clients. The County also distributes lead hazard information through other partners, such as the Catholic Urban Programs, the Society of St. Vincent DePaul, St. Clair County Housing Authority, CDBG Operations Corporation and other non-profit housing and health agencies. These agencies used staff time to provide outreach and space to house the literature.
- **General Housing Rehabilitation**—The County’s Housing Rehabilitation Program opens its application process once a year based on available funding. Homeowners are able to apply for funding. The County Housing Rehabilitation Program application list is filled through a lottery system and there are no guarantees that households with EBL children will be chosen. However, once the County learns of EBL children or households with lead hazards, they become a priority. The County also continues to provide a low-interest loan program that is open year-round. When a client is accepted into either the grant or low-interest loan program the County addresses lead hazards first.
- **Planning**—There is still a significant need to reduce lead-based hazards in St. Clair County. St. Clair County has a higher rate of elevated blood lead levels than the United States as a whole. Furthermore, approximately 54% of St. Clair County housing units are at risk for lead-based paint hazards having been built before 1980. Among housing units that are home to households with children age six and under, 8,435 housing units are at risk for lead-based paint hazards according to 2017-2021 CHAS data.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

There is still a significant need to reduce lead-based hazards in St. Clair County. St. Clair County has a higher rate of elevated blood lead levels than the United States as a whole. Furthermore, approximately 54% of St. Clair County housing units are at risk for lead-based paint hazards. Among housing units home to households with children aged six and under, over 8,435 are at risk for lead-based paint hazards.

**How are the actions listed above integrated into housing policies and procedures?**

In addition to the policies and procedures described above, single-family housing rehab is a high priority under this strategic plan. Many of these single-family rehabs include lead hazard reduction measures.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing 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 the promotion of home ownership, job creation and education, are more fundamental to the long-term reduction of poverty.

During the 2025-2029 Strategic Plan period, St. Clair County will undertake a number of initiatives that are consistent with the long-term approach to reducing poverty levels. The County will continue to allocate funding to public service activities through the CDBG program for the Housing Resource Center and other social service agencies. Other CDBG and HOME funded activities will assist lower income persons through such activities as home repair, homeownership assistance, public facilities infrastructure, and a senior/disabled person home accessibility improvement program. All of these activities benefit lower income persons and serve to improve their economic status and well-being. In addition, CDBG funds will be allocated for business development supported activities resulting in the creation or retention of jobs which will be made available to low- and moderate-income persons.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

St. Clair County has a highly coordinated institutional delivery structure through which it carries out the activities identified in this consolidated plan. This structure allows a single umbrella agency - the St. Clair County Intergovernmental Grants Department (IGD) - to ensure that poverty reducing programs and policies are tightly coordinated with affordable housing plans and investments. The structure also allows IGD to identify ways that varied funding sources across programs can be leveraged to achieve more impact.

IGD is the lead agency overseeing the development of the consolidated plan and administering the programs covered by the plan.

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.

IGD also provides staff for the Homeless Action Council (HAC) Planning Committee to assist the Continuum of Care (CoC) in the implementation of the ten-year plan to end homelessness. The Housing Resource Center (HRC) also operates under the IGD umbrella. IGD also provides a meeting place and clerical services for the Community Action Agency (CAA). The IGD Director serves as Executive Director of the 18-member CAA board of directors.

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.

St. Clair County's Anti-Poverty Strategy has been uploaded as part of the appendices.



## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Program compliance monitoring and performance evaluation reviews of all IGD subrecipients/subgrantees are performed by IGD staff. During each program year, IGD staff conduct at least one formal monitoring review at each subrecipient/subgrantee site, complete documentation that details their compliance with HUD regulations, and evaluate their performance and ability to meet the goals and objectives outlined in their contract with IGD.

IGD staff will maintain documentation for each public facilities and improvements contract, showing original amount of funds available, any funds added, and any payments made, with the date of each transaction noted, along with back-up documentation. They will also take photographs of the project before, during and after construction. Staff will interview project workers to assure Davis Bacon wage and job assignments are correct. IGD staff will review requests for payment and weekly payroll records before IGD will make any payouts.

IGD will require written authorization to any project Change Order calling for an increase or decrease in the original project contract bid price before the proposed additional work starts.

IGD staff will perform fiscal monitoring of all subrecipients/subgrantees. All budget revisions will require the prior approval by IGD. CD and Fiscal Group staff will review all billings submitted for accuracy. The Fiscal Group will also verify the existence and condition of CDBG/HOME purchased equipment.

HOME staff will monitor HOME projects for compliance with HOME affordability requirements. They will review annual compliance reports for rents charged, annual tenant income certification forms, sample leases, and sample tenant application forms to ensure that rents and incomes comply with HUD guidelines and that leases and applications do not contain prohibited language.

St. Clair County inspects HOME-assisted properties for property standards as follows:

- 1-4 unit properties are inspected every three years
- 5-25 unit properties are inspected every two years
- Properties with 25 or more units are inspected annually

St. Clair County contractually requires all housing development projects assisted with CDBG and HOME funds to provide documentation for and follow an approved marketing plan for all eligible households.

IGD staff will review the plans and specs for all housing development projects assisted with CDBG or HOME funds for compliance with all applicable accessibility standards and will conduct site visits throughout construction to verify that the construction is completed in accordance with approved plans.

St. Clair County plans to monitor all CDBG and HOME projects. Subrecipient organizations will be monitored annually. Topics reviewed may be staff capacity, consistency in activities for compliance of agreements and regulations, project progress, file organization, record retention, Davis Bacon, Section 3, MBE compliance procurement, contractor requirements, internal controls, financial management, draw requests and audits. The County will also continue to monitor HOME funded rental units for property maintenance requirements, leases, rents, household eligibility and development financials. St. Clair County maintains a listing of local Minority Business Enterprises (MBEs) that is updated annually. All infrastructure projects funded by the county must include the list in their bids and the list is provided to contractors engaging in county-funded rehabilitation projects. All contracts have language pertaining to minority participation.

The County's current comprehensive plan was completed in 2011, and the County adds updates to the plan periodically. The Consolidated plan and Annual Action also acts as a planning tool for the County.

## Expected Resources

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

#### Introduction

#### 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 (2021-2024): \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,438,146	0	237,761	3,765,907	14,703,628	N/A
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	787,896.86	0	360,000	1,147,896.86	4,591,587.44	N/A

Table 54 - Expected Resources – Priority Table

PRIOR YEAR RESOURCES					
	2021	2022	2023	2024	
SCC CDBG Loan Recapture	\$ -	\$ -	\$ 4,362	\$ 111	
SCC CDBG Rehab	\$ -	\$ 10,000	\$ -	\$ -	
SCC CDBG Emergency	\$ -	\$ -	\$ 5,000	\$ -	
SCC CDBG Accessibility	\$ -	\$ 5,000	\$ -	\$ -	
SCC CDBG Demolition	\$ 100,000	\$ -	\$ -	\$ -	
SCC CDBG Public Facilities	\$ -	\$ 108,478	\$ 30,000	\$ 7,650	
	\$ 100,000	\$ 123,478	\$ 39,362	\$ 7,761	
TOTAL SCC CDBG REPROGRAMMED:					\$ 270,601
SCC HOME Homebuyer	\$ -	\$ -	\$ -	\$ 60,000	
SCC HOME Rehab	\$ 200,000	\$ 160,000	\$ 200,132	\$ 300,000	
	\$ 200,000	\$ 160,000	\$ 200,132	\$ 360,000	
TOTAL SCC HOME REPROGRAMMED:					\$ 920,132
ESL CDBG Loan Recapture	\$ -	\$ -	\$ 14,760	\$ -	
ESL CDBG Rehab	\$ -	\$ 100,000	\$ 200,000	\$ 200,000	
ESL CDBG Emergency	\$ -	\$ 5,000	\$ 5,000	\$ 15,000	
ESL CDBG Accessibility	\$ -	\$ 5,000	\$ 5,000	\$ 15,000	
	\$ -	\$ 110,000	\$ 224,760	\$ 230,000	
TOTAL ESL CDBG REPROGRAMMED:					\$ 564,760

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

**Discussion**

The County does 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	2025	2026	Non-Housing Community Development	St. Clair County & City of Belleville (Area Benefit) East St Louis (Area Benefit)	Public Facilities & Infrastructure Improvements	CDBG: \$2,608,278 HOME: \$0	Other: 17 Other
2	Single-Family Rehab Programs	2025	2026	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: \$380,000 HOME: \$463,000	Homeowner Housing Rehabilitated: 39 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Affordable Housing Development	2025	2026	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: \$488,108.18	Rental Units Rehabilitated:1  Homeowner Housing Added: 4 Household Housing Unit
4	Homebuyer Assistance	2025	2026	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: \$118,000	Direct Financial Assistance to Homebuyers: 16 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Administration/Planning	2025	2029	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: \$463,365.85 HOME: \$303,051.83	Other: 5 Other

Table 55 – Goals Summary

## Goal Descriptions



1	<b>Goal Name</b>	Public Facilities Improvements
	<b>Goal Description</b>	Public Facilities Improvements: Infrastructure improvements including sewers, sidewalks, streets, etc.
2	<b>Goal Name</b>	Single-Family Rehab Programs
	<b>Goal Description</b>	Single-Family Rehab Programs to rehabilitate single-family homes owned and occupied by low-to-moderate income homeowners.
3	<b>Goal Name</b>	Affordable Housing Development
	<b>Goal Description</b>	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	<b>Goal Name</b>	Homebuyer Assistance
	<b>Goal Description</b>	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
5	<b>Goal Name</b>	Administration/Planning
	<b>Goal Description</b>	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 - Single-Family Housing Development
9	SCC - Single-Family 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

**Commented [DL1]:** Ensure projects total to the expected resources - HOME isn't adding up for me ...

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

**Table 56 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing 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. A 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. 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 the older, poorer, minority communities. We will also provide infrastructure improvements that help overcome some of the obstacles to making these areas more viable.

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.

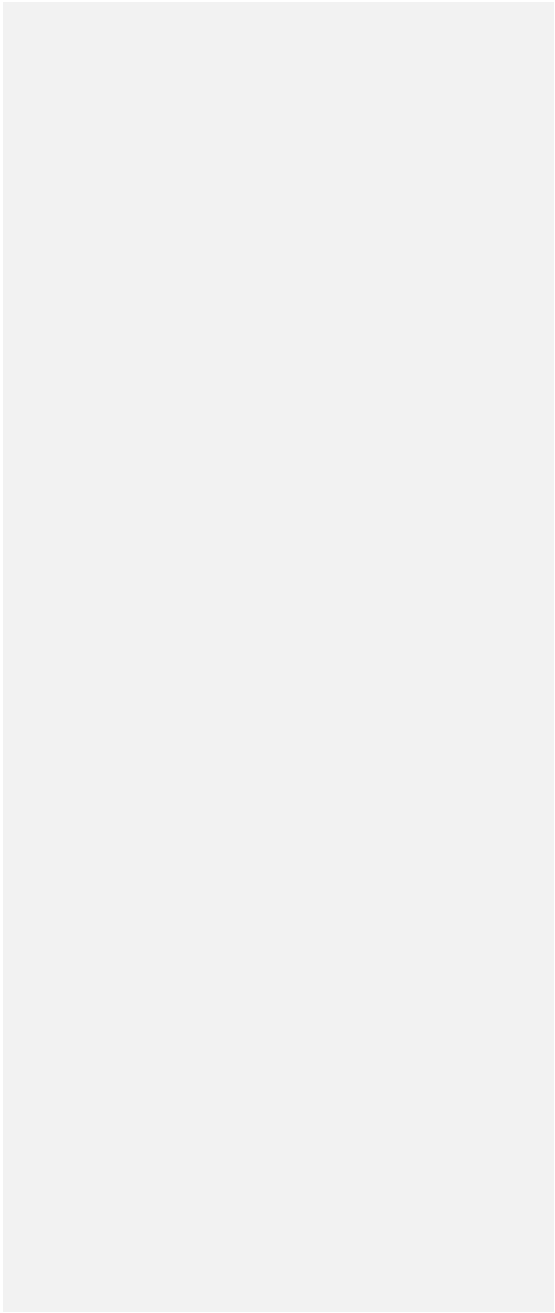
Further, St. Clair County follows policies and procedures that promote outreach to all potentially eligible households, especially those least likely to apply for assistance. These policies and procedures are designed to ensure that the owners of properties assisted with community development funds employ 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.

- The County will inform the public through the following, including, but not limited to: newspaper advertisements or other public notices, statements about Federal housing laws and our marketing policy included in program descriptions, lottery drawings, brochures, public hearings, Request for Proposals, contracts with developer/owners, notices to the Public Housing Authority and agencies providing programs and services to persons with special needs.
- The County will require each developer of HOME-assisted housing to adhere to these requirements and practices in order to carry out our marketing procedures and requirements.
- The County will require developers to use prescribed procedures to inform and solicit applications from persons in the housing market areas who are least likely to apply for the housing without special outreach

The County will review marketing actions for compliance with all requirements.

**AP-38 Project Summary**  
**Project Summary Information**



1	<b>Project Name</b>	SCC - Public Facilities & Improvements
	<b>Target Area</b>	St. Clair County & City of Belleville (Area Benefit)
	<b>Goals Supported</b>	Public Facilities Improvements
	<b>Needs Addressed</b>	Public Facilities & Infrastructure Improvements
	<b>Funding</b>	CDBG: \$1,577,249
	<b>Description</b>	Public Facility grants for 13 Public Facilities Improvement projects such as Infrastructure improvements including sewers, sidewalks, streets, etc.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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.
	<b>Location Description</b>	To be determined
	<b>Planned Activities</b>	Grantees will make improvements to public facilities
2	<b>Project Name</b>	SCC - Single-Family Housing Rehab Assistance
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Housing Development
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$0 HOME: \$340,000
	<b>Description</b>	Single-Family Rehab Forgivable Loan Program to rehabilitate single-family homes owned and occupied by low-to-moderate income homeowners.
	<b>Target Date</b>	9/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated for 38 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Rehabilitation of single-family homes owned by low/mod income households
<b>3</b>	<b>Project Name</b>	SCC - Single-Family Accessibility Assistance
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$10,000
	<b>Description</b>	ADA Wheel Chair Ramps / LINC Rehabilitation of low-mod income homeowner occupied housing units.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated for 2 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Rehabilitation of single-family homes owned by low/mod income households
<b>4</b>	<b>Project Name</b>	SCC - Single-Family Emergency Home Repair Assistance
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$15,000

	<b>Description</b>	CDBG Single-Family Emergency Repair Assistance for low-mod income households to maintain safe, decent housing conditions.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated for 3 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Rehabilitation of single-family homes owned by low/mod income households
5	<b>Project Name</b>	SCC - Single-Family Rehab Program Delivery
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$10,000 HOME: \$60,000
	<b>Description</b>	Program Delivery for Housing Rehab Activities in PY 2025.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Other: 1 Program Delivery for activities benefiting 44 families.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Program delivery
6	<b>Project Name</b>	SCC - Homebuyer Assistance
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)



	<b>Goals Supported</b>	Homebuyer Assistance
	<b>Needs Addressed</b>	Homebuyer Down Payment Assistance
	<b>Funding</b>	HOME: \$70,000
	<b>Description</b>	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Direct Financial Assistance to Homebuyers for 14 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Down Payment and Closing Cost Assistance for Homebuyers.
7	<b>Project Name</b>	SCC - Homebuyer Assistance Program Delivery
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Homebuyer Assistance
	<b>Needs Addressed</b>	Homebuyer Down Payment Assistance
	<b>Funding</b>	HOME: \$30,000
	<b>Description</b>	Program Delivery for Homebuyer Assistance Program in PY 2025
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Other: 1 Program Delivery
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Program delivery

8	<b>Project Name</b>	SCC - Affordable Housing Development
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Housing Development
	<b>Needs Addressed</b>	Housing Development - New Construction
	<b>Funding</b>	HOME: \$270,194.67
	<b>Description</b>	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.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Added for 2 family.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	New Single-Family home development
9	<b>Project Name</b>	SCC - Single-Family Housing Development (CHDO)
	<b>Target Area</b>	St. Clair County & City of Belleville (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Housing Development
	<b>Needs Addressed</b>	Housing Development - New Construction Housing Development - Acquisition/Rehab
	<b>Funding</b>	HOME: \$150,000
	<b>Description</b>	CHDO SET ASIDE - New Construction/Acq. & Rehab of Single-Family homes for low-mod income households using CHDO HOME funds
	<b>Target Date</b>	9/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Added for 1 family.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	New Construction/Acq. & Rehab of Single-Family homes using CHDO HOME funds
10	<b>Project Name</b>	SCC - Planning and Administration
	<b>Target Area</b>	St. Clair County & City of Belleville (Area Benefit)
	<b>Goals Supported</b>	Administration/Planning
	<b>Needs Addressed</b>	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
	<b>Funding</b>	CDBG: \$401,122 HOME: \$62,243.85
	<b>Description</b>	Administration for programs offered by St. Clair County for CDBG and HOME activities.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	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.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Planning and Administration

11	<b>Project Name</b>	ESL - Public Facilities & Improvements
	<b>Target Area</b>	East St Louis (Area Benefit)
	<b>Goals Supported</b>	Public Facilities Improvements
	<b>Needs Addressed</b>	Public Facilities & Infrastructure Improvements
	<b>Funding</b>	CDBG: \$1,031,029
	<b>Description</b>	Public Facility grants for Public Facilities Improvements such as Infrastructure improvements including sewers, sidewalks, streets, etc.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The entire LMI population of 20,250 persons or 77.3 % of the East St. Louis population will benefit from this activity.
	<b>Location Description</b>	To be determined
	<b>Planned Activities</b>	Grantees will make improvements to public facilities
12	<b>Project Name</b>	ESL - Single-Family Housing Rehab Assistance
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$300,000 HOME: \$48,000
	<b>Description</b>	Single-Family Rehab Forgivable Loan Program to rehabilitate single-family homes owned and occupied by low-to-moderate income homeowners.
	<b>Target Date</b>	9/30/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated for 14 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Rehabilitation of single-family homes owned by low/mod income households
13	<b>Project Name</b>	ESL - Single-Family Accessibility Assistance
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$15,000
	<b>Description</b>	ADA Wheel Chair Ramps / LINC Rehabilitation of low-mod income homeowner occupied housing units.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated for 3 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Rehabilitation of single-family homes owned by low/mod income households
14	<b>Project Name</b>	ESL - Single-Family Emergency Home Repair Assistance
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$15,000

	<b>Description</b>	CDBG Single-Family Emergency Repair Assistance for low-mod income households to maintain safe, decent housing conditions.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Rehabilitated for 3 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Rehabilitation of single-family homes owned by low/mod income households
15	<b>Project Name</b>	ESL - Single-Family Rehab Program Delivery
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Rehab Programs
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$15,000 HOME: \$15,000
	<b>Description</b>	Program Delivery for Housing Rehab Activities in PY 2020.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Other: 1 Program Delivery for activities benefiting 20 families.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	ESL - Program delivery
16	<b>Project Name</b>	ESL - Homebuyer Assistance
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)

	<b>Goals Supported</b>	Homebuyer Assistance
	<b>Needs Addressed</b>	Homebuyer Down Payment Assistance
	<b>Funding</b>	HOME: \$10,000
	<b>Description</b>	Down payment and closing cost assistance for low-moderate income households for purchase of affordable homes.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Direct Financial Assistance to Homebuyers for 2 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	Down Payment and Closing Cost Assistance for Homebuyers.
17	<b>Project Name</b>	ESL - Homebuyer Assistance Program Delivery
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Homebuyer Assistance
	<b>Needs Addressed</b>	Homebuyer Down Payment Assistance
	<b>Funding</b>	HOME: \$8,000
	<b>Description</b>	Program Delivery for Homebuyer Assistance Program in PY 2025
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Other: 1 Program Delivery for Homebuyer Assistance for 2 families.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Program delivery

18	<b>Project Name</b>	ESL – Affordable Housing Housing Development
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Affordable Housing Development
	<b>Needs Addressed</b>	Housing Development - New Construction
	<b>Funding</b>	HOME: \$47,913.51
	<b>Description</b>	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.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Added for 1 families.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	New Single-Family home development
19	<b>Project Name</b>	ESL - Single-Family Housing Development (CHDO)
	<b>Target Area</b>	East St Louis (Low/Mod Income Household Benefit)
	<b>Goals Supported</b>	Single-Family Housing Development
	<b>Needs Addressed</b>	Housing Development - New Construction Housing Development - Acquisition/Rehab
	<b>Funding</b>	HOME: \$20,000
	<b>Description</b>	CHDO SET ASIDE - New Construction/Acq. & Rehab of Single-Family homes for low-mod income households using CHDO HOME funds
	<b>Target Date</b>	9/30/2026



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeowner Housing Added for 1 family.
	<b>Location Description</b>	Various locations
	<b>Planned Activities</b>	New Single-Family home development
20	<b>Project Name</b>	ESL - Planning and Administration
	<b>Target Area</b>	East St Louis (Area Benefit)
	<b>Goals Supported</b>	Administration/Planning
	<b>Needs Addressed</b>	Public Facilities & Infrastructure Improvements Housing Rehabilitation Affordable Housing Development - New Construction Homebuyer Down Payment Assistance Housing Development - Acquisition/Rehab
	<b>Funding</b>	CDBG: \$286,507 HOME: \$16,544.83
	<b>Description</b>	Administration for programs offered by St. Clair County for CDBG and HOME activities.
	<b>Target Date</b>	9/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The entire LMI population of 20,250 persons or 77.3 % of the East St. Louis population will benefit from this activity.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	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 2025 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 47%, to assist public facilities and improvements in the County. 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, 47% of all funds (CDBG and HOME) will be used for public facilities improvements; 2% for demolition; 1% for public services; 23% for single-family rehab programs; 9% for single-family housing development; 4% for homebuyer assistance programs; and 14% for program planning and administration.

### Geographic Distribution

Target Area	Percentage of Funds
East St Louis	39
St. Clair County & City of Belleville	61
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 57 - 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

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	34
Special-Needs	5
Total	39

Table 58 - 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	5
Rehab of Existing Units	39
Acquisition of Existing Units	0
Total	44

Table 59 - 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 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.

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.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Because of the age and/or functional obsolescence of the buildings and/or the deteriorated state of the surrounding infrastructure, SCCHA requested and obtained HUD approval for the demolition of the Adeline James Building (32 elderly designated units) and twenty (20) family units located on South 46th Street in Centreville, which is a portion of the Ernest Smith Sr. Apartments in Centreville known as development #30-08 with a total of 126 family units -prior to demolition. SCCHA anticipates receiving Replacement Tenant Protection Vouchers (TPVs) on a one-for-one basis for each unit demolished. SCCHA intends to submit a second demolition application in calendar year 2020 for the demolition of the remaining 106 units in the #30-08 development.

For the same reasons stated above and at HUD's encouragement, SCCHA, in conjunction with its contracted Housing Development Partner (HDP) will evaluate the feasibility of re-positioning some or all of remaining public housing assets to the Rental Assistance Demonstration (RAD) Program.

St. Clair County will continue to help address the needs of public housing and its residents by making grants available to assist residents with rent, security deposits, utility bills and other services when available and making grants available for infrastructure improvements and physical improvements to public housing units, subject to fund availability and competing needs.

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

Enhance the availability of affordable housing units by optimizing the use of existing resources through strategic maintenance and management practices that aim to keep units operational and minimize the downtime associated with vacancies. Focus on sustaining or expanding the lease-up rates of Housing Choice Vouchers by implementing payment standards that allow families to secure rentals across the entire jurisdiction. This includes actively promoting the program to property owners, especially those in areas with lower concentrations of minority and low-income populations, while rigorously enforcing the "Family Obligations" set for program participants to boost landlord participation. It is essential to ensure that affordable housing options are accessible to all families, regardless of their size requirements. Additionally, pursue opportunities to apply for more Housing Choice Vouchers specifically allocated for households with disabilities and collaborate with other stakeholders to increase the overall stock of affordable housing units.

Efforts will be directed towards providing assistance to families whose income is at or below 30% of the Area Median Income (AMI), surpassing the federal targeting standards set by HUD for public housing and tenant-based Housing Choice Voucher programs. This can be achieved by

implementing admission preferences specifically for families facing economic challenges and by establishing rent policies that promote and facilitate employment opportunities for families earning at or below 50% AMI, while also prioritizing admissions for working families.

In addition, it is essential to allocate available assistance to the elderly by reserving specific public housing units exclusively for senior citizens aged 62 and older. Furthermore, assistance should be extended to families with disabilities by designating certain public housing units for non-senior individuals with disabilities. It is also important to implement necessary modifications in public housing as identified in the Section 504 Needs Assessment and to actively promote these initiatives to local non-profit organizations that support families with disabilities.

Effectively use the Capital Fund Grant program by applying for other capital improvement funds when available; providing training and professional development for front-line and supervisory employees; and achieving “high performer” designation under HUD’s public housing assessment system. Employ effective applicant screening and lease enforcement practices. Engage, support and cooperate with local law enforcement to ensure the level of service provided public housing neighborhoods is at or above that provided the community at large; and collaborate with law enforcement, resident organizations, and others to ensure that the level of criminal activity in public housing developments is at or below surrounding neighborhoods.

In 2021, SCCHA decreased its housing inventory by fifty-two (52) public housing units. The relocation of all tenants was executed successfully. In response to the diminished availability of housing units, we have expanded our Project Based Vouchers across the community to assist partners engaged in the construction of affordable housing developments. These initiatives align with the SCCHA Annual Plan, which aims to either preserve current affordable housing options or encourage the creation of new ones.

SCCHA has appointed a Housing Development Partner and is in the final stages of converting its properties in Lebanon and O’Fallon (Silver Creek Development) to ensure the sustainability of its public housing portfolio. This transition involves the conversion of public housing properties under the Rental Assistance Demonstration (RAD) program. RAD will provide SCCHA with an effective mechanism for the preservation and enhancement of the units, while also tackling the significant nationwide backlog of maintenance that has been deferred for extended periods. The completion of this conversion process is anticipated by mid-2025.

For the same reasons stated previously and at HUD’s encouragement, SCCHA will evaluate the feasibility of re-positioning some or all of remaining public housing assets to the Rental Assistance Demonstration (RAD) Program.

St. Clair County will continue to help address the needs of public housing and its residents by making grants available to assist residents with rent, security deposits, utility bills and other services when available and making grants available for infrastructure improvements and physical

improvements to public housing units, subject to fund availability and competing needs.

**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 supports these Resident Councils financially and also provides technical assistance and other in-kind support when requested and to the extent possible. SCCHA also has a Resident Advisory Board for 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 Program (FSS) that serves both Public Housing and Housing Choice Voucher Program participants. There are currently 42 families enrolled in the program. Many of these families have established buying a home as a final goal. The FSS Program Coordinator periodically schedules Homebuyer Counseling certificate sessions for FSS participants. The Homebuyer Counseling sessions are also periodically offered to public housing and HCVP participants who do not participate in the FSS program through the Family Resource Centers (a contract service) or other sponsors. SCCHA tracks move-out reasons for public housing residents and HCVP participants. It is estimated that up to 10% of the households who leave these programs annually do so because they purchased their own home. The Grantee (St. Clair County) also encourages residents of public housing, who are ready to transition to homeownership, to utilize the County's Homebuyer Assistance program.

SCCHA periodically shares homeownership materials and sponsors first-time homebuyer training sessions in collaboration with SCC-IGD and other community organizations. Each year residents leaving the public housing and/or housing choice voucher program report that they are leaving the program 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 2025:

- 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. In



order 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.

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.

Additionally, IGD's chronic homelessness action steps for 2020 will be coordinated with the St. Clair County Continuum of Care strategic plan and

will likely be similar to the chronic homelessness action steps from previous years:

- Through the HAC the County will identify, rehab and produce safe, affordable housing.
- Utilize “wrap around” services, including intervention and relapse prevention; coordinate services with other programs and services; and utilize outreach efforts to find clients and assist them with services.

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 2020 will be coordinated with the St. Clair County Continuum of Care strategic plan 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, in order 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 in order 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 and is able 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 in order 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 2020 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. The County will continue to apply for Lead Hazard Reduction Grants available through HUD.

#### **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 2020 Program Year, St. Clair County will undertake a number of initiatives that are consistent with the long-term approach to reducing poverty levels. The County will continue to allocate funding to public service activities through the CDBG program. Other 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. All of 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 Lead Hazard Reduction Grant, 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 lead remediation, 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) in the implementation of the ten-year plan 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, as well as administer other housing counseling and education efforts. IGD also offers housing counseling and education and promotes affordable housing throughout St. Clair County.

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(l)(1,2,4)

#### Introduction:

IGD will issue a Request for Proposals annually and rank submissions in order to determine which organizations to fund out of the identified public services/homeless/non-homeless special needs strategic plan budget. Eligible activities are expected to include homeless services, senior services, disability services, legal services, screening for lead poisoning, and housing counseling services. While IGD does not require that RFP submissions directly address the needs of non-homeless special needs populations or the housing and supportive service needs of persons who suffer from HIV/AIDS, IGD does welcome proposals from organizations throughout St. Clair County that serve these groups.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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        |
| <b>Total Program Income:</b>  | <b>0</b> |

### 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 \$1,173,969.01, HOME program income of \$2,825.16 is projected in PY2024 and this comes from loan payments (interest & principle).

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 \$196,000 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:

Consistent with 24 CFR Part 92.254(a)(4), the County enforces the following minimum periods of affordability: 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:**

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.

## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> Point In Time Count 1/23/2025
	<b>List the name of the organization or individual who originated the data set.</b> East Saint Louis/Belleville/St. Clair County Continuum of Care (reported to and obtained via HUD)
	<b>Provide a brief summary of the data set.</b> Dataset contains a Point In Time count of homeless populations and subpopulations for January 30, 2015.
	<b>What was the purpose for developing this data set?</b> The purpose of developing the dataset is to have a better understanding of homeless needs in the St. Clair County area. Additionally, Continuum of Cares are required to provide an unduplicated count of homeless persons according to HUD standards, and the Point In Time count dataset meets this requirement.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The goal of the Point in Time count dataset is to be as comprehensive as possible to obtain a true, unduplicated count of homeless populations and subpopulations in St. Clair County. That said, it is extremely difficult to obtain a reliable census counts of the homeless, and counts are widely looked upon as underreported. Local service providers have verified that the homeless population is larger than reported and indicated that the demand for services far outpaces available resources. Local service providers estimate that there are approximately 1,500 to 2,000 homeless individuals in St. Clair County.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> January 30, 2015.
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete.

2	<b>Data Source Name</b>
	2020 Census
	<b>List the name of the organization or individual who originated the data set.</b>
	United States Census Bureau
	<b>Provide a brief summary of the data set.</b>
	The 2020 Decennial Census contains information on vacant units and other housing and population data.
	<b>What was the purpose for developing this data set?</b>
To have an accurate count of people and households, for redistricting and other purposes.	
<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b>	
The Decennial Census is the most comprehensive count available, aiming to capture every person, household, and housing unit.	
<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b>	
2020 snapshot.	
<b>What is the status of the data set (complete, in progress, or planned)?</b>	
Complete	
3	<b>Data Source Name</b>
	2017-2023 CHAS
	<b>List the name of the organization or individual who originated the data set.</b>
U.S. Census Bureau	
<b>Provide a brief summary of the data set.</b>	
Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households.	



	<p><b>What was the purpose for developing this data set?</b></p> <p>The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data is compiled for various jurisdictions and is made available at the household level.</p> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2017 to 2023</p> <p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
4	<p><b>Data Source Name</b></p> <p>2025 PIT Count</p> <p><b>List the name of the organization or individual who originated the data set.</b></p> <p>East Saint Louis/Belleville/St. Clair County Continuum of Care (reported to and obtained via HUD)</p> <p><b>Provide a brief summary of the data set.</b></p> <p>Dataset contains a Point In Time count of homeless populations and subpopulations for January 23, 2025.</p> <p><b>What was the purpose for developing this data set?</b></p> <p>The purpose of developing the dataset is to have a better understanding of homeless needs in the St. Clair County area. Additionally, Continuum of Cares are required to provide an unduplicated count of homeless persons according to HUD standards, and the Point In Time count dataset meets this requirement.</p>

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The goal of the Point in Time count dataset is to be as comprehensive as possible to obtain a true, unduplicated count of homeless populations and subpopulations in St. Clair County. That said, it is extremely difficult to obtain a reliable census counts of the homeless, and counts are widely looked upon as underreported. Local service providers have verified that the homeless population is larger than reported and indicated that the demand for services far outpaces available resources. Local service providers estimate that there are approximately 1,500 to 2,000 homeless individuals in St. Clair County.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>1/23/2025</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
5	<p><b>Data Source Name</b></p> <p>HUD HOME Rent Limits for the St. Louis Metro Area</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>HUD</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>HOME rent limits</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To provide a breakdown of rent limits for the St. Louis Metro Area</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>St. Louis Metro Area</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2025</p>

	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete
6	<b>Data Source Name</b> 2023 ACS 5-year estimates DP04
	<b>List the name of the organization or individual who originated the data set.</b> U.S. Census Bureau
	<b>Provide a brief summary of the data set.</b> Vacant units are produced by ACS table DP04. The vacant units are not broken down into other categories, including abandoned or suitable for rehabilitation. Using the 2010 Census ratios as a benchmark (the 2010 dataset breaks down vacant properties from abandoned, coded as "other"), we can safely assume that 60% of all vacant properties are suitable for rehabilitation, 20% are abandoned and suitable for rehabilitation, and the remaining 20% are abandoned and not suitable for rehabilitation.
	<b>What was the purpose for developing this data set?</b> While there is no county wide source for whether vacant units are suitable or not suitable for rehabilitation, vacant units that are for rent/sale/seasonal use are likely already livable or suitable for rehabilitation. However, vacant units that are estimated as being abandoned may not be suitable for rehabilitation as units that have been vacant for a long time are often damaged by vandals or open to the elements. We estimate that these buildings may have a 50/50 chance of being suitable for rehabilitation. The ultimate suitability of a building for rehabilitation depends on many factors, including condition, building type, architectural significance, and available financing tools.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> County level
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> 2023
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete

7	<b>Data Source Name</b>
	2017-2023 ACS 5-year estimates Table S2001
	<b>List the name of the organization or individual who originated the data set.</b>
	U.S. Census Bureau
	<b>Provide a brief summary of the data set.</b>
	American Community Survey median earnings by level of educational attainment
	<b>What was the purpose for developing this data set?</b>
To evaluate median earnings by level of educational attainment	
<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b>	
County level	
<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b>	
2017-2023	
<b>What is the status of the data set (complete, in progress, or planned)?</b>	
Complete	
8	<b>Data Source Name</b>
	2025 Housing Inventory Count
	<b>List the name of the organization or individual who originated the data set.</b>
	St. Clair County Intergovernmental Grants Department
<b>Provide a brief summary of the data set.</b>	
An inventory of housing targeted to homeless households in the jurisdiction	
<b>What was the purpose for developing this data set?</b>	
The data is derived from the collection of reported programs in the community.	

	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Jurisdiction</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2025</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
9	<p><b>Data Source Name</b></p> <p>St. Clair County Housing Authority Data</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>St. Clair County Housing Authority</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>PBV/TBV and accessible unit counts</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To fill in gaps in the PIC data set to address HUD reviewer's question</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Specific only to St. Clair County Housing Authority units and vouchers</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2024-2025</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>