



St. Clair County, IL  
Program Year 2024  
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)**

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 2024, the County provided affordable housing assistance to 43 low-moderate income households. Thirteen (13) households received homebuyer assistance and twenty-one (21) received HOME rehab assistance. Using HOME funds, two (2) housing units were assisted and completed by CHDO developers and two (2) units of affordable rental housing were completed. Three (3) households received CDBG assistance for emergency repairs and two (2) households received CDBG assistance for accessibility modifications, bringing the total of single-family rehabs completed to twenty-six (26).

Fifteen (15) public facilities and infrastructure improvement projects in low-moderate income areas were completed in PY 2024. These represent 94% of our goal of sixteen (16) projects. However, our five-year goal was to complete 78 projects, and we have completed 86 projects which is 110% of our five year goal.

With fourteen (14) single-family for-sale homes completed over our 5-year planning period, we are at 93% of our five-year goal of constructing fifteen (15) new homes. A further two homes are under construction, with one at 91.43% completion and the other at 74.27% completion. Additionally, one new construction rental development consisting of two (2) units was completed and a further rental development that includes four (4) units is under construction at 96.76% completion.

In PY 2024, we expended \$77,612.66 of CDBG-CV funds for public service activities and \$27,831.61 for administration of CDBG-CV funds. We are currently working with a not-for-profit to acquire and rehab/build non congregate housing for the homeless. An agreement to commit CDBG-CV and HOME-ARP funds has been executed.

**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	10	100%	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	0	N/A
Homebuyer Assistance	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	90	82	91%	10	13	130%
Public Facilities Improvements	Non-Housing Community Development	CDBG: \$ / HOME: \$	Other/ Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Other/ Persons Assisted	80	73	91%	19	19	100%
Public Services Programs	Non-Housing Community Development	CDBG: \$ / HOME: \$	Other	Other	18	16	89%	0	0	-
Affordable Housing Development	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	15	14	93%	4	4	100%
Single-Family Rehab Programs	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	92	107	116%	35	26	74%

**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 PY 2024, one (1) public service activity was completed, although there was no goal for Public Services in the PY 2024 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-PY 2024 goal for public facilities and improvements was to complete 80 projects. In PY 2024, fifteen (15) public facilities and improvement projects in predominantly low-moderate income areas funded with CDBG have been completed, representing 94% of our annual goal. However, our five year strategic goal was complete 78 projects, and we have completed 86 projects, representing 110% of our strategic goal.

**Housing Rehabilitation:** The County's PY 2020-2024 goal for single-family rehab is to complete 92 projects and in PY 2024, we completed 26 projects, falling short of our annual goal of 35 projects. However, overall, we have completed 107 projects, which represents 116% for our strategic five-year Consolidated Plan goal of 92 projects.

**Homebuyer Down Payment Assistance:** The County's PY 2020- 2024 homebuyer assistance goal is to provide assistance to 90 low-moderate homebuyers, with a goal of 10 in PY 2024. In PY 2024, we assisted thirteen (13) homebuyers, which is 130% of our annual goal and which brings us to 91% of our five-year goal.

**Affordable Housing Development:** The County set a goal of 4 affordable homes to be developed with HOME assistance in PY 2024. Two (2) homes were completed by CHDOs (100%) and a further two (2) affordable rental homes were completed. Additionally, another rental development with 4 homes is under construction. The County's five-year goal for affordable housing development is 15 homes completed, and 14 have been completed and a further two are nearing completion at 91% and 74% completion.

## 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	4	16
Black or African American	1	20
Asian	0	0
American Indian or American Native	0	0
Other- Multi-Racial	0	0
<b>Total</b>	<b>5</b>	<b>36</b>
Hispanic	0	1
Not Hispanic	5	36

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

### Narrative

In PY 2024, direct benefit activities implemented with CDBG and HOME funds, all housing programs, benefited 43 households. Of these 43 households served in PY 2024, twenty (20) were White, with one individual identifying as Hispanic, twenty-one (21) were Black or African American, and one identified as a Multi-Racial household. 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. Further, the two (2) affordable rental homes that were completed are not yet occupied, so we are unable to report race/ethnicity and income information for this project on the PY 2024 CAPER.

## 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	3,711,092.00	2,816,736.33
HOME	HOME	1,173,969.01	1,450,988.03
HOPWA	HOPWA	0	0
ESG	ESG	0	0
Section 108	Section 108	0	0
Other	Other		

**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, 36.9% of the total investment occurred in East St. Louis and 63.1% occurred in Belleville and the remaining portion of St. Clair County.

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.

With \$1,010.00 on hand, in PY 2024 \$146,874.44 in HOME program income was received and \$147,824.44 was expended, leaving a balance on hand of \$60.00. \$6,736.00 was spent on housing rehab activities, \$620.00 was spent on homebuyer activities, and \$140,468.44 was spent on CHDO acquisition/rehab activities. The \$60.00 balance on hand was expended, for a homebuyer assistance activity, and will be reflected in next year's CAPER.

**Identify the geographic distribution and location of investments**

<b>Target Area</b>	<b>Planned Percentage of Allocation</b>	<b>Actual Percentage of Allocation</b>	<b>Narrative Description</b>
East St Louis	28	7.61	Other
East St Louis (Area Benefit)		21.89	Other
East St Louis (Low/Mod Income Household Benefit)		0	Other
East St Louis (Low/Mod Income Housing Benefit)		7.45	Other
East St Louis (Low/Mod Income Job Benefit)			
St. Clair County & City of Belleville	72	11.84	Other
St. Clair County & City of Belleville (Area Benefit)		25.97	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)		25.24	Other
St. Clair County & City of Belleville (Low/Mod Income Job Benefit)		0	Other

**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, 2024, through September 30, 2025, the Low-Income Home Energy Assistance Program (LIHEAP) obligated \$4,104,282 in State and Federal funds to assist 6,091 income-eligible households with their energy costs. This assistance was in the form of a one-time payment paid directly to the customers' utility provider. The LIHEAP program includes a Reconnection Assistance component which assists households with restoration of utility service and/or prevention of service disconnection. This year our program paid out \$916,047 in reconnection assistance benefits.

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 2024.

- 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

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	1,105,512.51
2. Match contributed during current Federal fiscal year	51,249.23
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,156,761.74
4. Match liability for current Federal fiscal year	206,017.32
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	950,744.42

**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
4423	10/23/2024			13,950.00		896.76		14,846.76
4422	11/01/2024			34,625.00		1,777.47		36,402.47

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 beginning 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 \$
1,010.00	146,874.44	147,824.44	0	60.00

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	1,225,072.20	0	0	42,002.45	0	1,183,069.75
Number	24	0	0	2	0	22
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	1,225,072.20	0	1,225,072.20			
Number	24	0	24			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 - Minority Business and Women Business Enterprises**

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

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – 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	32	24
Number of Special-Needs households to be provided affordable housing units	3	2
<b>Total</b>	<b>35</b>	<b>26</b>

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	4	4
Number of households supported through Rehab of Existing Units	35	26
Number of households supported through Acquisition of Existing Units	10	13
<b>Total</b>	<b>49</b>	<b>43</b>

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 four (4) homes to be completed in PY 2024. Four homes have been completed, two (2) by CHDOs and two (2) additional rental homes. A further two (2) homes are under construction by CHDO's and will reach completion before the end of the year. The County's five-year goal for single-family housing development is 15 homes completed, so with 14 completed and one more at 91% completion, we will meet the County's five-year goal by the end of the calendar year.

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 2024 goal was to provide 35 households with home rehab assistance. We completed 26 projects during the program year (74% of our annual goal). However, our five-year goal for this activity is to complete 92 projects and we have exceeded this goal by completed 107 projects.

The number of households supported through the acquisition of existing units includes households assisted through our HOME-funded Homebuyer Assistance Program. Our PY 2024 goal for this activity was for 10 households to be assisted, and we assisted 13 homebuyers (130% of our annual goal). However, with 82 projects completed during the five-year planning cycle, we fell short of our five-year goal of 90 projects.

**Discuss how these outcomes will impact future annual action plans.**

As noted, the COVID-19 pandemic impacted the County's priorities and achievements, and the 2020-2024 Consolidated Plan was amended to reduce goals that were unable to realistically be met during the remaining years of the five-year Consolidated Plan cycle. However, we still fell slightly short of meeting our five-years goals for homebuyer assistance and HOME acquisition/rehab projects.

**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.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	5	7
Low-income	0	20
Moderate-income	0	9
<b>Total</b>	<b>5</b>	<b>36</b>

**Table 13 – Number of Households Served**

## **Narrative Information**

Of the thirty-six households served by activities where information on income by family size is required in the 2024 program year, 19.4% were extremely low-income, 55.6% were low-income and 25% were moderate-income. No homeless were served.

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 2024, two of these loans were made.

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 individuals living in seriously substandard housing. Our efforts to improve housing conditions include the provision of 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.

## **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 East St. Louis/Belleville/St. Clair County Continuum of Care (CoC 508) coordinates community-wide efforts to prevent and end homelessness through collaboration among public agencies, nonprofit organizations, and service providers. Within this framework, the Homeless Action Council serves as a coalition of partner agencies that refer clients to the Housing Resource Center (HRC)—a division of the Intergovernmental Grants Department's Community Development Group. The HRC functions as the primary point of entry for individuals and families seeking assistance and serves as the CoC's Coordinated Assessment Center, ensuring consistent screening, assessment, and referral to appropriate housing and support services.

The HRC provides triage services to quickly connect individuals and families experiencing homelessness with housing and supportive services based on their needs and preferences. Using WellSky Community Services, the CoC's Homeless Management Information System (HMIS), the HRC conducts comprehensive assessments that meet all HUD data requirements and support coordinated referrals across the crisis response system. The Coordinated Intake process prioritizes those with the greatest vulnerability, linking each household to the most appropriate housing option from the start. This approach strengthens prevention and diversion efforts, improves system efficiency, and promotes collaboration among community partners.

The CoC prioritizes quickly connecting individuals and families to housing options without requiring them to meet preconditions or address barriers beforehand. Anyone entering the system is assessed using a standardized tool that determines their level of vulnerability and assigns a corresponding score. Based on that score, individuals are matched to the appropriate placement option—including private rentals, permanent supportive housing, transitional housing, and emergency shelter—without being denied due to personal circumstances or challenges. Oversight of this coordinated process, including related policies, procedures, and documentation, rests with the Coordinated Entry/HMIS Committee and the Planning Committee of the Homeless Action Council. CoC agencies continue to apply for renewal and new project funding through the U.S. Department of Housing and Urban Development, as well as seek additional resources from other sources. Each year, CoC agencies also secure funding through the Illinois Department of Human Services to support prevention, emergency shelter, and diversion programs.

### **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.**

The Continuum of Care (CoC) works to prevent homelessness by identifying and assisting low-income individuals and families who are at risk of losing housing or being discharged from publicly funded institutions without stable housing in place. Through the Single Point of Entry, households are screened for both immediate housing crises and early signs of instability, allowing staff to connect them with prevention and diversion resources before homelessness occurs.

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 helps with 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. Also, 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 are homeless or near homeless.

The CoC collaborates with local hospitals, mental health facilities, foster care programs, and correctional institutions to ensure discharge planning includes appropriate housing and support services. Individuals who do experience homelessness are connected to suitable shelter or

transitional housing while awaiting permanent housing placement. The CoC maintains emergency shelters for victims of domestic violence and general shelters for adults and families, with hotel vouchers available when other options are unavailable or inappropriate.

To address the broader needs that contribute to housing instability, the CoC partners with Chestnut Health Systems, Eastside Health District, and Comprehensive Behavioral Health to meet participants' physical and mental health needs. The St. Clair County Workforce Development Office helps connect individuals to employment and training opportunities, while the Regional Office of Education ensures school-age youth have access to education consistent with McKinney-Vento requirements. Additionally, the Urban League of Metropolitan St. Louis provides targeted assistance for youth, helping prevent homelessness among young adults exiting foster care or other systems.

**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.**

The CoC assists homeless individuals and families—including those who are chronically homeless, veterans and their families, families with children, and unaccompanied youth—in making the transition to permanent housing and independent living. Through the Coordinated Entry process and use of WellSky Community Services, households are assessed and connected to the most appropriate housing intervention, including rapid rehousing, permanent supportive housing, and transitional housing. The CoC works to shorten the duration of homelessness and increase exits to permanent housing by streamlining referrals and expanding partnerships across health, behavioral health, employment, and education systems. During the most recent program year, the average length of time homeless decreased to 116 days, down from 213 the prior year, and 65% of households exited to permanent housing, an increase from 59%. The CoC also implements prevention and diversion strategies to reduce returns to homelessness and collaborates with local housing providers to expand access to affordable units, ensuring individuals and families can maintain long-term housing stability.

## **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) plays a vital role in providing affordable housing solutions to over 3,200 families within the community. This is accomplished through a variety of programs, including approximately 848 units of Public Housing, around 2,250 families benefiting from the Section 8 Housing Choice Voucher program, 24 units designated for Rural Housing, and 22 units under the Section 8 Multi-Family program. By offering these diverse housing options, SCCHA addresses the pressing need for affordable living spaces, ensuring that low-income families have access to safe and stable homes.

In its commitment to serving low-income families, SCCHA collaborates closely with the Illinois Department of Human Services (IDHS) to tackle the unique housing challenges faced by those in special needs or disaster situations. The authority is actively involved in the St. Clair County Continuum of Care Board, which focuses on comprehensive strategies to combat homelessness and housing instability. Additionally, SCCHA participates in the Workforce Innovation and Opportunity Act (WIOA) Board, where it participates in the Youth Council sub-committee, emphasizing its dedication to fostering opportunities for young individuals in the community.

To further enhance the availability of affordable rental housing in St. Clair County, SCCHA is committed to building partnerships with non-profit organizations and other developers. Much of this initiative is driven by the Project-Based Voucher Program, which facilitates the development of new housing projects. However, SCCHA's efforts extend beyond mere housing solutions; they also address essential barriers that families face, such as access to basic household items, employment opportunities, and training programs. By creating these collaborative partnerships, SCCHA is not only providing immediate assistance but also paving the way for families to achieve long-term self-sufficiency and stability.

SCCHA partnered with Southern Illinois Healthcare Foundation (SIHF) [through affiliated entities] to secure IHDA (Illinois Housing Development Authority) funding sixteen (16) one-bedroom new construction Permanently Supportive Housing (PSH) units in Cahokia Heights. The development is now open, and two (2) units are currently vacant. Phase II of Vivian's Village has financial closing is complete and work will begin for the thirty-six family (general occupancy) units as a second phase to the Vivian's Village development. The partnership secured tax credit financing through IHDA. The construction of this size is the first new construction residential development in the community for more than thirty (30) years. Two (units) received HOME subsidy funds.

SCCHA has successfully finalized a real estate transaction involving 44 rental units located in the O'Fallon and Lebanon, Illinois, with a total investment of \$2.2 million under the Rental Assistance Demonstration (RAD) program. This initiative plays a vital role in the enhancement of

public housing, aiming to improve living standards and ensure that affordable housing options remain available for those who require them. By participating in the RAD program, SCCHA is empowered to protect the rights and welfare of its residents while simultaneously revitalizing the community through significant modernization and rehabilitation efforts on the properties. This endeavor underscores SCCHA's dedication to enhancing housing conditions in St. Clair County, reflecting a commitment to fostering a better living environment for all residents.

SCCHA is committed to enhancing the quality of its public housing stock through various initiatives, through the Capital Fund Program, which includes routine and preventive maintenance, and improved management practices. Currently, SCCHA is undertaking a comprehensive physical needs assessment for all its properties, a process that occurs every five years to ensure that the housing meets the necessary standards and requirements. In addition, SCCHA is evaluating the potential for "repositioning" its public housing inventory, a strategy encouraged by HUD. This approach may involve transitioning properties to Section 8 programs, such as the Rental Assistance Demonstration (RAD) with project-based vouchers (PBV) or project-based rental assistance (PBRA). The goal is to address the challenges posed by aging public housing that requires capital improvements exceeding the funding available from HUD. SCCHA anticipates that the repositioning may encompass a range of actions, including demolition, RAD-PBV, PBRA, and various renovation or redevelopment projects aimed at revitalizing the housing stock.

In parallel, SCCHA is collaborating with Ameren to conduct energy efficiency audits that will pinpoint areas of energy waste and recommend improvements. This proactive approach aims to help tenants reduce their utility expenses, thereby easing their household budgets. During the audits, inspectors will assess critical components of the buildings, such as insulation, air leaks, and essential systems like HVAC and appliances, utilizing advanced diagnostic tools like blower doors and infrared cameras. The outcome of these audits will be a detailed report outlining recommendations for enhancing energy efficiency and lowering costs. These suggestions may range from simple, cost-effective solutions like weatherstripping to more significant investments, such as replacing windows or upgrading insulation, all designed to create a more sustainable living environment for residents.

SCCHA has allocated project-based vouchers (PBV) to several new developments, including New Broadview, North Bend, and Winstanley Park, to ensure housing accessibility across St. Clair County. Currently, we are unable to issue new vouchers due to a potential shortfall, as directed by HUD, which has instructed our office to halt any new allocations until further notice. Our focus at this time is on providing continued support to the residents and landlords already assigned to the program.

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

SCCHA staff are actively collaborating with residents to promote the establishment of officially elected resident councils and organizations. In

the senior housing complexes of Bel I and II, each floor has appointed a captain who liaises directly with the Property Manager. This partnership aims to identify resident concerns and to facilitate a calendar of social activities designed to foster community engagement among residents. These socialization opportunities are supported by Senior Resources from the local community, ensuring that residents have access to enriching experiences. SCCHA has been instrumental in supporting one active resident council and has previously provided financial assistance, technical support, and other resources to past councils as needed.

SCCHA is actively engaged in establishing resident councils across all development areas, a task that has presented significant challenges. Nevertheless, with the advent of new partnerships, we are optimistic that these obstacles will soon be overcome. Our Family Resource Center, located within Cahokia Heights—our largest public housing development, specifically at Private Mathison Manor—also serves residents from the Ernest Smith and Hawthorne sites. This center is equipped with a computer lab that is accessible to residents three days a week, providing them with essential technological resources. Additionally, it houses a small library stocked with books generously donated by the Belleville Public Library, allowing residents to borrow literature at no cost. These initiatives are strategically designed to improve residents' access to technology and foster literacy, ultimately contributing to their personal development and overall well-being.

Furthermore, two non-profit organizations are situated within the development to address the diverse needs of residents. The Urban League of St. Clair County operates from the Property Management Office, offering the Save Our Brothers and Sisters program, which focuses on job training, computer skills development, financial literacy, entrepreneurship, and homeownership. Meanwhile, the Catholic Urban Program provides structured out-of-school programming for youth aged 6 to 14, assisting them with homework and engaging them in STEM activities through hands-on experiences and field trips. This comprehensive approach not only supports educational growth but also broadens the horizons of young residents, helping them envision a world of possibilities.

SCCHA, the Cahokia School District 189, and the Cahokia Police Department have come together to launch a collaborative initiative focused on tackling the critical issue of truancy within the community. This partnership is intentionally structured to promote regular school attendance among children during official school hours, thereby reducing the likelihood of students gathering within the housing complex, which can sometimes result in conflicts or negative behaviors. With this initiative, the school district has resources to deploy social workers and truancy staff to assist families by providing essential support to help them navigate various obstacles they may face. This holistic approach is designed to ensure that every child has access to the education necessary for their future success, ultimately contributing to a more stable and nurturing environment for both students and their families.

SCCHA has been unable to introduce a homeownership component to its Section 8 Voucher Program due to cuts in administrative fees, which

would have allowed eligible households to use Section 8 assistance for purchasing homes. Nevertheless, it is probable that former public housing residents and Section 8 HCVP participants have taken advantage of the County's Homebuyer Assistance Program to achieve homeownership, although they may not have shared the specifics of their transition from federally assisted housing. Public housing residents, as well as former public housing and Section 8 HCVP recipients, are encouraged to explore the SCC homebuyer program.

**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.

### **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. The County also completes inspections for several units occupied by both homeowners and renters.

### **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 through 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 the Community Development Block Grant (CDBG), HOME Investment Partnership Grant, multiple Illinois Housing Development Authority Grants and HUD Continuum of Care grants in conjunction with the St. Clair County Homeless Action Council. CS administers Community Services Block Grant (CSBG), Low Income Home Energy Assistance Program (LIHEAP), and multiple weatherization grants. 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.

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 Southwestern 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 August 2024 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 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 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 continue to attend meetings with lenders and realtors to provide education on the benefits that our programs 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 substantial portion of its PY 2024 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 2024 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 2024.

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 people 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 recorded mortgage, deed of release, and tax bills.
- 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 on St. Clair County's website. Ads generally feature inclusive language encouraging broad participation. For public facilities, a list of businesses 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 2024 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 2024 CAPER on 9/24/25. Two hearings were held at 10:00 a.m. and at 4:00 p.m. at 19 Public Square, Belleville, IL. On 9/10/25 a notice of the public hearing was placed in the Belleville News Democrat, 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.

A second public hearing was held on 11/10/2025 at 4:00 p.m. at 19 Public Square, Belleville, IL. On 10/26/2025 a notice of the public hearing was placed in the Belleville News Democrat and the hearing was advertised on the County website.

This Program Year 2024 Consolidated Annual Performance Evaluation Report (CAPER) was made available to the public from November 12, 2025 through December 14, 2025. The notice was published in the local paper and on the County website on October 26, 2025. 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.**

As noted, the COVID-19 pandemic impacted the County's priorities and achievements and the 2020-2024 Consolidated Plan was amended to reduce goals that were unable to realistically be met during the remaining years of the five-year Consolidated Plan cycle. Despite our best efforts, the County fell slightly short of meeting the five-year goal for Homebuyer Assistance and HOME acquisition/rehab projects.

**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 2024. 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 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 \$1,010.00 on hand, in PY 2024 \$146,874.44 in HOME program income was received and \$147,824.44 was expended, leaving a balance on hand of \$60.00. \$6,736.00 was spent on housing rehab activities, \$620.00 was spent on homebuyer activities, and \$140,468.44 was spent on CHDO acquisition/rehab activities. The \$60.00 balance on hand was expended, for a homebuyer assistance activity, and will be reflected in next year's CAPER.

**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 2024 the County provided down payment and closing cost assistance to 15 low-moderate income homebuyers, including two homebuyers who purchased CHDO-developed homes. 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 21 low-income households that completed home repairs, 2 loans to make accessibility upgrades, and 3 loans to make emergency 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

<b>Total labor Hours</b>	<b>CDBG</b>	<b>HOME</b>
Total Number of Activities	5	0
Total Labor Hours	3,356	0
Total Section 3 Worker Hours	202	0
Total Targeted Section 3 Worker Hours	<b>202</b>	<b>0</b>

<b>Qualitative Efforts – Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	1	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	1	0
Direct, on-the job training (including apprenticeships).	1	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).	1	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	1	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.	1	0
Held one or more job fairs.	1	0
Provided or connected residents with supportive services that can provide direct services or referrals.	1	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.	1	0
Assisted residents with finding childcare.	1	0
Assisted residents to apply for or attend community college or a four-year educational institution.	1	0
Assisted residents to apply for or attend vocational/technical training.	1	0

Assisted residents to obtain financial literacy training and/or coaching.	1	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.	1	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	1	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.	1	0
Other.	1	0

**Narrative:**

St. Clair County engages in many of the qualitative efforts described above. Currently, IGD has five public facilities contracts that exceed \$200,000, two in the City of Belleville, one in East St. Louis, one in Caseyville Township, and one in the Village of Swansea. 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 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.