



St. Clair County, IL
Program Year 2020
Consolidated Annual Performance
Evaluation Report
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St. Clair County Board

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

In addition to the goals and objectives at the national level that compose the Outcome Performance Measurement Framework, the County has established goals and objectives at the programmatic level for individual projects to facilitate year end evaluation.

In PY 2020 the County provided affordable housing assistance to 47 low-moderate income households. Nineteen (19) households received homebuyer assistance and 25 received home rehab assistance. Using HOME funds, 3 housing units were assisted and completed by CHDO developers.

Twenty (20) public facilities and infrastructure improvement projects in low-moderate income areas were completed in PY 2020, exceeding the annual of 17 projects by achieving 118% of our Annual Plan goal. As the COVID-19 pandemic continued through PY 2020, the County focused on activities that aligned with the needs and restrictions associated with the pandemic. The public facility and infrastructure improvements undertaken were outdoor projects that did not require entering private homes or substantial interaction with members of the public.

In PY 2020, 11 public services programs were completed, which is 275% of our annual goal of completing 4 programs. The 11 completed programs represent 61% of our five year Consolidated Plan goal of 18 programs. The increase in the number of public service programs is a result of the ongoing COVID-19 pandemic, which continued to significantly impact St. Clair County's activities during PY 2020.

Although Economic Development was not originally a goal established in the Strategic Plan or Annual Action Plan, the ongoing nature of the COVID-19 pandemic and subsequent PY2020 CDBG-CV funding allocation allowed St. Clair County to continue funding the type of economic development activities that were initiated in response to the emergence of the COVID-19 pandemic in PY 2019. At that time, this new goal was introduced through an Amendment to our Five Year Consolidated Plan and several activities were underway at the end of PY 2019 and continuing on into PY 2020. While we do not have an established activity goal, we were able to provide assistance to qualifying businesses 35 times in PY 2020. At this time, we do not foresee this activity continuing into future years once the pandemic subsides.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration/ Planning	Administration and Planning	CDBG: \$ / HOME: \$	Other	Other	10	2	20%	2	2	100.00%
Building Demolition/ Land Clearance	Non-Housing Community Development	CDBG: \$ / HOME: \$	Buildings Demolished	Buildings	27	0	0%	6	0	0%
Economic Development	Non-Housing Community Development	CDBG: \$ / HOME: \$	Businesses assisted	Businesses Assisted	0	35	N/A	0	35	N/A
Homebuyer Assistance	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	130	19	15%	38	19	50%
Public Facilities Improvements	Non-Housing Community Development	CDBG: \$ / HOME: \$	Other	Other	78	20	26%	17	20	118%
Public Services Programs	Non-Housing Community Development	CDBG: \$ / HOME: \$	Other	Other	18	11	61 %	4	11	275%
Single-Family Housing Development	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	20	3	15%	9	3	33%
Single-Family Rehab Programs	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	264	25	10%	69	25	36%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The following summarizes the County’s progress in meeting its high priorities for the CDBG and HOME programs:

Public Services: The County's goal for public services in East St. Louis in PY 2020-2024 is to complete 18 activities, and in PY2020 11 public service activities were completed and a further two are underway. These open activities are: PY 2020 Christian Activity Center and PY 2020 East Side Health District, both of which are anticipated to be closed out by 12/31/2021. With these two additional programs completed, we will be at 375% of our PY 2020 goal and 72% of our five-year goal for public service activities. Public service activities were a high priority in PY 2020 as part of the County’s response to the ongoing COVID-19 pandemic, which explains why the County significantly exceeded its goal.

Public Facilities and Infrastructure Improvements: The County's PY 2020-PY 2024 goal for public facility and improvements was to complete 78 projects. In PY 2020, twenty (20) public facilities and improvement projects in predominantly low-moderate income areas funded with CDBG have been completed, representing 118% of our annual goal. Further, another 18 CDBG-funded projects were underway as of the end of the 2020 program year.

Housing Rehabilitation: The County's PY 2020-2024 goal for single-family rehab is to complete 264 projects and in PY2020, we completed 28 projects, falling short of our annual goal of 69 projects. Another 11 projects are underway as of the end of the 2020 program year, boosting our rate of achievement for this goal from 41% to 57%. As in PY 2019, the ability to meet this goal was significantly impacted by the COVID-19 pandemic as contractors could not safely enter homes to perform this work. Further, there is an ongoing shortage of both labor and construction materials that has resulted in decreased interest by contractors in bidding this work. This is the first year of our five-year Consolidated Plan cycle and we anticipate improved progress towards meeting our goal as the pandemic subsides and conditions return to normal. Progress towards this goal will be reviewed next year and any necessary amendments will be undertaken.

Homebuyer Down Payment Assistance: The County's PY 2020- 2024 homebuyer assistance goal is to provide assistance to 130 low-moderate homebuyers. In PY 2020, we have assisted 19 homebuyers, which is 50% of our annual goal and 15% of our five year goal. Five PY 2020 projects remain open and will result in 63% of the annual goal being met upon completion. As with housing rehabilitation, this goal was impacted by the COVID-19 pandemic and ensuing volatile real estate market in 2021, where the for-sale housing supply remained extremely low while housing prices spiked, resulting in a shortage of homes available for purchase for prospective low-to-mod income homebuyers. As PY 2020 is the first year in our current five-year plan cycle, we intend to review progress made in achieving our goal in PY 2021. At that time, we feel confident that

will have adequate information to determine if an amendment is necessary or if the housing market has normalized to a degree where our goal remains realistic.

Single-Family Housing Development: The County set a goal of 9 single-family homes to be developed with HOME assistance in PY 2020. Three single-family homes have been completed, all of them by CHDOs (100%), and 3 additional homes were underway (by CHDOs), but not yet completed as of the end of the program year. One of the two open projects has reached 92% completion and the other two have reached construction completion. County's five-year goal for single-family housing development is 20 homes completed, so we remain on track to meet or exceed the County's five-year goal through activities in the coming program years.

Building Demolition: The County budgeted \$100,000 for demolition in PY 2020. Given the number of demolitions needed, SCC has decided to combine the PY 2020 and PY 2021 funding into one package in order to attract competitive bids during a very tight construction labor market. Therefore, the County anticipates meeting the Strategic Plan goal for demolition for PY 2020 in 2021.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG	HOME
White	2	13
Black or African American	8	21
Asian	0	0
American Indian or American Native	0	1
Other- Multi-Racial	0	2
Total	10	37
Hispanic	0	0
Not Hispanic	10	37

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

In PY 2020, direct benefit activities implemented with CDBG and HOME funds, all housing programs, benefited 47 households. Of these 47 households served in PY 2020, 15 were White, 29 were Black or African American, 1 was American Indian/Alaskan Native, and 2 were other-Multi-Racial. These numbers do not take into account the area benefit activities of public services and public facilities and improvements that benefit a specific geographic area. The numbers for activities with area benefits are pulled from census tract data for the areas which the activities benefit.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	4,105,209	5,081,753.36
HOME	HOME	1,918,353	1,126,232.81
HOPWA	HOPWA	0	0
ESG	ESG	0	0
Section 108	Section 108	0	0
Other	Other	3,820,554	0

Table 3 - Resources Made Available

Narrative

No publicly owned land or property located within the jurisdiction was used to address the needs identified in the plan. When considering HOME and CDBG investments, 35% of the total investment occurred in East St. Louis and 65% occurred in Belleville and the remaining portion of St. Clair County. The majority of resources were used on Area Benefit activities, with 25% and 36% of total PY 2020 resources invested in Area Benefit Activities in East St. Louis and the remainder of St. Clair County respectively.

The HOME matching requirement was met through the contribution of land appraised vs purchased or donated amount and site preparation (inspections/appraisals), donated construction materials and/or donated labor.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
East St Louis	37	5	Other
East St Louis (Area Benefit)		25	Other
East St Louis (Low/Mod Income Household Benefit)		0	Other
East St Louis (Low/Mod Income Housing Benefit)		4	Other
East St Louis (Low/Mod Income Job Benefit)			
St. Clair County & City of Belleville	63	7	Other
St. Clair County & City of Belleville (Area Benefit)		36	Other
St. Clair County & City of Belleville (Low/Mod Income Household Benefit)		0	Other
St. Clair County & City of Belleville (Low/Mod Income Housing Benefit)		17	Other
St. Clair County & City of Belleville (Low/Mod Income Job Benefit)		5	

Table 4 – Identify the geographic distribution and location of investments

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Awarding CDBG and HOME funds and incentives to programs that make use of other private and non-profit resources remains central to the philosophy of St. Clair County. The County tries to secure other resources where possible to fill the housing needs identified in its Consolidated Plan.

From October 1, 2020 through September 30, 2021 LIHEAP obligated \$4,330,572 in State and Federal funds to assist 7,105 income-eligible households with their winter energy costs. In most cases this assistance was in the form of a one-time payment paid directly to the utility provider. The LIHEAP program includes a Reconnection Assistance component which assists households with restoration of utility service and/or prevention of service disconnection. Through the Furnace Assistance component of the program, the LIHEAP program spent \$73,869 assisting 22 households with furnace repair or replacements.

The County's Weatherization Program assists low-income households with energy conservation by installing weatherization measures that impede conditioned air from leaving the home; and repairs and replaces furnaces and water heaters. This program is funded by the Community Services Block Grant (CSBG) program and the following funding sources:

- Department of Energy
- Department of Health and Human Services
- Illinois Home Weatherization Assistance Program

CDBG and HOME funds were also leveraged with the following Federal, State, local and private sources, some received by the County and some by other agencies, and made available to programs, projects and services carried out to address underserved needs in PY 2020.

- HOPWA (through IL Department of Human Services or St. Louis HOPWA agency)

- HUD Housing Counseling Program (through CDBG Operations Corp. or Urban League)
- Community Services Block Grant (CSBG)
- Shelter Plus Care Program
- Low Income Home Energy Assistance Program (LIHEAP)
- Illinois Home Weatherization Assistance Program
- Motor Fuel Tax (MFT) Funds
- St. Clair County Community Action Agency
- Supportive Housing Program
- Tax Increment Financing (TIF) Funds
- Municipal/Township General or Dedicated Funds

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	1,324,729.63
2. Match contributed during current Federal fiscal year	55,632.00
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,380,371.63
4. Match liability for current Federal fiscal year	191,070.35
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,189,301.28

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
4084	10/16/2020			13,137.00				13,137.00
4184	11/01/2020			21,897.00				21,897.00
4157	11/01/2020			20,598.00				20,598.00

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$	\$	\$	\$	\$
97.59	508,495.89	470,414.28	0	38,179.20

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	803,615	0	0	89,927	0	713,688
Number	18	0	0	4	0	14
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	803,615	0	803,615			
Number	18	0	18			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	110	47
Number of Special-Needs households to be provided affordable housing units	6	0
Total	116	47

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	9	3
Number of households supported through Rehab of Existing Units	69	25
Number of households supported through Acquisition of Existing Units	38	19
Total	116	47

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Under households supported through the production of new units the County is counting housing developed with CDBG and HOME funding assistance, whether new construction or acquisition/rehab because the acquisition/rehabs are generally homes that are not occupiable before rehab. Our goal for the program was for 9 homes to be completed in PY 2020. Three single-family homes have been completed, all of them by CHDOs (100%), and 3 additional homes were underway (by CHDOs), but not yet completed as of the end of the program year. One of the two open projects has reached 92% completion and the other two have reached construction completion. The County's five-year goal for single-family housing development is 20 homes completed, so we remain on track to meet or exceed the County's five-year goal through activities in the coming program years.

The number of households supported through the rehab of existing units includes those projects completed under the County's CDBG-funded home accessibility improvement, emergency home repair and our CDBG and HOME-funded home rehab programs. Our PY 2020 goal was to provide 69 households with home rehab assistance. We actually completed 25 projects during the program year (36% of our annual goal) and we had another 11 home rehab projects underway as of the end of PY 2020. Our five-year goal for this activity is to complete 264 projects. As in PY 2019, the ability to meet this goal was significantly impacted by the COVID-19 pandemic as contractors could not safely enter homes to perform this work.

The number of households supported through the acquisition of existing units includes households assisted through our HOME-funded Homebuyer Assistance Program. While our PY 2020 goal for this activity was for 38 households to be assisted, we only assisted 19 homebuyers (50% of our annual goal). Five PY 2020 projects remain open and will result in 63% of the annual goal being met upon completion. As with housing rehabilitation, this goal was impacted by the COVID-19 pandemic and ensuing volatile real estate market in 2021, where the for-sale housing supply remained extremely low while housing prices spiked, resulting in a shortage of homes available for purchase for prospective low-to-mod income homebuyers.

Discuss how these outcomes will impact future annual action plans.

As noted, the ongoing COVID-19 pandemic has impacted the County's priorities and achievements. Future Annual Action Plans will consider the outcomes achieved in PY 2020, the first program year of our five-year cycle, and opportunities to increase progress towards achievement of our five-year strategic goals. We will work make sure realistic goals are set.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	5	5
Low-income	5	12
Moderate-income	0	20
Total	10	37

Table 13 – Number of Households Served

Narrative Information

Of the 47 households served by activities where information on income by family size is required in the 2020 program year, 21% were extremely low-income, 36% were low-income and 43% were moderate-income. In PY 2020, only owner households were assisted, with 10 extremely low income, 17 low income, and 20 moderate income households assisted using CDBG and HOME funds. No homeless or renter households were assisted.

Through the Community Development Block Grant, St. Clair County IGD provides low-interest loans to persons with disabilities to modify their homes to increase accessibility. Allowed modifications include interior and exterior ramps, doors, grab bars, installation of accessible baths or shower units, as well as other needed changes to make the disabled applicant's home accessible. In PY 2020, none of these loans were made due to the ongoing COVID-19 pandemic, which restricted the County's ability to conduct repairs and modifications to the interior of homes.

Low-interest loans that can be used to address seriously substandard housing are also made available by IGD through the County's Housing Rehabilitation Program. Availability of this program is listed on the County's website and discussed at public meetings. Applications are accepted on a rolling basis, first come first served until funds are depleted. St. Clair County is also a partner in the COC, which provides extensive services to individuals experiencing homelessness. For example, rent deposits and the first month(s) rent are made available. If the homeless individual is disabled, assistance in securing a suitable unit is provided.

The worst-case housing needs in St. Clair County are those experienced individuals living in seriously substandard housing. The County ensures that it meets the Section 215 definitions and requirements for all housing programs.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The County's Homeless Action Council Agencies refer their clients to the County's Housing Resource Center (HRC), a unit of the Intergovernmental Grants Department's Community Development Group. The HRC serves as a first point of entry and is the Coordinated Assessment Center for Illinois Continuum of Care ("CoC") 508. The County has a staff person who participates in the CoC on a monthly basis and networks with several agencies in the CoC to provide services/housing to address both homeless and non-homeless needs.

The HRC provides supportive services to those who require supportive housing by providing intake and assessment for CoC Program housing placements and case management. The HRC also makes referrals to other social service agencies. HRC's homeless assessment tool through HMIS provides a comprehensive intake that addresses all of HUD's required data elements. In addition, the system used, ServicePoint, is one of the most robust HMIS systems in the country and provides for a variety of options including full case management, shelter management, electronic record keeping, referrals and reporting. The Coordinated Intake system prioritizes those with the highest vulnerability and gets them housed first. It sends a household to the best fitting intervention from the start. It provides a system-wide prevention and diversion opportunity. It improves system efficiency and fosters more collaboration among providers.

The Continuum of Care operates on a Housing First Model which eliminates barriers to housing. Anyone entering the system is assessed through a tool which determines their level of vulnerability and gives them a score. They are assigned to a variety of housing options (private rental, permanent supportive housing, transitional housing, and emergency shelter) based upon their score without denying them based on barriers. Coordination of this process, including policies, procedures and documents, are the responsibility of the Coordinated Entry/HMIS Committee and the Planning Committee of the Homeless Action Council.

Addressing the emergency shelter and transitional housing needs of homeless persons

The HRC also operates a Homeless Hotline that has proven to be a critical element in assisting the homeless to access shelters and supportive services such as food stamp assistance and clothing. The HRC receives requests for assistance through telephone calls and walk-in visits from homeless individuals and families. Those persons or families who are not eligible to be assisted with HRC funds are referred to appropriate agencies or shelters.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

All homeless individuals enter through the Single Point of Entry and are assigned to the appropriate housing, which may include emergency or transitional locations while waiting for a permanent housing slot to open. The CoC has emergency shelters specifically for victims of domestic violence, and a general shelter for adult males and females (single or with children). There are also transitional housing units available for different populations. Hotel vouchers are used as needed if a household is not shelter appropriate or if there are no current open slots in our emergency shelters or transitional housing programs. St. Clair County COC and St. Clair County Housing Authority has partnered to issue 48 Emergency Housing Vouchers. To date the program has been successful.

CDBG funds and staff are provided to the Housing Resource Center to help prevent families from being evicted from their homes. The HRC also uses IHDA funds to provide rental assistance to low income residents who homeless or near homelessness.

To help individuals and families avoid becoming homeless, St. Clair County IGD's Community Action Agency, Community Services Group operates an Emergency Crisis Intervention Program that provides emergency assistance to eligible households and individuals that have experienced: job loss; unforeseen circumstances; major medical expenses; are actively enrolled in a training or education program; are employed; or actively seeking employment. The program provides up to two month's rental/mortgage payments, automobile repairs, automobile payments, child care co-pays, public transportation and emergency hotel assistance. The program provides assistance for dental, medical, prescription or extension of insurance coverage bills as appropriate. During the Holiday Season the program provides food certificates. IHDA has also provided over 7 million in rental assistance this year for residents/landlords of St. Clair County to prevent homelessness.

With regard to CDBG funds, IGD's application process solicits applications from social service agencies that provide direct services to individuals. St. Clair County Housing Resource Center is the coordinated entry provider for the St. Clair County COC. This is first point for individuals to receive services. The HRC makes referrals to social service providers based on the specific needs of individuals, including those who are leaving the foster care or criminal justice systems or who have been experiencing homeless, etc.

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

St. Clair County is not an Emergency Solutions Grant recipient and has no goals in its Consolidated Plan for helping homeless individuals and families make the transition to permanent housing and independent living.

The participants in the Continuum of Care work closely together to meet the needs of homeless individuals and families through the continuum of services coordinated through the partnership . As a recipient of State ESG grant funding, participants of the CoC provides technical assistance for the planning efforts and provides a framework through the ESG funding process to focus attention on specific programmatic areas. The homeless system is constantly being assessed by the COC and continues to evolve to address the homeless goals.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The St. Clair County Housing Authority (SCCHA) provides affordable housing to more than 3,200 families through its Public Housing (approximately 950 units), Section 8 Housing Choice Voucher (approximately 2,250 families), Rural Housing (24 units), and Section 8 Multi-Family (22 units) programs.

SCCHA works cooperatively with IGD to address the housing needs of low-income families, especially those in special-need and/or disaster situations. SCCHA is represented on the St. Clair County Continuum of Care Board and serves on the Workforce Innovation and Opportunity Act (WIOA) Board, currently co-chairing its adjunct Youth Council sub-committee.

SCCHA continues to develop relationships with not-for-profits and other developers to expand the supply of affordable rental housing in St. Clair County. Most of this activity is achieved through SCCHA's Project-Based Voucher Program.

SCCHA continues to work to improve the quality of its public housing inventory through the Capital Fund Program, routine and preventive maintenance program, and improved management operations. All public housing properties underwent HUD REAC (Real Estate Assessment Center) inspections during the 2015 – 2019 inspection cycles (REAC inspections have been suspended since 2020 due to the Covid-19 pandemic). All properties passed the inspections. SCCHA is working to address the physical deficiencies at the properties receiving the lowest scores on HUD's assessment protocol. The Authority remains committed to having all its public housing properties pass future rounds of HUD REAC inspections, with the following exception: SCCHA submitted and received HUD approval for demolition of fifty-two (52) public housing units in the Ernest Smith Sr. Apartments (ESSA) that were determined functionally obsolete and/or to have excessive repair/renovation costs. SCCHA received Tenant Protection Vouchers to facilitate the relocation of the households involved. Further, SCCHA anticipates submitting a second demolition application for the remaining 106 family public housing units in the #30-08 development located in the community now known as Cahokia Heights (formerly known as Centreville ---the communities of Cahokia, Centreville and Alorton merged to create the new entity of Cahokia Heights in 2021). SCCHA also plans to carefully consider and assess the viability of the available "repositioning" options for its public housing inventory. HUD is encouraging public housing authorities to transition public housing properties to one or more of the Section 8 programs (such as RAD – PBV (rental assistance demonstration program with project-based vouchers) or PBRA (project based rental assistance)) or take other actions to improve or replace aging public housing properties with capital improvement needs greater than funding available through HUD. SCCHA anticipates that "repositioning" of its public housing properties will include varied actions such as demolition, RAD-PBV, PBRA, and other renovation and/or redevelopment initiatives. SCCHA anticipates the public housing units in O'Fallon (20 family units) and

Lebanon (24 family units) will be its initial “repositioning” undertaking.

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

The majority of SCCHA public housing residents are represented by duly elected Resident Councils (RC). SCCHA supports these RCs 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 related to the development and annual update of its Agency Plan. Family Resource Centers are in operation at the two large public housing developments in Centreville. SCCHA has a Senior Services Coordinator to assist elderly and disabled residents and to coordinate activities for seniors.

Due to reductions in administrative fees the Authority has been unable to implement a homeownership component to its Section 8 Voucher Program to allow eligible households to utilize Section 8 assistance to purchase homes. It is, however, likely that former public housing residents/Section 8 HCVP participants have utilized the County’s Homebuyer Assistance Program to achieve homeownership but did not disclose the details of their transition from federally assisted housing programs.

Actions taken to provide assistance to troubled PHAs

N/A

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The County's home improvement assistance, homebuyer assistance and housing development programs build self-sufficiency and prosperity for its residents. Funded programs and services help transform impoverished communities and change lives. These programs have been used to practice sound economic, environmental and social policy. The County has directed significant investments into the County's existing housing stock to give it new life. Funds have also been directed to eradicating lead paint, to weatherize homes, make homes energy efficient, and making modifications to homes to allow disabled residents to live independently in their homes. The County's CDBG and HOME program investments have helped families stay together, strengthened communities, and improved the health, vitality, and sustainability of the County.

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. Work on these improvements is currently underway. 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.

Many individuals and advocates encounter regulatory barriers in multiple communities. These barriers include "crime free housing" efforts that have come under fire by local Fair Housing entities. These efforts in the form of local ordinances are being challenged because they have the potential to restrict individuals from accessing/maintaining housing. Communities that haven't been educated often struggle with NIMBY (not in my backyard) issues and publicly express distain for these individuals residing in their communities. In rural areas of the state, many individuals with disabilities face barriers associated with low housing stock available throughout the community as well as transportation issues due to geography of communities making it difficult for individuals to reach much needed services. While St. Clair County IGD does not have any

jurisdiction over local “crime free housing ordinances,” the potential threat to fair housing requires that IGD track and understand these new policies. As such, IGD continues to research these ordinances and the potential fair housing consequences and through conversation with other political jurisdictions in the state of Illinois and, if necessary, will develop action steps accordingly.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Homebuyer assistance, acquisition/rehab and new affordable home construction are more difficult in the County’s older, poorer, minority communities due to nearby blight, crime, declining economic base, school districts with lower performance levels, and infrastructure needs that exceed available community resources. The County has focused both CDBG public facility improvement funds as well as CDBG and HOME housing program funds in these communities. These communities do not have the resources on their own to address these needs adequately (i.e., providing affordable, decent, safe, and sanitary housing; clearing of slums and blighted conditions; and undertaking needed public facilities improvements).

The funding necessary to fully meet the needs of public facility, neighborhood improvement, infrastructure, public service, housing, economic development and planning activities in the County would literally require billions of dollars. Underserved needs exist in each of these areas. The County is at a profound disadvantage in removing or eliminating obstacles to meeting these underserved needs due to the generally shrinking amount of CDBG and HOME funds that have been available to the County in recent years. The overall decline in CDBG funding for more than a decade has made it extremely difficult to fund those programs that have provided much needed services over the years and almost impossible to fund new programs that might address underserved needs of County residents. As a result, the County has continued to work with other regional, state, and federal partners generally to address underserved needs as well as it can.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

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 and brochures 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.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The County has undertaken a number of initiatives that are consistent with a long-term approach to reducing poverty levels. The County assists low-income people by allocating CDBG and HOME funding to home improvement and homeownership assistance programs, to public facilities and improvements, and to a senior/disabled person home accessibility improvement program. The County applied for and administers two enterprise zones to provide incentives to businesses with materials sales tax exemptions and tax abatement in order to provide or retain jobs for low income persons. All of these activities benefit lower income persons and serve to improve their economic status and well-being.

In addition, the County’s Community Services Block Grant (CSBG) program provides small business loans through the St. Clair County Economic Development Department and emergency assistance to eligible individuals and families whose incomes are at or below 125% of the

federal poverty income guidelines that have experienced job loss; significant reduction in hours worked; unexpected medical emergency expense; or emergency approved through CSBG assessment. Services include rental and mortgage assistance, medical, dental and prescription vouchers, lice kits, automobile repairs, automobile payment, child care co-payments, youth enrichment programming, school supplies, prevention of drug abuse and alcoholism, other emergency services for veterans, health and safety, home repair/ rehabilitation, shelter information and referral, transportation, emergency food, and emergency hotel assistance for fire and natural disaster victims.

The CSBG strategy is to continue to increase the scope, availability and methods of outreach to special service groups and other protected class groups and to continue to build stronger alliances with other community stakeholders that serve the low-income population. The economic forecast for low-income residents continues to be bleak and can be expected to contribute to recurrences of underemployment, unemployment, home foreclosures, reduction in work hours, and lack of healthcare. The CSBG program plays a major role in rebuilding communities with resilience while changing lives. For this reason, its strong advocacy for low-income individuals and families must continue by telling the stories of individuals and families that have become self-sufficient because of the resources provided through it.

The County can most effectively fight poverty over the long term by promoting economic development, especially job intensive industries; we provide employment readiness and training services to those in need thru our WIOA programs; building the tax base so that basic County services and “safety net” services can be maintained; and helping low-income households purchase homes in neighborhoods where housing values are likely to increase. Unfortunately, these efforts, backed by extremely limited funds, are unlikely to have a significant impact on the total number of poverty level families in St. Clair County.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The County Intergovernmental Grants Department has sufficient institutional structure to carry out the activities of the CDBG and HOME programs. The department has three “client-servicing” Groups: Community Development (CD); Community Services (CS); and Workforce Development (WD). CD administers multiple Weatherization grants, the Community Development Block Grant (CDBG), HOME Investment Partnership Grant and multiple Illinois Housing Development Authority Grants. CS administers Community Services Block Grant (CSBG), Low Income Home Energy Assistance Program (LIHEAP), and HUD Continuum of Care grants in conjunction with the St. Clair County Homeless Action Council. WD administers Workforce Innovation and Opportunity Act (WIOA) and other grants providing Employment and Training Services.

These grants provide extremely low-, very low-, low- and moderate-income individuals and households with energy, medical, rental and mortgage assistance; employment counseling and training; housing repairs, housing rehabilitation, fair housing counseling, home buyer

assistance and counseling, housing accessibility grants, lead-based paint hazard reduction and many other services. St. Clair County's Consortium with the City of Belleville and East St. Louis provides housing activities in all participating jurisdictions in St. Clair County.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The County works with non-profit agencies and public institutions, such as homeless services and housing providers through the Homeless Action Council, coordinating the application and reporting on HUD Continuum of Care grants; various social service providers to coordinate other services and programs; and Community Housing Development Organizations (CHDO's) to provide affordable housing in Centreville, Alorton, Belleville and Cahokia.

IGD works with a number of County agencies to provide coordination of services and programs, including the Health Department, Housing Authority, Zoning Department, Data Processing Department, Regional Office of Education; Highway Department and the Emergency Services Agency.

The St. Clair County Housing Authority (SCCHA) Board of Commissioners is appointed by the St. Clair County Board Chairman and approved by the St. Clair County Board, the legislative body of St. Clair County government. The SCCHA and IGD have a close working relationship, sharing plans, goals, and reports with each other. The SCCHA notifies IGD of its provision of services, proposed development and demolition and/or disposition of public housing developments. Hiring, contracting and procurement for the SCCHA are generally handled by its Executive Director, with approval by the Board of Commissioners when required.

IGD also works with foundations and other local, regional and State agencies, such as the Southern Illinois Healthcare Foundation, FOCUS St. Louis, City of East St. Louis Office of Community Development, East St. Louis Housing Authority, Madison County Office of Community Development, area elementary and high school districts, East Side Health District, Southwestern Illinois Development Authority (SWIDA), Leadership Council of Southwestern Illinois, St. Louis Lead Prevention Coalition, Southwestern Illinois Planning Commission, the Illinois Departments of Public Health, Healthcare and Family Services, Rehabilitation Services, Human Services and Commerce and Economic Opportunity, the Illinois Housing Development Authority, as well as local elected and appointed officials.

The County strives to continuously expand and strengthen its partnerships with local, State and Federal government agencies and with local nonprofit organizations, to increase the production and management of affordable housing and to provide for a more suitable living environment for its low- and moderate-income residents.

IGD currently coordinates the Workforce Investment Opportunity Act (WIOA) Program in St. Clair, Clinton, Monroe, Randolph and Washington Counties. Local Workforce Area (LWA) #24 provides employment and training services through the Mid-America Workforce Investment Board, comprised of businesses, economic development, education, labor and community-based organizations, and partners in local One-Stop Centers. The partners include:

- 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.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The County's June 2020 Assessment of Fair Housing indicates that economic pressures and municipal or State services and amenities are highly significant determinants of segregation. To address economic pressures, the County has continued working with financial institutions to assist them in making Community Reinvestment Act investments and loans in lower income areas. The County is also working with the American Bottoms Enterprise Zone, which provides incentives to businesses who locate in several low income communities. To relieve residents of the economic pressures of expensive home repairs and lead-based paint removal, the County's single-family rehab programs address building code and lead-based paint hazards that ensure affordable housing and help keep people in their homes. The housing rehab program application list filled through a lottery system and there are no guarantees that households with EBL children will be chosen. However, once the County learns of children with elevated blood levels of lead 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. Since 1995 the County has submitted applications for HUD Lead Hazard Reduction Funds to address lead hazards in housing.

County staff also continues to attend meetings with lenders and realtors to educate both of the benefits our programs that provide to assist low-

income buyers with their home purchases.

To address municipal or State services and amenities the County has continued to allocate a large portion of its CDBG funds to make grants to lower income communities to address infrastructure issues.

Our Fair Housing Assessment identifies the lack of fair housing education as a moderately significant determinant of segregation. To address this, the County requires housing counseling services for clients participating in homebuyer programs, clients utilizing homeless services programs and Community Service Block Grant programs. Staff met throughout the 2020 program year with individual lenders and realtors to provide fair housing education and information. County staff also provided training materials via e-mail and mail to all municipalities in PY 2020.

One of the high priority goals identified in our Fair Housing Assessment is to increase the supply of accessible housing units for persons with disabilities. In furtherance of this goal, the County has continued to coordinate with LINC and DORS to provide services for persons with disabilities. We provide grants specifically for making modifications to homes for person with disabilities as well as addressing any modifications necessary through our home rehab forgivable loan programs and our home rehab 2.5% loan program.

CR-40 - Monitoring 91.220 and 91.230

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

St. Clair County monitors programs to determine if progress is being made in addressing its Consolidated Plan priorities. To ensure compliance with program and comprehensive planning requirements, the County has established quality standards and performance goals. All programs and projects are administered through contracts. The County maintains complete program and financial reports. All contracts and program guidelines include appropriate CDBG and/or HOME statutory and regulatory citations as required. County-administered projects are monitored using the following major criteria:

- Compliance with all applicable federal rules concerning accessibility; lead-based paint; housing quality standards; labor standards and other federal requirements.
- Compliance with income criteria, residence and ownership requirements, construction or rehabilitation standards and total project cost and average cost per unit standards.
- Benefit to low- and moderate-income people. All program participants are required to submit current income data that is verified by County staff.
- Residency is verified through County property tax receipts that are required as part of program applications. Ownership is verified by requiring that program applicants furnish a copy of a fully marketable title to the subject property or a leasehold interest in the property.
- Housing rehabilitation is monitored using predetermined and pre-agreed upon completion schedules and dates. Rehabilitation contractors are normally allowed 45 days to complete work. The schedule is established following execution of a grant/loan agreement. The number of completed units is compared to a completion schedule to monitor production. Federal lead-based paint regulations have had a significant impact on performance completions in the housing rehabilitation program.

County staff reviews Integrated Disbursement Information System (IDIS) Timeliness Reports on a monthly basis to track the rate of CDBG expenditures. The County also reviews the IDIS Timeliness Reports, Dashboard and Snapshot on a monthly basis to track the accuracy and timeliness of its HOME expenditures.

On-site building inspections are performed prior to, during, and when construction is complete to ensure quality workmanship and compliance with local building codes, county housing maintenance or new construction standards, HUD Housing Quality Standards or other appropriate standards. The County Zoning Department provides new housing construction inspections for all new HOME-assisted housing construction.

IGD inspectors perform routine inspections of all HOME-assisted rental housing to ensure the units continue to meet housing standards and tenants meet income eligibility requirements. Sub-recipients are monitored for file compliance as well as procurement and other federal requirements. To ensure long-term compliance with HOME program affordability requirements, the County files liens that incorporate HOME Recapture provisions on all properties assisted with HOME funds.

IGD records mortgages or rescission contracts for all housing programs, which ensures long term compliance.

All advertisements are in the Belleville News-Democrat and the East St. Louis Monitor. Ads generally feature inclusive language encouraging minority and women participation. For public facilities, a list of minority business is kept and updated annually, and all public facilities bids must include this list in the bid document.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

St. Clair County emphasized citizen and community input in the development of the PY 2020 CAPER. The County has a large geographic area, with contrasting areas of urban, suburban, and rural populations, with diverse needs for each segment. Staff provides a process and method for the public to comment, complain, compliment, or submit suggestions. The hearing presentations contain visual and printed materials (English and Spanish), with contact names, phone numbers, mailing addresses, and e-mail addresses. At each hearing staff asks for suggestions or comments on future programs, how future funds should be spent, local needs, and comments on past IGD/County performance. By combining citizen/community suggestions regarding the past year performance, along with the input on the development of activities for the new program year, the County benefits from a more comprehensive picture of area needs and can develop activities most appropriate to the new year.

The County conducted a public hearing dedicated to the PY 2020 CAPER on 9/22/21. The hearing was held at 10:00 a.m. on Facebook Live. On 9/02/21 a notice of the public hearing was placed in the Belleville News Democrat and the East St. Louis Monitor, and the hearing was advertised on the County website. The County provided the public with visual materials showing the amount of CDBG and HOME funds it received, a description of the range of types of activities that were funded with these resources, as well as activities conducted in their

communities to show citizens and elected officials how their community compared to all others receiving projects and funds. No requests for special arrangements (special needs or translators) were received.

This Program Year 2020 Consolidated Annual Performance Evaluation Report (CAPER) was made available to the public from November 11, 2021 through November 29, 2021. The notice was published in the local papers and on the County website on November 11, 2021. The final CAPER is being submitted to HUD after allowing more than the required 15-day period for comments. No public comments were received. Any comments received after the submission of the CAPER, and the County's responses, will be forwarded to HUD.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Performance on the housing program goals will be reviewed next year to monitor progress towards our five-year goals. If at that time we determine that we will be unable to meet our goals, we will undertake a substantial amendment to our five-year plan. Given the unpredictable impacts of the COVID-19 pandemic on our PY 2020 performance, we believe that reviewing our performance at the end of PY 2021 will provide us with the information necessary to ensure that realistic goals are in place for the remainder of our five-year Consolidated Planning cycle.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Two units in the Wingate property and two units in the Metro East Landing property were inspected by County staff in PY 2020. All four units in both properties passed inspection. Based upon the schedule, there were no units that should have been inspected that were not inspected.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

In accordance with 24 CFR Part 511.13, and in furtherance of the County's commitment to nondiscrimination and equal opportunity in housing, the County requires an Affirmatively Furthering Fair Housing Marketing Plan for all HOME-assisted housing containing five or more units. The AFFH Marketing Plan is designed to provide information to, and attract eligible persons from all racial, ethnic, and gender groups in the housing market to the available housing. All non-profit organizations, CHDOs, owners, and other prospective participants in the HOME Housing Development Program are required to enter into an agreement with the County confirming their agreement to use an AFFH Marketing Plan for any project containing five or more units.

HOME Affirmative Marketing Procedures for Developers

County IGD informs all potential/ prospective HOME housing development program participants of the County's policy on affirmative marketing. The County uses the Equal Housing Opportunity logotype or slogan in all press releases, pamphlets, solicitations for owners, and other written communication to fair housing and other groups.

- All non-profit organizations, CHDOs, owners, and other prospective participants in the HOME housing development program are required to confirm through a written agreement that they will comply with all applicable fair housing laws.

- Owners must explicitly agree not to discriminate against prospective tenants on the basis of their receipt of, or eligibility for, housing assistance under any federal, state, or local housing assistance program (except for a project for housing elderly persons) or on the basis that tenants have a minor child who will be residing with them.
- Owners must agree to adhere to the AFFH Marketing Plan by assuring the display of the fair housing poster, and the use of Equal Housing Opportunity logotype or slogan in press releases, advertisements, flyers, announcements, and other forms of community contact or solicitation, which makes known the availability of housing units.
- Owners must assure the special outreach to persons who are not likely to apply for housing.
- Owners must agree to undertake the AFFH Marketing requirements for at least the period of affordability per HOME regulations.

Affirmative Marketing Monitoring

County IGD Community Development staff will review and assess the AFFH Marketing actions of participants in the HOME housing development program for a period of five years, not to exceed fifteen years, following the completion of rehabilitation or construction. Participants with AFFH Marketing deficiencies will be given a written statement, which will define the deficiencies, and provide an opportunity for corrective action. Each participant will be informed that failure to comply with the AFFH Marketing requirements within a specified period may result in disqualification from further participation in the HOME housing development program, or other similar programs administered by the County.

County IGD Community Development staff will review the HUD Form 935-2A completed by the developer to ensure that a good faith effort was made by the developer. All records of the AFFH Marketing monitoring will be maintained by IGD and assessed annually.

Fair housing and civil rights agencies and organizations operating within the St. Clair County jurisdiction outside of IGD that may assist in fair housing analysis and investigation, or who otherwise have expertise in affirmatively furthering fair housing for their clients, include:

- The Metropolitan St. Louis Equal Housing and Opportunity Council
- Land of Lincoln Legal Assistance Foundation
- Living Independently Now Center
- Chestnut Health Systems

Additionally, the St. Clair County IGD supports a variety of fair housing activities. IGD also offers housing counseling and education and promotes fair housing throughout St. Clair County. Additionally, the Housing Resource Center (HRC) also operates under the IGD umbrella. HRC operates Continuum of Care Programs for the homeless and near homeless, as well as administers fair housing and other housing counseling and education efforts.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

With \$97.59 on hand, in PY 2020 \$508,495.89 in HOME program income was received and \$470,414.28 was expended, leaving a balance on hand of \$38,179.20. \$469,814.28 was drawn for the acquisition and rehabilitation of five single-family homes by Community Housing Development Organizations; \$600.00 was drawn for single-family rehab assistance provided to low-moderate income homeowners.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

In PY 2020 the County provided down payment and closing cost assistance to 19 low-moderate income homebuyers. We conducted meetings with individuals from Realtors Association of Southern Illinois and the Metro East Lending Group to keep them up to date regarding opportunities to assist their clients in accessing our program and for them to leverage their resources to foster affordable housing. We made loans to 25 low-income households that completed home repairs, including 4 loans to complete emergency home repairs.

The County's Economic Development Department continued to provide services to attract businesses and job creation to the County, including the administration of two Enterprise Zones and a number of TIF districts that provide business attraction incentives. The expansion and attraction of businesses, and corresponding growth in employment is intended, in part, to help increase property values in distressed areas, thereby making affordable housing development more financially feasible.

CR-58 – Section 3

Total labor Hours	CDBG	HOME
Total Number of Activities	3	0
Total Labor Hours	0	0
Total Section 3 Worker Hours	0	0
Total Targeted Section 3 Worker Hours	0	0

Qualitative Efforts – Number of Activities by Program	CDBG	HOME
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	3	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	3	0
Direct, on-the job training (including apprenticeships).	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	3	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	3	0
Held one or more job fairs.	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	3	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	3	0
Assisted residents with finding child care.	3	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0

Assisted residents to obtain financial literacy training and/or coaching.	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0
Provided or connected residents with training on computer use or online technologies.	3	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	3	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	3	0
Other.	3	0

Narrative:

St. Clair County’s 2020 CDBG Public Facilities contracts were signed in January of 2021 and allow 18 months for completion; therefore, these contracts did not incorporate the newly released Section 3 Program requirements. However, all PY 2021 contracts will reflect the new Section 3 standards and reporting requirements. Despite this, St. Clair County does engage in many of the qualitative efforts described above. Currently, IGD has three public facilities contracts that exceed \$200,000. The activity numbers above reflect efforts undertaken by IGD and WIOA. The Workforce Innovation and Opportunity Act (WIOA) program is housed on the same floor as the CDBG program in the St. Clair County administrative offices, and many of the efforts overlap, with IGD frequently referring residents to WIOA for assistance with childcare, resume writing, job and education referrals, and so on. Going forward, IGD will track qualitative Section 3 outreach efforts and assistance in order to provide more comprehensive reporting in future program years.