

Housing Authority of the City of Olivette  
Board of Commissioners  
Regular Meeting  
Tuesday, August 22, 2023  
12 pm

Olivette City Center  
1140 Dielman Road  
Olivette, Missouri 63132

Agenda Item	Individual	Action
1. Roll Call	Terri Acoff-States	Informational
2. Approval of Minutes Regular Meeting held May 16, 2023	Chairwoman	Motion Second Vote
3. Public Comments	Chairwoman	Informational
4. Presentation of the City of Olivette Housing Authority Draft Audit Report for year ending 2022	Nick Territo Clifton Larson Allen, LLP	Motion Second Vote
5. Mayor's Report	Mayor Weil	Informational
6. Executive Director's Report	Shannon Koenig	Informational
7. Financial Reports for period ending June 30, 2023	Carolyn Riddle	Motion Second Vote
8. Other Business		
A. Housing Authority of the City of Olivette FY 2024 Budget, Resolution No. 1423	Carolyn Riddle	Motion Second Vote
B. 2024 Annual PHA Plan and Certification of Compliance	Emily Smith	Motion Second Vote
C. Agency Performance Report	Anna Holyan	Informational
D. Housing Administration Report	Katrina Sommer	Informational
E. Facilities and Maintenance Report	William Barry	Informational
F. National Standards for the Physical Inspection of Real Estate (NSPIRE)	Emily Smith	Informational
9. Executive Session	Chairwoman	Motion Second Vote
Subject to an affirmative vote of the Board of Commissioners, an Executive Session may be held to discuss personnel issues, real estate, or litigation matters pursuant to RSMo Sections 610.021 to 610.022.		
10. Scheduling Next Meeting December 5, 2023	Chairwoman	Informational
11. Adjournment	Chairwoman	Motion Second Vote

HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
BOARD OF COMMISSIONERS MEETING  
TUESDAY, MAY 16, 2023  
MEETING MINUTES

ROLL CALL:

COMMISSIONERS:

Nikeyia Ingram, Chairwoman  
Ellen Schapiro, Vice Chairwoman  
Stephanie Afful, Commissioner  
Dona Turpin, Commissioner

STAFF:

Shannon Koenig, Executive Director and CEO  
Terri Acoff-States, Executive Assistant  
Mike Chapman, Chief Operating Officer  
Katrina Sommer, Deputy Chief Operating Officer  
William Barry, Director, Maintenance and Facilities  
Carolyn Riddle, Interim Finance Director  
Emily Smith, Director, Program Compliance and Training

GUEST:

Missy Waldman, Mayor Pro Tem  
Darren Mann, Finance Director and Interim City Manager

ABSENT:

Suzanne Antoine, Commissioner

Approval of Minutes of Regular Board Meeting held Tuesday, March 7, 2023.

Chairwoman Nikeyia Ingram asked for a motion to approve the minutes of the regular board meeting held Tuesday, March 7, 2023. Vice Chairwoman Ellen Schapiro motioned for approval. Commissioner Donna Turpin seconded the motion. Upon roll call the "Ayes" and "Nays" were as follows:

AYES

N. Ingram  
E. Schapiro  
D. Turpin

NAYS

None

The Chairwoman declared the motion passed.

PUBLIC COMMENTS:

There were no public comments.

CITY OF OLIVETTE REPORT:

Mayor Pro Tem Waldman greeted everyone and announced Darren Mann as the interim City Manager for the City of Olivette following the retirement of Barbara Sondag in April. She stated they are recruiting to fill the position.

Mayor Pro Tem Waldman thanked the Authority for including Olivette's upcoming comprehensive plan community vision workshop flyer in the board materials. She also said the city parks and community center projects are moving forward.

EXECUTIVE DIRECTOR'S REPORT:

Ms. Koenig welcomed everyone and thanked them for attending the meeting.

Ms. Koenig informed the board that the authority selected Bailey & Co. to lead the agency's rebranding, logo update, and new website development. Bailey & Co. will also assist with media relations on an ad hoc basis.

Ms. Koenig updated the board on Wellston public housing redevelopment, stating that the financing closed on March 17<sup>th</sup>. She also stated the Housing Authority of St. Louis County has been working over the last several years to help redevelop the 201-unit portfolio. The units in Wellston are no longer public housing. Construction will begin soon and will take about two years to complete. The result will be a 186-unit affordable scattered site development in Wellston.

Ms. Koenig informed the board that Authority staff will host an event this fall that will bring together commissioners from all four housing authorities, along with select staff and local elected officials for food, fellowship, and gratitude. The event is tentatively planned for an outdoor afternoon/evening reception. She stated more details will be provided this summer.

FINANCIAL REPORT:

Ms. Riddle reviewed the Financial Reports for period ending March 31, 2023.

After discussion, Chairwoman Nikeya Ingram asked for a motion to approve the Financial Reports for period ending March 31, 2023. Commissioner Ellen Schapiro motioned for approval. Commissioner Stephanie Afful seconded the motion. Upon roll call, "Ayes" and "Nays" were as follows:

AYES

N. Ingram  
E. Schapiro  
S. Afful  
D. Turpin

NAYS

None

The Chairwoman declared the motion passed.

OTHER BUSINESS:

A. Housing Administration Report:

Ms. Sommer reviewed the Housing Administration Report.

B. Facilities and Maintenance Report

Mr. Barry reviewed the monthly maintenance and supply costs for January through March 31, 2023.

C. Admissions and Continued Occupancy Policy (ACOP):

Ms. Smith presented updates to the Admissions and Continued Occupancy Policy (ACOP) as required by the U.S. Department of Housing and Urban Development (HUD) regarding community service requirements and changes to certain provisions of the Housing Opportunity Through Modernization Act of 2016 (HOTMA).

After discussion, Chairwoman Nikeya Ingram motioned to approve the updates to the Admissions and Continued Occupancy Policy (ACOP). Commissioner Donna Turpin seconded the motion for approval and upon roll call the "Ayes" and "Nays" were as follows:

<u>AYES</u>	<u>NAYS</u>
N. Ingram E. Schapiro S. Afful D. Turpin	None

The Chairwoman declared the motion passed.

EXECUTIVE SESSION:

An Executive Session was not held.

NEXT BOARD MEETING:

The next meeting is scheduled for Tuesday, August 22, 2023.

ADJOURNMENT OF MEETING:

There being no further business to come before the board, Chairwoman Nikeya Ingram asked for a motion to adjourn. Commissioner Donna Turpin moved for adjournment, which motion was seconded by Commissioner Stephanie Afful. Upon roll call, "Ayes" and "Nays" were as follows:

<u>AYES</u>	<u>NAYS</u>
N. Ingram E. Schapiro S. Afful D. Turpin	None

The Chairwoman thereupon declared said motion passed.

\_\_\_\_\_  
Chairwoman

\_\_\_\_\_  
Secretary

\_\_\_\_\_  
Date



*We'll get you there.*

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# 2022 Audit Results

Housing Authority of the City of Olivette

Presented to the Board of Commissioners

August 22, 2023

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# Presentation Agenda



- Engagement Team



- Scope



- Responsibilities of Parties Involved



- Audit Timeline



- Financial Statement Summary



- Required Governance Communication



- Questions



# CLA Engagement Team



Gaby Miller, Signing Director



Nick Territo, Senior



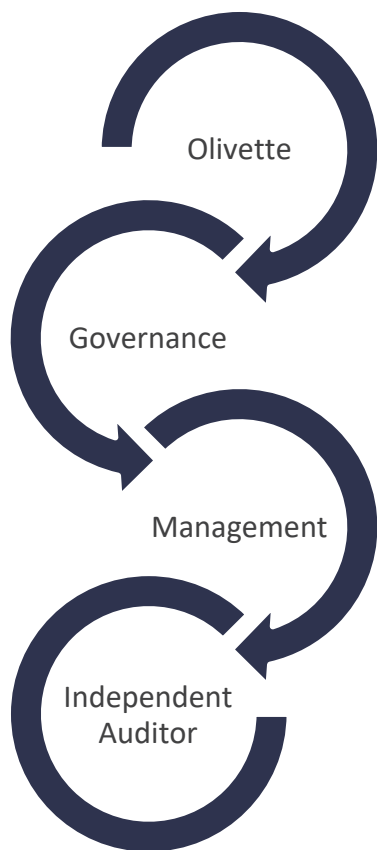
# Engagement Scope

- Independent Auditors' Report – Auditors' Opinion on Financial Statements
- Required Supplementary Information - Management's Discussion and Analysis
- Other Supplementary Information – Financial Data Schedules





# Responsibilities of Parties Involved

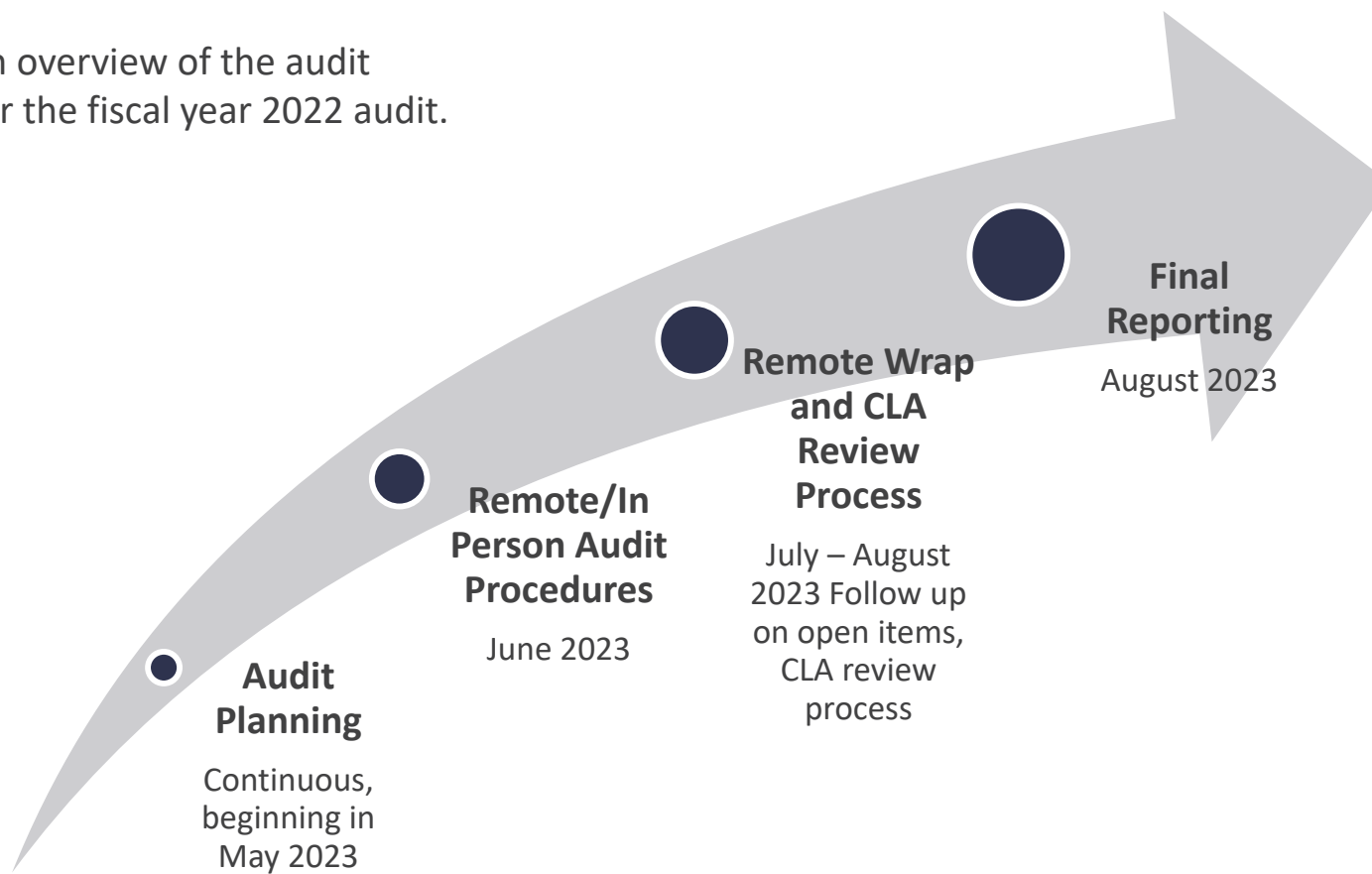


<b>Governance</b>	Strategic Direction
	Accountability, including financial reporting
<b>Management</b>	Internal Controls
	Accounting Policies
	Management Decisions
	Fair Presentation of Financial Statements
	Programs to Prevent and Detect Fraud
<b>Independent Auditor</b>	Opinion on Fair Presentation of Financial Statements
	Audit in Accordance with GAAS and <i>Government Auditing Standards</i>
	Reasonable, not Absolute Assurance
	Understanding of Internal Controls
	Risk Based Audit Approach



# Audit Timeline

Below is an overview of the audit timeline for the fiscal year 2022 audit.



# Financial Statements

- Auditors' report
- Required Supplementary Information
  - Management's discussion and analysis
- Financial statements and footnotes
- Other Supplementary information
  - Financial Data Schedules



# STATEMENTS OF NET POSITION

	2022	2021	\$ Change
Assets			
Current assets	\$ 233,070	\$ 219,672	\$ 13,398
Capital assets, net	<u>10,574</u>	<u>11,973</u>	<u>(1,399)</u>
Total Assets	<u>\$ 243,644</u>	<u>\$ 231,645</u>	<u>\$ 11,999</u>
Liabilities			
Current liabilities	\$ 23,097	\$ 23,723	\$ (626)
Noncurrent liabilities	<u>65</u>	<u>479</u>	<u>(414)</u>
Total liabilities	<u>\$ 23,162</u>	<u>\$ 24,202</u>	<u>\$ (1,040)</u>
Net Position			
Net investment in capital assets	10,574	11,973	(1,399)
Unrestricted	<u>209,908</u>	<u>195,470</u>	<u>14,438</u>
Total net position	<u>\$ 220,482</u>	<u>\$ 207,443</u>	<u>\$ 13,039</u>

- **Total assets** at December 31, 2022 were \$243,644. This represents an increase of \$11,999 from the previous year amount of \$231,645.
- **Net capital assets** decreased from \$11,973 at December 31, 2021 to \$10,574 at December 31, 2022. This decrease is the result of annual depreciation expense in 2022.
- **Current liabilities** decreased from \$23,723 at December 31, 2021 to \$23,097 at December 31, 2022. The current liabilities are made of trade payables, payments in lieu of taxes due at year-end and security deposits. Trade payments and payments made in lieu of taxes due remained consistent year over year.



# STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET POSITION

	2022	2021	\$ Change
Operating Revenue			
Tenant Revenue - Rents and Other	\$ 63,382	\$ 63,586	\$ (204)
HUD Operating Subsidies	44,229	62,349	(18,120)
Other Income	7,388	3,884	3,504
Total operating revenue	<u>114,999</u>	<u>129,819</u>	<u>(14,820)</u>
Operating Expenses			
Administrative	29,115	24,837	4,278
Tenant Services	-	9	(9)
Utilities	10,519	9,622	897
Maintenance and Operations	46,136	43,210	2,926
Protective Services	233	177	56
General Expenses	14,586	17,167	(2,581)
Total operating expense	<u>100,589</u>	<u>95,022</u>	<u>5,567</u>
Operating income (loss) before depreciation	<u>14,410</u>	<u>34,797</u>	<u>(20,387)</u>
Depreciation	1,399	227	1,172
Operating Income	13,011	34,570	(21,559)
Nonoperating Revenues (Expenses)			
Investment income	28	11	17
Total nonoperating revenues (expenses)	<u>28</u>	<u>11</u>	<u>17</u>
Change in net position	13,039	34,581	(21,542)
Net position, beginning of year, as restated	<u>207,443</u>	<u>172,862</u>	<u>34,581</u>
Net position, end of year	<u>\$ 220,482</u>	<u>\$ 207,443</u>	<u>\$ 13,039</u>

- **Operating revenue** decreased by \$14,820 from \$129,819 in 2021 to \$114,999 in 2022. This decrease is mostly due to a decrease in capital fund grants of \$18,120.

- **Operating expense** increased by \$6,739 from \$95,249 in 2021 to \$101,988 in 2022. This was mainly due to the increase in administrative expenses, utilities, depreciation expense, and maintenance and operations expenses of \$9,726.



# Auditor Communication

- Auditors' responsibility under generally accepted audit standards.
- No changes from planned scope

- We evaluated management's estimates and are comfortable with them
- Significant estimates: Allowance for doubtful accounts and depreciation

- Neutral, consistent, and clear

- No significant difficulties.
- No disagreements with management
- No management consultations with other accounting firms

- No Audit Adjustments
- No identified Uncorrected Misstatements
- Management representations forthcoming



# Audit Findings

- **Capitalization Threshold** – \$5,000 threshold to ensure compliance with Uniform Guidance
- **Pooled Cash** – Municipalities and HASLC cash balances in separate bank accounts



# Questions?





Special thanks to Housing  
Authority of St. Louis  
County's finance and  
program staff during the  
2022 audit!



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**HOUSING AUTHORITY OF THE CITY OF OLIVETTE**

**FINANCIAL STATEMENTS AND  
SUPPLEMENTARY INFORMATION**

**YEARS ENDED DECEMBER 31, 2022 AND 2021**

DRAFT 8.9.23

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
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DRAFT 8.9.23

## INDEPENDENT AUDITORS' REPORT

Board of Commissioners  
Housing Authority of the City of Olivette  
St. Louis County, Missouri

### **Report on the Audit of the Financial Statements**

#### ***Opinions***

We have audited the accompanying financial statements of the Housing Authority of the City of Olivette (the Authority), as of and for the years ended December 31, 2022 and 2021, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Authority, as of December 31, 2022 and 2021, and the changes in its financial position, and cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

#### ***Basis for Opinions***

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

#### ***Responsibilities of Management for the Financial Statements***

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for 12 months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

***Auditors' Responsibilities for the Audit of the Financial Statements***

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

***Required Supplementary Information***

Accounting principles generally accepted in the United States of America require that the Management's Discussion and Analysis as listed in the table of contents be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with GAAS, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

***Supplementary Information***

Our audits were conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Authority's basic financial statements. The accompanying financial data schedules, as required by the Department of Housing and Urban Development (HUD), are presented for purposes of additional analysis and are not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the accompanying financial data schedules are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

**CliftonLarsonAllen LLP**

St. Louis, Missouri  
REPORT DATE

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
MANAGEMENT'S DISCUSSION AND ANALYSIS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

Housing Authority of the City of Olivette's (the Authority) Management Discussion and Analysis is designed to (a) assist the reader in focusing on significant financial issues, (b) provide an overview of the Authority's financial activity, (c) identify changes in the Authority's financial position and (d) identify individual fund issues or concerns.

Since the Management's Discussion and Analysis (MD&A) is designed to focus on the current year's activities, resulting changes and currently known facts, it should be read in conjunction with the Authority's financial statements.

**Financial Highlights**

- The assets of the Authority exceeded liabilities as of December 31, 2022 by \$220,482 (net position). This represents an increase of \$13,039 from the 2021 balance of \$207,443.
- The Authority's cash balance as of December 31, 2022 was \$220,636, representing an increase of \$10,666 from the prior year.
- The Authority had total operating revenues of \$114,999 as well as \$28 of investment income, totaling \$115,027 in revenue. Total operating expenses were \$101,988 for the fiscal year ended December 31, 2022.
- The Authority's expenditure of Federal awards amounted to \$44,229 for fiscal year 2022.

**Overview of the Financial Statements**

The financial statements are designed to provide readers with a broad overview of the Authority's finances, in a manner similar to a private-sector business. The reports were prepared in accordance with U.S. GAAP applicable to governmental entities for proprietary-type funds.

The Authority is considered an enterprise fund. Enterprise funds utilize the full accrual basis of accounting. Accrual accounting recognizes revenues and expenses when earned regardless of when cash is received or paid.

These statements include a Statement of Net Position, which is similar to a Balance Sheet. The Statement of Net Position reports all financial and capital resources for the Authority. The statement is presented in the format where assets and deferred outflows of resources minus liabilities and deferred inflows of resources equal net position, formerly known as net assets. Assets and liabilities are presented in order of liquidity, and are classified as current (convertible into cash within one year), and noncurrent.

The focus of the Statement of Net Position (the Unrestricted Net Position) is designed to represent the net available liquid (noncapital) assets, net of liabilities, for the entire Authority. This information will help provide the reader an idea of the overall health of the Authority as it tells you how much funds are actually in reserve to operate the Authority. Net position is reported in three broad categories:

*Investment in Capital Assets:* This component of net position consists of all capital assets, reduced by the outstanding balances of any bonds, mortgages, notes, or other borrowings that are attributable to the acquisition, construction, or improvement of those assets. The Authority does not have debt related to its capital assets.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
MANAGEMENT'S DISCUSSION AND ANALYSIS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

**Overview of the Financial Statements (Continued)**

*Restricted Net Position:* This component of net position reports the difference between assets and liabilities with constraints that are placed on their use by either external parties or enabling legislation, including by creditors (such as debt covenants), grantors, contributors, laws, regulations, etc.

*Unrestricted Net Position:* Consists of net position that does not meet the definition of "investment in capital assets" or "restricted net position."

The Authority-wide financial statements also include a Statement of Revenues, Expenses, and Changes in Net Position, (similar to an income statement). This statement includes operating revenues, such as rental income, operating expenses, such as administrative, utilities, maintenance, and depreciation, and nonoperating revenue and expenses, such as capital grant revenue, investment income and interest expense.

The financial statements for the Authority encompass the Conventional Public Housing Program. Under the Conventional Public Housing Program, the Authority rents units that it owns (14) to low-income households. The Conventional Public Housing Program is operated under an Annual Contributions Contract (ACC) with HUD, and HUD provides Operating Subsidy and Capital Grant funding to enable the Authority to provide the housing at a rent that is based upon 30% of household income. The Conventional Public Housing Program includes the Capital Fund Program (CFP), which is the primary funding source for physical and management improvements to the Authority's properties.

**AUTHORITY-WIDE FINANCIAL STATEMENTS**

**Statement of Net Position**

The following table reflects the condensed Statement of Net Position compared to prior years. The Authority is engaged only in business-type activities.

	2022	2021	2020	\$ Change 2022/2021	% Change 2022/2021
<b>Assets</b>					
Cash - Unrestricted and Restricted	\$ 220,636	\$ 209,970	\$ 170,216	\$ 10,666	5.08%
Other Current Assets	12,434	9,702	2,803	2,732	28.16%
Capital Assets, Net	10,574	11,973	12,200	(1,399)	-11.68%
<b>Total Assets</b>	<b>243,644</b>	<b>231,645</b>	<b>185,219</b>	<b>11,999</b>	<b>5.18%</b>
<b>Liabilities</b>					
Current Liabilities	23,097	23,723	11,958	(626)	(2.64)%
Noncurrent Liabilities	65	479	399	(414)	-86.43%
<b>Total Liabilities</b>	<b>23,162</b>	<b>24,202</b>	<b>12,357</b>	<b>(1,040)</b>	<b>-4.30%</b>
<b>Net Position</b>					
Investment in Capital Assets	10,574	11,973	12,200	(1,399)	(11.68)%
Unrestricted	209,908	195,470	160,662	14,438	7.39%
<b>Total Net Position</b>	<b>\$ 220,482</b>	<b>\$ 207,443</b>	<b>\$ 172,862</b>	<b>\$ 13,039</b>	<b>6.29%</b>



**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
MANAGEMENT'S DISCUSSION AND ANALYSIS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

**AUTHORITY-WIDE FINANCIAL STATEMENTS (CONTINUED)**

**Analysis of Entity Wide Net Position (Statement of Net Position) for the years ended December 31, 2022 and 2021:**

**Total assets** at December 31, 2022 were \$243,644. This represents an increase of \$11,999 from the previous year amount of \$231,645.

**Net capital assets** decreased from \$11,973 at December 31, 2021 to \$10,574 at December 31, 2022. This decrease is the result of annual depreciation expense in 2022.

**Current liabilities** decreased from \$23,723 at December 31, 2021 to \$23,097 at December 31, 2022. The current liabilities are made of trade payables, payments in lieu of taxes due at year-end and security deposits. Trade payments and payments made in lieu of taxes due remained consistent year over year.

**Analysis of Entity Wide Net Position (Statement of Net Position) for the years ended December 31, 2021 and 2020:**

**Total assets** at December 31, 2021 were \$231,645. This represents an increase of \$46,246 from the previous year amount of \$185,219.

**Net capital assets** decreased from \$12,200 at December 31, 2020 to \$11,973 at December 31, 2021. This decrease is the result of annual depreciation expense in 2021.

**Current liabilities** increased from \$11,958 at December 31, 2020 to \$23,903 at December 31, 2021. The current liabilities are made of trade payables, payments in lieu of taxes due at year-end and security deposits. The increase year over year mainly represents an increase in trade payables and payments in lieu of taxes due to timing.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
MANAGEMENT'S DISCUSSION AND ANALYSIS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

**AUTHORITY-WIDE FINANCIAL STATEMENTS (CONTINUED)**

**Statement of Revenues, Expenses, and Changes in Net Position**

The following schedule compares the revenues and expenses for the current and previous fiscal year.

	2022	2021	2020	\$ Change 2022/2021	% Change 2022/2021
<b>Operating Revenues</b>					
Tenant Revenue - Rents and Other	\$ 63,382	\$ 63,586	\$ 59,262	\$ (204)	(0.32)%
HUD PHA Operating Grants	44,229	62,349	113,589	(18,120)	(29.06)%
Other Income	7,388	3,884	300	3,504	0.00%
Total Operating Revenues	<u>114,999</u>	<u>129,819</u>	<u>173,151</u>	<u>(14,820)</u>	<u>(11.42)%</u>
<b>Operating Expenses</b>					
Administrative	29,115	24,837	27,588	4,278	17.22%
Tenant Services	-	9	306	(9)	(100.00)%
Utilities	10,519	9,622	9,193	897	9.32%
Maintenance and Operations	46,136	43,210	84,583	2,926	6.77%
Protective Services	233	177	191	56	31.64%
General	14,586	17,167	20,392	(2,581)	(15.03)%
Depreciation	1,399	227	8,423	1,172	516.30%
Total Operating Expenses	<u>101,988</u>	<u>95,249</u>	<u>150,676</u>	<u>6,739</u>	<u>7.08%</u>
Operating Income	13,011	34,570	22,475	(21,559)	62.36%
<b>Nonoperating Revenues (Expenses)</b>					
Investment Income	28	11	7	17	154.55%
Total Nonoperating Revenues (Expenses)	<u>28</u>	<u>11</u>	<u>7</u>	<u>17</u>	<u>(154.55)%</u>
Change in Net Position	13,039	34,581	22,482	(21,542)	62.29%
Net Position - Beginning of Year	<u>207,443</u>	<u>172,862</u>	<u>150,380</u>	<u>34,581</u>	<u>20.00%</u>
<b>Net Position - End of Year</b>	<u>\$ 220,482</u>	<u>\$ 207,443</u>	<u>\$ 172,862</u>	<u>\$ 13,039</u>	<u>6.29%</u>

**Analysis of Entity Wide Statement of Revenues, Expenses, and Changes in Net Position for the years ended December 31, 2022 and 2021:**

**Operating revenue** decreased by \$14,820 from \$129,819 in 2021 to \$114,999 in 2022. This decrease is mostly due to a decrease in capital fund grants of \$18,120.

**Operating expense** increased by \$6,739 from \$95,249 in 2021 to \$101,988 in 2022. This was mainly due to the increase in administrative expenses, utilities, depreciation expense, and maintenance and operations expenses of \$9,726.

**Operating income** in 2022 was \$13,011. This was a decrease of \$21,559 from 2021 operating income of \$34,570 primarily due to a decrease in capital grant funds.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
MANAGEMENT'S DISCUSSION AND ANALYSIS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

**AUTHORITY-WIDE FINANCIAL STATEMENTS (CONTINUED)**

**Analysis of Entity Wide Statement of Revenues, Expenses, and Changes in Net Position for the years ended December 31, 2021 and 2020:**

**Operating revenue** decreased by \$43,332 from \$173,158 in 2020 to \$129,830 in 2021. This decrease is mostly due to a decrease in capital fund grants of \$51,240.

**Operating expense** decreased by \$55,427 from \$150,676 in 2020 to \$95,249 in 2021. This was mainly due to the decrease in maintenance and operations expenses of \$41,373.

**Operating income** in 2021 was \$34,570. This was an increase of \$12,066 from 2020 operating income of \$22,475 primarily due to decreased maintenance and operating expenses.

**Capital Assets and Debt Administration**

**Capital Assets**

As of December 31, 2022, the Authority had \$10,574 invested in a variety of capital assets as follows:

**Capital Assets at Year-End**

	2022	2021	Total Change	Percent Change
Land	\$ 8,400	\$ 8,400	-	0%
Buildings	561,950	561,950	-	0%
Furniture and Equipment	16,129	16,129	-	0%
Leasehold Improvements	45,254	45,254	-	0%
Total	631,733	631,733	-	0%
Accumulated Depreciation	(621,159)	(619,760)	(1,399)	0%
Total Capital Assets	<u>\$ 10,574</u>	<u>\$ 11,973</u>	<u>\$ (1,399)</u>	<u>-12%</u>

The following reconciliation summarizes the change in capital assets.

**Change in Capital Assets**

	2022	2021
Beginning Balance - January 1	\$ 11,973	\$ 12,200
Annual Depreciation	(1,399)	(227)
Ending Balance - December 31	<u>\$ 10,574</u>	<u>\$ 11,973</u>

In 2022, the Authority did not have any capital asset additions or disposals. The amount of depreciation for the period was \$1,399.

Additional information on capital assets can be found in Note 4 to the financial statements.

**Debt Administration**

As of December 31, 2022 and 2021, the Authority did not have any outstanding long-term debt.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
MANAGEMENT'S DISCUSSION AND ANALYSIS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

**AUTHORITY-WIDE FINANCIAL STATEMENTS (CONTINUED)**

**Economic Factors**

Significant economic factors affecting the Authority are as follows:

- Federal funding provide by Congress to the Department of Housing and Urban Development
- Local labor supply and demand, which can affect salary and wage rates
- Local inflationary, recessionary and employment trends, which can affect resident incomes and therefore the amount of rental income
- Inflationary pressure on utility rates, supplies and other costs

**FINANCIAL CONTACT**

The individual to be contacted regarding this report is Shannon Koenig, Executive Director of the Housing Authority of St. Louis County at (314) 227-3114. Specific requests may be submitted to the Housing Authority of St. Louis County at 8865 Natural Bridge, St. Louis, MO 63121.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
STATEMENTS OF NET POSITION  
DECEMBER 31, 2022 AND 2021**

	2022	2021
<b>CURRENT ASSETS</b>		
Cash - Unrestricted	\$ 206,128	\$ 195,463
Cash - Restricted	14,508	14,507
Prepaid Expenses	9,842	7,498
Accounts Receivable, Net of Allowance of \$11,727 and \$17,666, Respectively	2,592	2,204
Total Current Assets	233,070	219,672
<b>NONCURRENT ASSETS</b>		
Capital Assets being Depreciated, Net	2,174	3,573
Nondepreciable Capital Assets	8,400	8,400
Total Noncurrent Assets	10,574	11,973
Total Assets	243,644	231,645
<b>CURRENT LIABILITIES</b>		
Accounts Payable	11,678	12,552
Due to Other Governments	5,258	5,389
Accrued Liabilities	676	677
Unearned Revenue	1,090	710
Tenant Security Deposits	4,395	4,395
Total Current Liabilities	23,097	23,723
<b>NONCURRENT LIABILITIES</b>		
Non - Current Liabilities - Other	-	349
Accrued Compensated Absences, Less Current Portion	65	130
Total Noncurrent Liabilities	65	479
Total Liabilities	23,162	24,202
<b>NET POSITION</b>		
Investment in Capital Assets	10,574	11,973
Unrestricted Net Position	209,908	195,470
Total Net Position	\$ 220,482	\$ 207,443

See accompanying Notes to Financial Statements.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
STATEMENTS OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

	2022	2021
<b>OPERATING REVENUES</b>		
Tenant Revenue	\$ 63,382	\$ 63,586
HUD PHA Operating Grants	44,229	62,349
Other Income	7,388	3,884
Total Operating Revenues	114,999	129,819
<b>OPERATING EXPENSES</b>		
Administrative	29,115	24,837
Tenant Services	-	9
Utilities	10,519	9,622
Maintenance and Operations	46,136	43,210
Protective Services	233	177
General Expense	14,586	17,167
Depreciation	1,399	227
Total Operating Expenses	101,988	95,249
<b>OPERATING INCOME</b>	13,011	34,570
<b>NONOPERATING REVENUES (EXPENSES)</b>		
Investment Income - Unrestricted	28	11
<b>CHANGE IN NET POSITION</b>	13,039	34,581
Net Position - Beginning of Year	207,443	172,862
<b>NET POSITION - END OF YEAR</b>	\$ 220,482	\$ 207,443

See accompanying Notes to Financial Statements.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
STATEMENTS OF CASH FLOWS  
YEARS ENDED DECEMBER 31, 2022 AND 2021**

	2022	2021
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>		
Received from Tenants	\$ 63,374	\$ 65,845
Received from Grants	44,229	62,349
Cash Received from Other Sources	7,388	3,884
Paid to Employees for Services	(8,650)	(5,418)
Paid to Suppliers for Goods and Services	(95,703)	(86,917)
Net Cash Provided by Operating Activities	10,638	39,743
 <b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
Interest Received	28	11
Net Cash Provided by Investing Activities	28	11
 <b>NET INCREASE IN CASH, CASH EQUIVALENTS, AND RESTRICTED CASH</b>	10,666	39,754
 Cash, Cash Equivalents, and Restricted Cash - Beginning of Year	209,970	170,216
 <b>CASH, CASH EQUIVALENTS, AND RESTRICTED CASH - END OF YEAR</b>	\$ 220,636	\$ 209,970
 <b>RECONCILIATION OF OPERATING INCOME TO NET CASH PROVIDED BY OPERATING ACTIVITIES</b>		
Operating Income	\$ 13,011	\$ 34,570
Adjustment to Reconcile Operating Income to Net Cash Provided by Operating Activities:		
Depreciation	1,399	227
Bad Debt	866	4,560
Effects of Changes in Operating Assets and Liabilities:		
Accounts Receivable	(1,254)	(4,013)
Prepaid Expenses	(2,344)	(7,446)
Accounts Payable and Accrued Liabilities	(1,420)	10,133
Unearned Revenue	380	1,712
Net Cash Provided by Operating Activities	\$ 10,638	\$ 39,743

See accompanying Notes to Financial Statements.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2022 AND 2021**

**NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

**Reporting Entity**

The Housing Authority of the City of Olivette (the Authority) is a public body organized and authorized in accordance with the laws of the state of Missouri to engage in the development, acquisition, leasing, and administration of a Low-Rent Housing Program under the United States Housing Act of 1937, as amended, administered by the Department of Housing and Urban Development (HUD). The Authority's financial statements include the activities of the Authority, as well as those entities determined to be component units. The criteria used in determining the scope of the entity for financial reporting purposes primarily includes the extent to which the Authority's appointed officials exercise financial accountability for potential component units. To be considered financially accountable, the organization must be fiscally dependent on the Authority and the Authority must either 1) be able to impose its will on the organization or 2) the relationship must have the potential for creating a financial benefit or imposing a financial burden on the Authority. Based on the foregoing, the Authority's financial statements do not include any organizations, which are considered component units. The Authority is managed and administered by The Housing Authority of St. Louis County (HASLC). The Authority does not meet the definition of a component unit of HASLC.

**Basis of Presentation**

The financial statements of the Authority have been prepared in conformity with accounting principles generally accepted in the United States of America (U.S. GAAP) as applied to government units. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing state and local governmental accounting and financial reporting principles. The more significant of the Authority's accounting policies are described below.

**Basis of Accounting and Measurement Focus**

All activities of the Authority are accounted for within a single proprietary (enterprise) fund. An enterprise fund is used to account for operations that are financed and operated in a manner similar to private business enterprises – where the intent of the governing body is that the costs (including depreciation) of providing housing to the general public on a continuing basis be financed or recovered primarily through tenant charges and HUD subsidies.

The Authority's financial statements are presented on the accrual basis of accounting, where revenues are recognized as earned and expenses are recognized when the related liability is incurred. The accounting and financial reporting treatment applied to the Authority is determined by its measurement focus. The transactions of the Authority are accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and all liabilities associated with the operations are included on the statement of net position.

Intergovernmental revenues, representing grants and assistance received from other governmental units, are generally recognized as revenues in the period when all eligibility requirements, as defined by GASB 33, have been met. Any resources received before eligibility requirements are met are reported as unearned revenues. The Authority does not have any derived tax revenues or imposed nonexchange transactions.



**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2022 AND 2021**

**NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)**

**Basis of Accounting and Measurement Focus (Continued)**

The Authority distinguishes operating revenues and expenses from nonoperating items. Operating revenues and expenses generally result from providing services in connection with a proprietary fund's principal ongoing operations. The principal operating revenues of the Authority are HUD PHA grants and tenant revenues. Transactions, which are capital, financing, or investing related, are reported as nonoperating revenues. All expenses related to operating the Authority are reported as operating expenses. Interest expense, financing costs, and miscellaneous expenses are reported as nonoperating expenses. When both restricted and unrestricted resources are available for use, it is the Authority's policy to use restricted resources first, then unrestricted resources as they are needed.

**Cash, Cash Equivalents, and Restricted Cash**

Cash consists of available funds on deposit at a financial institution. The Authority considers all highly liquid investments that are immediately available to the Authority to be cash equivalents. Restricted cash consists of tenant security deposits held by the Authority at the end of the year.

**Capital Assets**

Capital assets, which include buildings, leasehold improvements, equipment, and furniture and fixtures, are stated at cost. Donated capital assets are recorded at estimated acquisition value at the date of donation. Capital assets are defined by the Authority as assets with an estimated useful life in excess of one year with an initial, individual cost greater than .5% of revenue. The Authority tracks assets over \$500 and all electronics and furniture. Upon retirement or disposition of capital assets, the cost and accumulated depreciation are removed from the respective accounts and the resulting gain or loss, if any, is included in operations.

Costs incurred related to capital assets that substantially increase the useful lives of existing buildings and equipment are capitalized at cost. Costs incurred for maintenance, repairs, and minor renewals are charged to operations as incurred.

Depreciation is recorded using the straight-line method over the estimated useful lives of the various classes of assets as follows:

Buildings	20 to 40 Years
Leasehold Improvements	10 to 40 Years
Furniture and Fixtures	5 to 10 Years
Equipment	3 to 10 Years

Land and permanent improvements to land are not depreciated.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2022 AND 2021**

**NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)**

**Net Position**

Net position is classified as follows:

Investment in Capital Assets – This component of net position reports the capital assets, net of accumulated depreciation. The Authority does not have debt related to its capital assets.

Unrestricted – This consists of components of net position that do not meet the definition of “investment in capital assets.”

**Estimates and Assumptions**

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenditures during the reporting period. Actual results could differ from those estimates.

**Accounts Receivable**

Total tenant accounts receivable, net of allowance of uncollectible accounts at December 31, 2022 and 2021 are \$2,592 and \$2,204, respectively.

**NOTE 2 INCOME TAXES**

The Authority is not subject to federal income taxation under the Internal Revenue Code.

**NOTE 3 CASH AND INVESTMENTS**

The Authority had no investments as of December 31, 2022 and 2021. The Authority does not have a formal investment policy. The Authority’s investment activity is conducted in accordance with the following guidance from HUD:

**General**

Funds available for investment include monies that exceed the Authority’s estimated operating cash requirements for a period of 90 days. HUD guidelines permit the Authority to invest in direct obligations of the federal government, federal government agencies, demand and savings deposits, money-market deposit accounts, municipal depository funds, super NOW accounts, collateralized certificates of deposit, collateralized repurchase agreements, and United States Treasury STRIPs. The objectives of HUD’s guidelines for the Authority are as follows:

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2022 AND 2021**

**NOTE 3 CASH AND INVESTMENTS (CONTINUED)**

**General (Continued)**

Safety – Safety is achieved through adherence to the list of permitted investments coupled with an appropriate maturity date.

Liquidity – All investments must be capable of being liquidated on one day's notice. Therefore, no investments may be made that impose a longer notice period for redemption or that are not readily marketable.

Yield – The Authority strives to achieve the highest yield possible while adhering to the other investment objectives of the HUD guidelines. Tax-exempt securities are not appropriate for investment by the Authority because it would not benefit from the tax advantage.

**Investment Type and Maturities**

HUD guidance indicates that investments should be scheduled to mature when the funds are needed. Sale of securities prior to maturity should be avoided due to the inherent risk.

Investments shall be limited to securities maturing in periods of up to one year, or such lesser period that coincides with expected disbursements by the Authority, but not beyond the current financing cycle. The Authority may invest in securities up to three years for the investment of operating reserves.

**Credit Risk**

Guidance from HUD does not address credit quality standards for investments of the Authority.

**Concentration of Credit Risk**

HUD guidance places no limit on the amount the Authority may invest in any one issuer with respect to U.S. treasury securities and collateralized time and demand deposits. The Authority shall limit the amount of funds invested in municipal depository funds to no more than 30% of the Authority's available investment funds.

**Interest Rate Risk**

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. Investments held for longer periods are subject to increased risk of adverse interest rate changes.

**Custodial Credit Risk**

For investments, custodial credit risk is the risk that in the event of the failure of the counterparty to a transaction, the Authority will not be able to recover the value of the investments or collateral securities that are in the possession of an outside party. Guidance provided by HUD does not specifically address custodial credit risk.

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2022 AND 2021**

**NOTE 3 CASH AND INVESTMENTS (CONTINUED)**

**Custodial Credit Risk (Continued)**

For deposits, custodial credit risk is the risk that in the event of financial institution failure, the Authority's deposits may not be returned to it. Protection of the Authority's deposits is provided by the Federal Deposit Insurance Corporation (FDIC), by eligible securities pledged by the financial institution or by a single collateral pool established by the financial institution. At December 31, 2022 and 2021, the Authority's bank balances were entirely insured.

**Restricted Cash**

The Authority must maintain a restricted deposit account for tenant security deposits. Total restricted cash as of December 31, 2022 and 2021 was \$4,395.

**NOTE 4 CAPITAL ASSETS**

The following is a summary of changes in capital assets for the year ended December 31, 2022:

	Balance January 1, 2022	Increases	Decreases	Balance December 31, 2022
Capital Assets Not Being Depreciated:				
Land	\$ 8,400	\$ -	\$ -	\$ 8,400
Capital Assets Being Depreciated:				
Buildings	561,950	-	-	561,950
Furniture and Equipment, Dwellings	16,129	-	-	16,129
Leasehold Improvements	45,254	-	-	45,254
Total Capital Assets Being Depreciated	623,333	-	-	623,333
Less: Accumulated Depreciation	(619,760)	(1,399)	-	(621,159)
Total Capital Assets Being Depreciated, Net	3,573	(1,399)	-	2,174
Capital Assets, Net	<u>\$ 11,973</u>	<u>\$ (1,399)</u>	<u>\$ -</u>	<u>\$ 10,574</u>

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2022 AND 2021**

**NOTE 4 CAPITAL ASSETS (CONTINUED)**

The following is a summary of changes in capital assets for the year ended December 31, 2021:

	Balance January 1, 2021	Increases	Decreases	Balance December 31, 2021
Capital Assets Not Being Depreciated:				
Land	\$ 8,400	\$ -	\$ -	\$ 8,400
Capital Assets Being Depreciated:				
Buildings	561,950	-	-	561,950
Furniture and Equipment, Dwellings	16,129	-	-	16,129
Leasehold Improvements	45,254	-	-	45,254
Total Capital Assets Being Depreciated	623,333	-	-	623,333
Less: Accumulated Depreciation	(619,533)	(227)	-	(619,760)
Total Capital Assets Being Depreciated, Net	3,800	(227)	-	3,573
Capital Assets, Net	<u>\$ 12,200</u>	<u>\$ (227)</u>	<u>\$ -</u>	<u>\$ 11,973</u>

**NOTE 5 COMMITMENTS**

At December 31, 2022, the Authority had the following pending construction projects in progress:

Job	Grant	Funds Approved	Funds Expended Year to Date	Funds Expended Project to Date
CFP 19	MO36P132501-19	27,555	-	19,912
CFP 20	MO36P132501-20	28,617	-	-
CFP 21	MO36P132501-21	27,757	-	-
CFP 22	MO36P132501-22	-	-	-
		<u>83,929</u>	<u>-</u>	<u>19,912</u>

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
FINANCIAL DATA SCHEDULES  
DECEMBER 31, 2022**

Line Item #	Accounts Description	Project Total
<b>ASSETS</b>		
<b>CURRENT ASSETS</b>		
Cash:		
111	Unrestricted	\$ 206,128
113	Cash - Restricted	10,113
114	Tenant Security Deposits	4,395
	Total Cash	<u>220,636</u>
Accounts and Notes Receivable:		
126	Accounts Receivable - Tenants Rents	14,319
126.1	Allowance for Doubtful Accounts - Tenants	(11,727)
	Total Receivables, Net	<u>2,592</u>
142	Prepaid Expenses and Other Assets	9,842
	Total Current Assets	<u>233,070</u>
<b>NONCURRENT ASSETS</b>		
Capital Assets:		
161	Land	8,400
162	Buildings	561,950
163	Furniture and Equipment - Dwelling	16,129
165	Leasehold Improvements	45,254
166	Accumulated Depreciation	(621,159)
	Total Capital Assets, Net	<u>10,574</u>
	Total Assets	<u><u>\$ 243,644</u></u>

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
FINANCIAL DATA SCHEDULES (CONTINUED)  
DECEMBER 31, 2022**

Line Item #	Accounts Description	Project Total
<b>LIABILITIES AND NET POSITION</b>		
<b>CURRENT LIABILITIES</b>		
312	Accounts Payable < 90 Days	\$ 11,678
321	Accrued Wages/Payroll Taxes Payable	250
322	Accrued Compensated Absences - Current	426
333	Accounts Payable - Other Government	5,258
341	Tenant Security Deposits	4,395
342	Unearned Revenue	1,090
	Total Current Liabilities	23,097
<b>NONCURRENT LIABILITIES</b>		
354	Accrued Compensated Absences - Long-Term	65
	Total Liabilities	23,162
<b>NET POSITION</b>		
508.4	Investment in Capital Assets	10,574
512.4	Unrestricted	209,908
	Total Net Position	220,482
	Total Liabilities and Net Position	\$ 243,644

**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
FINANCIAL DATA SCHEDULES (CONTINUED)  
YEAR ENDED DECEMBER 31, 2022**

Line Item #	Accounts Description	Total Project
<b>REVENUE</b>		
70300	Net Tenant Rental Revenue	\$ 63,382
70500	Total Tenant Revenue	<u>63,382</u>
70600	HUD PHA Operating Grants	44,229
71100	Investment Income - Unrestricted	28
71500	Other Revenue	<u>7,388</u>
	Total Revenue	115,027
<b>EXPENSES</b>		
Administrative:		
91100	Administrative Salaries	5,378
91200	Auditing Fees	4,578
91300	Management Fees	5,098
91500	Employee Benefit Contributions	1,825
91600	Office Expenses	2,861
91800	Travel	61
91900	Other	<u>9,314</u>
	Total Administrative	29,115
Utilities:		
93200	Electricity	926
93600	Sewer	<u>9,593</u>
	Total Utilities	10,519
Ordinary Maintenance and Operations:		
94200	Materials and Other	3,971
94300	Contracts	<u>42,165</u>
	Total Ordinary Maintenance and Operations	46,136



**HOUSING AUTHORITY OF THE CITY OF OLIVETTE  
FINANCIAL DATA SCHEDULES (CONTINUED)  
YEAR ENDED DECEMBER 31, 2022**

Line Item #	Accounts Description	Total Project
	<b>EXPENSES (Continued)</b>	
	Protective Services:	
95200	Other Contract Costs	\$ 233
95000	Total Protective Services	<u>233</u>
	Insurance Premiums:	
96110	Property Insurance	4,983
96120	Liability Insurance	2,112
96130	Workmen's Compensation	64
96140	All Other Insurance	374
96100	Total Insurance Premiums	<u>7,533</u>
	General Expenses:	
96300	Payments In Lieu Of Taxes	5,257
96400	Bad Debt - Tenant Rents	866
	Total General Expenses	<u>6,123</u>
	Total Operating Expenses	<u>99,659</u>
	Excess of Operating Revenue Over Operating Expenses	15,368
97400	Depreciation Expense	1,399
	Total Expenses	<u>101,058</u>
	<b>EXCESS OF REVENUE OVER EXPENSES</b>	<u><u>\$ 13,969</u></u>
	<b>Memo Account Information</b>	
11020	Required Annual Debt Principal Payments	\$ -
11030	Beginning Equity	172,862
11040	Prior Period Adjustments, Equity Transfers, and Correction	-
11190	Unit Months Available	168
11210	Unit Months Leased	168
11270	Excess Cash	205,977
11620	Building Purchases	-
11640	Furniture and Equipment - Administrative Purchases	-
11650	Leasehold Improvement Purchases	-

## Memorandum



**To:** Board of Commissioners, Housing Authority of the City of Olivette

**From:** Shannon Koenig, Executive Director and CEO

**Date:** August 22, 2023

**Subject:** *Executive Director's Report*

---

This memo provides information about select Housing Authority activities.

**I. Public Housing Tour**

After today's public housing tour, staff will begin analyzing data gathered on the tour and will continue facilitating conversations about redevelopment options.

**II. Communications**

Staff continue to work with Bailey & Co. on modernizing the housing authority's brand. The first official rendering of the county's logo, as well as the Olivette Housing Authority logo, are ready to share with Commissioners. The next step is adopting a brand narrative as well as other visual brand elements.

There is also a team working on updating the website to provide information better and faster to residents, landlords, and the public. The new brand elements will be incorporated into the updated website.

**III. Main Facility Upgrade**

Staff are actively working with HDA on mapping out physical facility needs.



**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director and CEO

**From:** Carolyn Riddle, Interim Finance Director

**Date:** August 22, 2023

**Subject:** *Financial Summary*

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This memo provides a financial summary of activities through June 30, 2023.

**I. Recommendation**

Staff recommend the Board approve the financial statements as prepared.

**II. Highlights**

**A. Revenue**

The total operating income is over budget by about 2% which is primarily due to the timing of capital grants drawdowns. There was no operating subsidy drawn down in June due to an over-draw down in May, so the year-to-date operating subsidy is over the projected amount.

**B. Expense**

Total operating expenses are under budget by about 27%. This is mainly due to salaries and benefits coming in under budget and the timing of contract costs.

**C. Net Income**

Total operating net income is \$28,575. However, the total net income is \$28,462 including depreciation expense.

**D. Cash**

As of June 30, 2023, the cash balance in the operating bank account was \$235,560. No operating subsidy was received in June due to an over-draw of operating subsidy in May, tenant rental income for the month was \$5,405 and operating expenses were \$10,744.

**III. Attachments**

- A. Budgeted Income Statement
- B. Cash Report
- C. Tenant Rents

**Olivette Housing Authority**  
**Budgeted Income Statement**  
**As of June 30, 2023**

					<b>Olivette HA</b>			
	<b>YTD Actual</b>	<b>YTD Budget</b>	<b>Variance</b>	<b>% Variance</b>	<b>Monthly Actual</b>	<b>Monthly Budget</b>	<b>Variance</b>	<b>% Variance</b>
<b>OPERATING ITEMS</b>								
Total Operating Subsidy	36,449	21,608	14,841		-	3,601	(3,601)	
Total Capital Grants	659	13,879	(13,220)		-	2,313	(2,313)	
Total Tenant Charges	32,532	32,749	(217)		5,405	5,458	(53)	
Total Investment Income	135	5	130		29	1	28	
Total Miscellaneous Other Income	-	8	(8)		-	1	(1)	
<b>Total Income</b>	<b>69,775</b>	<b>68,249</b>	<b>1,526</b>	<b>2.24%</b>	<b>5,434</b>	<b>11,375</b>	<b>(5,941)</b>	<b>-52.23%</b>
Total Rents and Utility Reimbursements	-	269	(269)		-	45	(45)	
Total Salaries	10,740	16,019	(5,280)		2,135	2,670	(534)	
Total Benefits and Taxes	3,619	4,424	(805)		604	737	(133)	
Total Training, Seminars, Conferences	-	38	(38)		-	6	(6)	
<b>Total Admin</b>	<b>14,358</b>	<b>20,750</b>	<b>(6,392)</b>	<b>-30.80%</b>	<b>2,740</b>	<b>3,458</b>	<b>(719)</b>	<b>-20.78%</b>
Total Utilities	4,715	5,601	(887)		1,078	934	144	
Total Materials	1,648	2,302	(654)		490	384	107	
Total Contract Costs	2,994	10,619	(7,626)		1,454	1,770	(316)	
Total Tenant Services Expense	-	-	-		-	-	-	
Total Other Maintenance Expenses	538	746	(208)		22	124	(102)	
Total Outside Services	-	-	-		-	-	-	
Total Other Occupancy Expenses	7,055	2,858	4,197		4,620	476	4,144	
<b>Total Occupancy Expense</b>	<b>16,950</b>	<b>22,126</b>	<b>(5,176)</b>	<b>-23.40%</b>	<b>7,664</b>	<b>3,688</b>	<b>3,976</b>	<b>107.82%</b>
Total Insurance	4,058	4,143	(85)		-	690	(690)	
Total Outside Services	176	-	176		51	-	51	
Total Professional Fees	10	1,622	(1,612)		-	270	(270)	
Total Other Fees	3,993	5,564	(1,572)		-	927	(927)	
Total Telephone and Technology	481	477	5		48	79	(31)	
Total Other Administrative Expenses	1,174	1,540	(366)		241	257	(15)	
<b>Total Other General</b>	<b>9,892</b>	<b>13,346</b>	<b>(3,454)</b>	<b>-25.88%</b>	<b>340</b>	<b>2,224</b>	<b>(1,884)</b>	<b>-84.69%</b>
<b>Total Expenses</b>	<b>41,200</b>	<b>56,222</b>	<b>(15,023)</b>	<b>-26.72%</b>	<b>10,744</b>	<b>9,370</b>	<b>1,374</b>	<b>14.66%</b>
<b>Total Net Operating Income</b>	<b>28,575</b>	<b>12,027</b>	<b>16,549</b>		<b>(5,310)</b>	<b>2,004</b>	<b>(7,314)</b>	
<b>NON-OPERATING ITEMS</b>								
Total Depreciation Expense	(114)	(117)	3		(19)	(19)	0	
<b>Total Non- Operating Items</b>	<b>(114)</b>	<b>(117)</b>	<b>3</b>		<b>(19)</b>	<b>(19)</b>	<b>0</b>	
<b>Net Income (Loss)</b>	<b>28,462</b>	<b>11,909</b>	<b>16,552</b>		<b>(5,329)</b>	<b>1,985</b>	<b>(7,314)</b>	



Olivette Housing Authority (1132bolv)

**Account Detail**

Period = Jun 2023

Book = Accrual

Property	Account	Date	Period	Person	Control	Reference	Amount	Remarks
1132bolv	4300-00-240	Tenant Rent	3/1/2023	06-2023	t0000310	C-154094 :TRC :03/23	-813.00	RENT ADJ 03/23
1132bolv	4300-00-240	Tenant Rent	3/1/2023	06-2023	t0000310	C-154095 :TRC :03/23	875.00	Rent 03/23
1132bolv	4300-00-240	Tenant Rent	4/1/2023	06-2023	t0000310	C-154096 :TRC :04/23	-813.00	RENT ADJ 04/23
1132bolv	4300-00-240	Tenant Rent	4/1/2023	06-2023	t0000310	C-154097 :TRC :04/23	875.00	Rent 04/23
1132bolv	4300-00-240	Tenant Rent	5/1/2023	06-2023	t0000310	C-154098 :TRC :05/23	-813.00	RENT ADJ 05/23
1132bolv	4300-00-240	Tenant Rent	5/1/2023	06-2023	t0000310	C-154099 :TRC :05/23	875.00	Rent 05/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0010954	C-154100 :TRC :06/23	286.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000323	C-154101 :TRC :06/23	234.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0012183	C-154102 :TRC :06/23	4.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0018158	C-154103 :TRC :06/23	875.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000325	C-154104 :TRC :06/23	349.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000694	C-154105 :TRC :06/23	501.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000307	C-154106 :TRC :06/23	172.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000313	C-154107 :TRC :06/23	367.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0012791	C-154108 :TRC :06/23	243.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0010032	C-154109 :TRC :06/23	469.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000316	C-154110 :TRC :06/23	160.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000248	C-154111 :TRC :06/23	583.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000247	C-154112 :TRC :06/23	349.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/1/2023	06-2023	t0000310	C-154113 :TRC :06/23	875.00	Rent 06/23
1132bolv	4300-00-240	Tenant Rent	6/20/2023	06-2023	t0000310	C-154217	-62.00	overpayment March
1132bolv	4300-00-240	Tenant Rent	6/20/2023	06-2023	t0000310	C-154218	-62.00	overpayment April
1132bolv	4300-00-240	Tenant Rent	6/20/2023	06-2023	t0000310	C-154219	-62.00	overpayment May
1132bolv	4300-00-240	Tenant Rent	6/20/2023	06-2023	t0000310	C-154220	-62.00	overpayment June
<b>Total</b>							<b>5,405.00</b>	



## Memorandum

**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director, and CEO

**From:** Carolyn Riddle, Interim Finance Director

**Date:** August 22, 2023

**Subject:** *FY24 Proposed Budget, Resolution No. 1423*

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This memo accompanies the proposed FY24 budget and provides a list of budget assumptions and notes.

**I. Recommendation**

Staff recommend the Board approve Resolution No. 1423 for FY24 Proposed Budget as submitted.

**II. Budget Assumptions and Notes**

- A. The budget assumes unit occupancy of 98%, which matches the occupancy rate for the past year.
- B. Operating subsidy for 2024 is \$94,885, which is based on the 2023 operating fund calculation and the 2023 annualized amount received.
- C. Tenant rent is based on 2023 annualized actual amounts with no expected increase.
- D. Salaries expense reflects management staffing plan for the year.
- E. Employee benefits expense is estimated to be about 21% of salaries expense.
- F. Contract costs are estimated to increase based on prior years' activity. This will include one unit repair and new maintenance uniforms.
- G. Emergency per diem cost is \$472.
- H. Information technology costs for software and licensing fees are expected to increase.
- I. Payment in Lieu of Taxes (PILOT) expense is based on the current year's calculation of 10% of rental income less utilities expense.

- J. Insurance expense is estimated to increase by 10%.
- K. Audit expense is based on the cost of the 2022 audit.
- L. HASLC fees are expected to increase according to HUD guidelines for calculating the fees for management services, which include the property management fee rate of \$53.07, the asset management fee rate of \$10, and bookkeeping fee rate of \$7.50 multiplied by units leased and available.
- M. A net operating income of \$44,843 is expected for 2024, but after depreciation expense, that total net income is expected to be \$43,444.

**III. Attachment**

- A. FY24 Proposed Budget



Olivette Housing Authority  
 FY24 Proposed Budget

		2023	2023	
		Annualized Actual	Annual Budget	2024 Budget
4000-00-120	OPERATING INCOME			
4000-00-130	Income			
4100-00-140	Operating Subsidy			
4100-00-240	HUD PHA Operating Grants/Subsidy	87,477.60	43,215.72	94,885.00
4199-00-940	Total Operating Subsidy	87,477.60	43,215.72	94,885.00
4300-00-140	Tenant Charges			
4300-00-240	Tenant Rent	65,104.80	65,498.76	65,104.80
4399-00-940	Total Tenant Charges	65,104.80	65,498.76	65,104.80
4500-00-140	Other Income			
4500-00-150	Investment Income			
4500-00-250	Investment Income - Unrestricted	255.02	10.92	262.67
4599-00-250	Total Investment Income	255.02	10.92	262.67
4600-00-150	Miscellaneous Other Income			
4670-00-250	Miscellaneous Other Income	-	15.36	100.00
4699-00-950	Total Miscellaneous Other Income	-	15.36	100.00
4998-00-940	Total Other Income	255.02	26.28	362.67
4999-00-930	Total Income	152,837.42	108,740.76	160,352.47
5000-00-130	EXPENSES			
5000-00-140	Rents and Utility Reimbursements			
5050-00-240	Utility Reimbursement	-	537.72	-
5999-00-940	Total Rents and Utility Reimbursements	-	537.72	-
6000-00-140	Salaries			
6000-00-150	Salaries - Administrative			
6000-00-250	Salaries - Administrative	8,673.00	32,038.44	13,840.80
6099-00-950	Total Salaries - Administrative	8,673.00	32,038.44	13,840.80
6100-00-150	Salaries - Tenant Services			
6100-00-250	Salaries - Tenant Services	1,107.70	-	1,767.72

Olivette Housing Authority  
 FY24 Proposed Budget

		2023	2023	
		Annualized Actual	Annual Budget	2024 Budget
6199-00-950	Total Salaries - Tenant Services	1,107.70	-	1,767.72
6200-00-150	Salaries - Maintenance			
6200-00-250	Salaries - Maintenance	5,529.65	-	8,824.48
6298-00-950	Total Salaries - Maintenance	5,529.65	-	8,824.48
6299-00-940	Total Salaries	15,310.34	32,038.44	24,433.00
6300-00-140	Benefits and Taxes			
6300-00-150	Employee Benefits - Administrative			
6300-00-250	Insurance - Dental - Administrative	43.03	134.52	107.58
6305-00-250	Insurance - Health - Administrative	1,132.13	3,160.56	2,830.32
6315-00-250	Insurance - STD - Administrative	76.15	209.28	190.38
6320-00-250	Insurance - LTD - Administrative	51.48	109.68	128.70
6325-00-250	Insurance - Life - Administrative	75.72	175.32	189.30
6330-00-250	Insurance - Long-Term - Administrative	9.19	87.00	22.98
6335-00-250	Insurance - Vision - Administrative	3.86	11.40	9.66
6350-00-250	Other - Pension - Administrative	563.74	2,739.84	1,409.34
6365-00-250	Taxes - FICA - Administrative	634.85	2,163.12	1,587.12
6370-00-250	Taxes - Unemployment - Administrative	69.58	57.00	173.94
6399-00-950	Total Employee Benefits - Administrative	2,659.73	8,847.72	6,649.32
6400-00-150	Employee Benefits - Tenant Services			
6405-00-250	Insurance - Health - Tenant Services	442.66	-	455.94
6465-00-250	Taxes - FICA - Tenant Services	70.66	-	72.78
6499-00-950	Total Employee Benefits - Tenant Services	513.31	-	528.71
6500-00-150	Employee Benefits - Maintenance			
6505-00-250	Insurance - Health - Maintenance	1,471.03	-	1,515.16
6550-00-250	Other - Pension - Maintenance	78.12	-	80.46
6565-00-250	Taxes - FICA - Maintenance	385.39	-	396.95
6570-00-250	Taxes - Unemployment - Maintenance	55.70	-	57.38
6598-00-950	Total Employee Benefits - Maintenance	1,990.25	-	2,049.96
6599-00-940	Total Benefits and Taxes	5,163.29	8,847.72	9,227.99

Olivette Housing Authority  
 FY24 Proposed Budget

		2023	2023	
		Annualized Actual	Annual Budget	2024 Budget
6700-00-140	Training, Seminars, Conferences			
6720-00-240	Training - Administration	-	40.08	-
6730-00-240	Training - Maintenance	-	36.48	-
6799-00-940	Total Training, Seminars, Conferences	-	76.56	-
7000-00-140	Occupancy			
7000-00-150	Utilities			
7005-00-250	Electricity-Vacant Units	755.88	947.16	778.56
7010-00-250	Electricity - Office	319.30	290.28	328.87
7030-00-250	Sewer	7,612.94	9,929.64	7,841.33
7035-00-250	Sewer - Office	19.15	24.00	19.73
7050-00-250	Water - Office	22.18	11.88	22.84
7099-00-950	Total Utilities	8,729.45	11,202.96	8,991.33
7100-00-150	Materials			
7100-00-250	Maintenance Paper/Supplies	112.56	-	115.94
7130-00-250	Supplies - Janitorial/Cleaning	100.25	24.60	103.26
7135-00-250	Supplies - Maintenance / Repairs	2,522.30	4,370.88	2,597.97
7140-00-250	Supplies - Plumbing	42.41	207.72	43.68
7199-00-950	Total Materials	2,777.52	4,603.20	2,860.85
7200-00-150	Contract Costs			
7200-00-250	Contract - Trash	1,497.60	2,829.84	2,500.00
7205-00-250	Contract - HVAC	-	4,163.76	2,500.00
7220-00-250	Contract - Grounds	1,440.00	9,115.56	13,000.00
7225-00-250	Contract - Unit Repair	-	14.16	6,000.00
7230-00-250	Contract - Electrical	480.00	-	494.40
7235-00-250	Contract - Plumbing	-	2,147.52	1,400.00
7245-00-250	Contract - Janitorial/Cleaning	193.58	2,698.08	1,800.00
7255-00-250	Contract - Alarm Monitoring	84.55	63.24	87.09
7265-00-250	Contract - Building Repairs	-	206.40	-
7299-00-950	Total Contract Costs	3,695.74	21,238.56	27,781.49
7300-00-150	Tenant Services Expense			
7310-00-250	Other Tenant Services			472.00
7399-00-950	Total Tenant Services Expense			472.00

Olivette Housing Authority  
 FY24 Proposed Budget

		2023	2023	
		Annualized Actual	Annual Budget	2024 Budget
7400-00-150	Other Maintenance Expenses			
7400-00-250	Maintenance Uniforms	-	69.36	800.00
7420-00-250	Vehicle Maintenance	1,118.81	1,422.48	1,152.37
7499-00-950	Total Other Maintenance Expenses	1,118.81	1,491.84	1,952.37
7600-00-150	Other Occupancy Expenses			
7630-00-250	Payments in Lieu of Taxes	3,304.37	5,462.16	5,648.49
7640-00-250	Security/Law Enforcement	207.36	253.68	213.58
7699-00-950	Total Other Occupancy Expenses	3,511.73	5,715.84	5,862.07
7999-00-940	Total Occupancy	19,833.24	44,252.40	47,920.11
8000-00-140	Other Admin Expenses			
8000-00-150	Insurance			
8000-00-250	Insurance - Automobile	325.63	411.36	358.20
8010-00-250	Insurance - Liability	1,704.38	2,323.68	1,874.82
8020-00-250	Insurance - Property	5,760.67	5,481.36	6,336.74
8030-00-250	Insurance - Worker's Comp	26.59	69.12	29.25
8099-00-950	Total Insurance	7,817.28	8,285.52	8,599.01
8100-00-150	Outside Services			
8100-00-250	Consultants	198.05	-	203.99
8110-00-250	Temporary Administrative Labor	101.64	-	104.69
8199-00-950	Total Outside Services	299.69	-	308.68
8200-00-150	Professional Fees			
8220-00-250	Professional Fees - Legal	24.60	-	25.34
8220-00-250	Professional Fees - Audit	-	3,244.56	4,600.00
8299-00-950	Total Professional Fees	24.60	3,244.56	4,625.34
8300-00-150	Other Fees			
8300-00-250	Bank Fees	536.38	616.92	552.47
8920-00-250	Bookkeeping Management Fee Expense			1,234.80
8910-00-250	Asset Management Fee Expense			1,680.00
8320-10-250	Management Fee - HASLC	7,816.58	10,511.76	8,737.44

Olivette Housing Authority  
 FY24 Proposed Budget

		2023	2023	
		Annualized Actual	Annual Budget	2024 Budget
8399-00-950	Total Other Fees	8,352.96	11,128.68	12,204.71
8400-00-150	Telephone and Technology			
8410-00-250	Contract - Answer Service	71.59	71.04	73.74
8430-00-250	Internet	68.26	87.00	70.30
8440-00-250	Small Office Equipment	337.78	-	347.91
8450-00-250	Software/License Fees	327.74	419.88	2,261.24
8460-00-250	Telephone	234.14	375.24	241.17
8499-00-950	Total Telephone and Technology	1,039.51	953.16	2,994.36
8500-00-150	Other Administrative Expenses			
8504-00-250	Advertising	679.34	-	699.72
8508-00-250	Copiers/Printers	164.54	230.88	169.48
8540-00-250	Meetings	-	409.56	-
8544-00-250	Membership/Publications	18.84	12.12	19.41
8548-00-250	Office Supplies	96.82	25.68	99.72
8560-00-250	Postage / Delivery	215.54	446.88	222.01
8576-00-250	Travel	55.90	68.88	57.57
8580-00-250	Other Misc. Admin Expenses	470.38	1,886.04	2,000.00
8599-00-950	Total Other Administrative Expenses	1,701.36	3,080.04	3,267.91
8997-00-940	Total Other Administrative Expenses	19,235.40	26,691.96	32,000.01
8998-00-930	TOTAL EXPENSES	59,542.27	112,444.80	113,581.10
8999-00-920	Operating Income	93,295.15	(3,704.04)	46,771.37
9000-00-120	NON-OPERATING ITEMS			
9000-00-130	Depreciation Expense			
9000-00-230	Depreciation Expense	(227.40)	(234.24)	(1,399.00)
9099-00-930	Total Depreciation Expense	(227.40)	(234.24)	(1,399.00)
9997-00-920	TOTAL NON-OPERATING ITEMS	(227.40)	(234.24)	(1,399.00)
9998-00-910	NET INCOME	93,067.75	(3,938.28)	45,372.37



## Memorandum

**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director and CEO

**From:** Emily Smith, Director of Program Compliance and Training

**Date:** August 22, 2023

**Subject:** *2024 Annual PHA Plan and Certification of Compliance*

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This memo provides an overview of the Housing Authority of the City of Olivette's annual plan requirements.

### I. Recommendation

Staff recommend that the Board review the Housing Authority of St. Louis County's 2024 Annual PHA Plan and authorize the Board Chairwoman to sign the Certification of Compliance with PHA Plans and Related Regulations.

### II. Overview

The Annual PHA Plan is a HUD-required document that details a housing authority's policies, programs, and strategies for meeting local housing needs and goals. The Housing Authority of St. Louis County's 2024 Annual PHA Plan describes the updates made to the organization's policies and planned activities for the upcoming fiscal year.

HUD requires most public housing authorities (PHAs) to submit a comprehensive Annual PHA Plan each year. Exemptions to this requirement are made for qualified PHAs, which do not have a combined public housing unit total of 550 or more and are not designated troubled by HUD. The Housing Authority of the City of Olivette is considered a qualified PHA.

As a qualified PHA, the Housing Authority of the City of Olivette is not required to submit its own Annual PHA Plan but must still submit a Certification of Compliance with PHA Plans and Related Regulations. The certification attests that the Housing Authority of the City of Olivette is abiding by the rules, regulations, and statutes in the Housing Authority of St. Louis County's Annual PHA Plan.

### III. Attachments

- A. Housing Authority of St. Louis County's 2024 Annual PHA Plan
- B. Certification of Compliance with PHA Plans and Related Regulations

<b>Annual PHA Plan</b> <i>(Standard PHAs and Troubled PHAs)</i>	<b>U.S. Department of Housing and Urban Development</b> <b>Office of Public and Indian Housing</b>	<b>OMB No. 2577-0226</b> <b>Expires: 03/31/2024</b>
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**Purpose.** The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

**Applicability.** The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

**Definitions.**

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																	
A.1	<p> <b>PHA Name:</b> _____ Housing Authority of St. Louis County _____ <b>PHA Code:</b> _____ MO-004 _____  <b>PHA Type:</b> <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA  <b>PHA Plan for Fiscal Year Beginning:</b> (MM/YYYY): _____ 01/2024 _____  <b>PHA Inventory</b> (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above)  <b>Number of Public Housing (PH) Units</b> _____ 309 _____ <b>Number of Housing Choice Vouchers (HCVs)</b> _____ 6,718 _____ <b>Total Combined Units/Vouchers</b> _____ 7,027 _____  <b>PHA Plan Submission Type:</b> <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> <b>Availability of Information.</b> PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <b><u>The Draft 2024 PHA Annual Plan is available for viewing at the following locations:</u></b> </p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; border: none;">           PHA Main Administrative Office            8865 Natural Bridge Road            St. Louis, MO 63121         </td> <td style="width: 33%; border: none;">           PHA Site Management Office Arbor Hill            133 Grape Avenue            Maryland Heights, MO 63043         </td> <td style="width: 33%; border: none;">           PHA Site Management Office Highview            2876 West Pasture            St. Louis, MO 63114         </td> </tr> </table> <p>           Housing Authority of St. Louis County            Website at <a href="http://www.haslc.com">www.haslc.com</a> </p> <p> <input type="checkbox"/> <b>PHA Consortia:</b> (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td style="height: 30px;">Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	PHA Main Administrative Office 8865 Natural Bridge Road St. Louis, MO 63121	PHA Site Management Office Arbor Hill 133 Grape Avenue Maryland Heights, MO 63043	PHA Site Management Office Highview 2876 West Pasture St. Louis, MO 63114	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:					
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				PH	HCV													
Lead PHA:																		

**B. Plan Elements**

**B.1 Revision of Existing PHA Plan Elements.**

(a) Have the following PHA Plan elements been revised by the PHA?

Y	N	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Statement of Housing Needs and Strategy for Addressing Housing Needs
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Financial Resources.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Rent Determination.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Operation and Management.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Grievance Procedures.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Homeownership Programs.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Community Service and Self-Sufficiency Programs.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Safety and Crime Prevention.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pet Policy.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Asset Management.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Substantial Deviation.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Significant Amendment/Modification

(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):

**STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS**

Where an individual lives affects nearly every aspect of life, from the quality of education they receive to their physical health and wellbeing. Simply being housed is not enough to determine future success, in St. Louis County where one lives also matters. Access to jobs, transit, quality schools, and healthcare all shape a person’s future.

The mission of the Housing Authority of St. Louis County (Authority) is to provide housing options and support at multiple stages of an individual’s housing journey. This begins with placing a client in decent, safe, and affordable housing and ensuring their right to equal housing opportunities but extends to specialized programming and partnerships to promote self-sufficiency. Ultimately the goal of the Authority is to improve the quality of life for low- and moderate-income families and individuals.

Families in search of affordable housing in St. Louis County face considerable challenges. These challenges are more acute for extremely low-income families, elderly and disabled individuals, and households of certain races and ethnicities. The U.S. Department of Housing and Urban Development (HUD) has identified four major housing problems affecting low- and moderate-income households:

- substandard housing (i.e., housing lacking complete plumbing or kitchen facilities),
- overcrowding (i.e., more than one person per room),
- cost burden (i.e., spending more than 30% of income on housing costs), and
- severe cost burden (i.e., spending greater than 50% of income on housing costs).

Below are the specific needs of families with incomes below 30% of the Area Median Income (AMI), elderly families, households with individuals with disabilities, and households of certain races and ethnic groups.

Housing Needs for Extremely Low-income Families (30% AMI)

Across Missouri and St. Louis County, there is a shortage of affordable rental homes available to families whose household incomes are at or below the poverty guideline. Many of these households are severely cost-burdened, spending more than half of their income on housing. According to Comprehensive Housing Affordability Strategy (CHAS) data from 2019, of the 405,985 households in St. Louis County, there are 29,990 renter households and 48,175 total households with a household income below 30% AMI. Severely cost burdened households are more likely than other renters to sacrifice health care and food costs in order to pay rent. According to the National Low Income Housing Coalition, these households are also much more likely to experience unstable housing situations like evictions and homelessness.

Extremely low-income households face a severe shortage of housing supply. According to the Affordable STL's *Affordable Housing Report Card (2021)* which assesses affordable housing needs in St. Louis City and County, renters with budgets of \$2,000 per month for rent have the choice of ten times as many units than renters with rental budgets of \$550.

Currently, there are approximately 442,243 housing units for 998,684 people in the County, according to St. Louis County’s 2021-2025 *Affordable Housing and Homeless Services Investment Strategic Plan*. Low-income families are forced to compete for these available units with those who have the income to afford more expensive places to live. Only about one in four households in the lowest income bracket have access to income-restricted subsidized housing. The greatest need in the St. Louis region is for one-, two-, and three-bedroom affordable units.

In terms of housing quality, maintenance and accessibility are often an issue for extremely low-income families. According to the St. Louis HOME Consortium’s *Analysis of Impediments to Fair Housing Choice (2021)*, lack of availability to accessible housing is one of the eight main impediments to housing choice in the St. Louis area. While older homes are less expensive to purchase, the cost of



maintaining them can create a significant financial challenge for low-to moderate-income households. According to St. Louis County's *Consolidated Plan (2021)* data, in St. Louis County 745 extremely low-income rental households are faced with substandard housing, lacking complete plumbing or kitchen facilities. Overcrowding and severe overcrowding (homes with greater than 1.01-1.5 people per room and homes with greater than 1.51 people per room, respectively), affect 797 extremely low-income rental households.

Affordable housing in the County tends to be concentrated in areas of low opportunity that lack the resources of areas of high opportunity. These conditions make it more likely that families in poverty remain in poverty. According to 2019 ACS data, poverty is higher in North St. Louis County when compared to the rest of the County. Vacancy rates, foreclosures, and evictions are all higher in North County than the rest of the County, while home values are lower.

The *Affordable Housing Report Card (2021)* states that 42% of Housing Choice vouchers are used in five municipalities in North St. Louis County: Florissant, Ferguson, Spanish Lake, Jennings, and Bellefontaine Neighbors, while the largest and wealthiest municipalities in the County (Wildwood, Clayton, Town and Country, Ladue, and Brentwood) have no voucher households at all. New construction exacerbates this place-based problem, as more new development primarily occurs in the central, west, and south subareas of the County. Multifamily housing, however, is concentrated in the northern regions of the County.

#### Elderly Families

The elderly population in St. Louis County is increasing and will continue increasing as baby boomers age. According to 2021 ACS data, about 19% of St. Louis County's total population is 65 years old or older. Of all adults over the age of 65 in the County, about 7% live below the federal poverty level and according to *Affordable Housing and Homeless Services Investment Strategic Plan (2021)*, seniors living in North St. Louis County are among the most likely to be cost burdened.

Issues of quality and accessibility disproportionately affect elderly households, as household income typically decreases post-working years and retrofits are often needed to allow adults to age in place. Harvard University's Joint Center for Housing Studies' *State of the Nation's Housing Report (2022)* states that most U.S. homes across the country lack basic accessibility features, such as no-step entryways and grab-bars in bathrooms would allow older adults to remain in their homes as they age.

The housing stock in the County is aging as well, making it more likely that homeowners, elderly or not, will need to make improvements to their home to maintain livability. The majority of St. Louis County's single-family housing stock was built prior to 1970 and most were built in the 1950s and 1960s. The oldest homes are clustered in North St. Louis County bordering St. Louis City.

#### Households with Individuals with Disabilities

According to 2015-2019 ACS data, 12% of the County's population has a disability and 69% of that group is under age 65. The lack of accessible housing in St. Louis County and the concentration of affordable housing in low-opportunity areas with fewer resources make it difficult for families with disabilities to find housing. The short supply of affordable housing is compounded when an individual in a household is disabled and needs a home with accessibility modifications. As discussed above, many of the affordable housing units in the County are aging and are less likely to be accessible. With many protected classes having lower than average incomes, housing affordability becomes a critical aspect of fair access to housing.

Disability is cited in the *Consolidated Plan* as one of the main risk factors for individuals and families to being evicted and becoming unhoused. Local zoning restrictions make it difficult for residents with disabilities to locate housing in certain St. Louis County neighborhoods or to modify housing to make it more accessible. Additionally, administrative and citing constraints for group homes for persons with disabilities create further barriers to safe, accessible housing.

#### Households of Various Races and Ethnic Groups

Race has shaped the social fabric and physical infrastructure of St. Louis County. An assessment of affordable housing in the County cannot be discussed without an examination of the role race plays in where resources are allocated. The legacy of racially motivated housing policies in the County and the nation mean that people of color are more likely to live in poverty and be disproportionately affected by the lack of affordable housing. According to 2019 ACS data, out of 87,337 total County residents living in poverty, 43,402 are Black or African American. Black or African American (23.3%) and/or Hispanic female headed households (65.3%) have the highest poverty rates in the County. Low- and extremely low-income Black or African American families are more likely to be housing cost burdened and severely housing cost burdened, and evictions and foreclosures are concentrated in majority-Black or African American areas of both St. Louis City and County.

In North St. Louis County, the majority of low- and extremely low-income Black or African American renters experience housing cost burden. According to the *Affordable Housing Report Card (2021)*, in some census tracts in North St. Louis County, half of the renters are paying 30% or more of their monthly income on housing costs and the population of those census tracts is nearly entirely Black or African American.

HUD defines a group as having disproportionate need if its members experience housing needs at a rate that is 10% or greater than those of white households. While 23% of White St. Louis County households have housing problems, these problems disproportionately affect 33% of Native American and other non-Hispanic households, 35% of Hispanic households and 42% of Black or African American households.

Economic mobility, the likelihood that a family will progress up the income ladder over generations, is much less likely for Black or African American families in St. Louis County compared with the White population. Disproportionate rates of Black and White homeownership mean that Black or African American households are less likely to build wealth through homeownership. In the

United States, 45% of Black or African American households are homeowners compared with 73% of White American households, according to 2019 ACS data.

For those Black or African Americans who do own homes in the County, funding the upkeep is more difficult. The *Affordable Housing Report Card (2021)* found that Black or African American applicants were more than twice as likely to be denied a home improvement loan than White applicants in 2020. Changes in the housing market that allowed existing homeowners to build equity during the COVID-19 pandemic further exacerbated inequities between those who can afford to own a home and those who cannot.

#### Strategy for Addressing Housing Needs

The PHA developed internal and external strategies and is taking a data-driven approach to addressing clients' housing needs. The Authority adopted the following core objectives and key results to measure its progress in 2023:

#### **Objective 1:** Deliver services safely, effectively, and efficiently.

The first objective speaks to establishing excellence in the Authority's basic operations. Streamlined processes and procedures and an emphasis on quality control ensure that residents' housing needs are met. Findings on the finance/single audit along with earned PHAS, SEMAP, and MHDC scores indicate how well those processes and procedures work.

#### **Objective 2:** Ensure residents, landlords, and employees feel respected during interactions with the Authority.

Every client or employee at the PHA deserves to be treated with respect and empathy. Staff is working to increase customer service quality so that it is easy to do business with the Authority, simple to find the information that residents need, that employees are helpful and care, and that everyone is treated fairly.

#### **Objective 3:** Help our residents and families gain self-sufficiency through partnerships with other organizations in the community.

Last year, the PHA completed a partnership plan to establish which organizations in the community can aid in providing supportive services to residents. These partnerships are prioritized based on the services they offer and their capacity to serve Authority residents. A team is currently working on putting more formal relationships in place in order to increase housing stability and self-sufficiency for residents.

#### **Objective 4:** Expand access to desirable and affordable housing.

The Authority's strategy for expanding access will be targeted at:

- a. Primarily extremely low-income (30% AMI), elderly, and disabled households; using an equity lens, to:
  - i. Increase production of rental units
  - ii. Preserve existing units
  - iii. Improve quality and eliminate substandard housing
  - iv. Improve housing stability
- b. New production for lower income levels, including workforce and mixed-income housing.
- c. Increasing homeownership opportunities.
- d. Increasing mobility.

#### **DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS**

Please see Section B.1(c) of this document for the Authority's De-concentration Policy.

The Authority is in the process of revising its Admissions and Continued Occupancy Policy (ACOP). Please see Attachment 1: Applications, Waiting List and Tenant Selection for the drafted update to this policy within the ACOP.

#### **FINANCIAL RESOURCES**

##### Annual Contribution by Program - 2024

Housing Choice Voucher	61,077,760
Mainstream Voucher	2,350,723
Emergency Housing Voucher	1,302,455
Family Self-Sufficiency	189,000
Moderate Rehab	162,705
Operating Subsidy	812,059
Capital Funds	1,717,217
	<hr/>
	67,611,919

#### **RENT DETERMINATION**

\*Revisions pending HOTMA requirements

#### **OPERATION AND MANAGEMENT**

Please see Attachment 2: Operation and Management for the drafted update to this policy within the ACOP.

#### **GRIEVANCE PROCEDURES**

Please see Attachment 3: Grievance Procedures for the drafted update to this policy within the ACOP.

**COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS**

Please see Attachment 4: Priority Partnership Framework; and Attachment 5: Community Service and Self-Sufficiency Policy

**(c) The PHA must submit its De-concentration Policy for Field Office review.**

**DE-CONCENTRATION POLICY**

The Authority will use greater flexibility in attracting households with broader ranges of income. The Authority will continue to reassess flat rental amounts annually in public housing developments to potentially attract higher-income families and will continue to offer the choice of flat rent or income-based rent to residents residing in the developments. Other avenues to attract higher-income families being considered by the Authority are changes in waitlist admission preferences, more aggressive marketing of developments, ongoing evaluation of public housing inventory for capital improvements, and support from Landlord Liaisons.

A goal of the Landlord Liaisons is to connect with current and prospective property owners and landlords for the Housing Choice Voucher (HCV) program. The Landlord Liaisons will attempt to make these connections and refer HCV participants to property owners in high opportunity areas, and they continue to facilitate educational landlord meetings to attract and inform prospective landlords about the HCV program and its benefits.

The Authority is also updating its Community Service and Self-Sufficiency Requirements (CSSR) and Family Self-Sufficiency (FSS) program. The updates to the CSSR will offer more guidance and structure for public housing residents who are required to complete community service or self-sufficiency hours. Updates to the FSS program and continued administration of the program will allow the Authority to offer more direct support to program participants. Both the CSSR and FSS program will encourage and support participants in building wealth and gaining a better understanding of how to maintain self-sufficiency.

The Authority has also successfully begun establishing partnerships with other service agencies to offer more supportive services and resources to all its service population. These updates, new partnerships, and continued administration of the Family Self-Sufficiency will benefit participants and help deconcentrate poverty.

**B.2 New Activities.**

(a) Does the PHA intend to undertake any new activities related to the following in the PHA’s current Fiscal Year?

Y N

- Hope VI or Choice Neighborhoods.
- Mixed Finance Modernization or Development.
- Demolition and/or Disposition.
- Designated Housing for Elderly and/or Disabled Families.
- Conversion of Public Housing to Tenant-Based Assistance.
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD.
- Occupancy by Over-Income Families.
- Occupancy by Police Officers.
- Non-Smoking Policies.
- Project-Based Vouchers.
- Units with Approved Vacancies for Modernization.
- Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.

**MIXED FINANCE MODERNIZATION OR DEVELOPMENT**

The Authority has received low-income housing tax credits (LIHTC) for Arbor Hill Apartments as part of its activity for encouraging private equity investment in the development of affordable rental housing for low-income households. The Authority will build 68 new income-restricted housing units.

The Authority is also partnering with Peace United Church of Christ to develop approximately 48 affordable senior housing units in Webster Groves. This project will be funded in part with the equity from LIHTC and the Authority is examining the possibility of providing Project Based Vouchers to the project. This development will work to further the availability of affordable housing in opportunity areas and supports the goals of the mobility program.

**CONVERSION OF PUBLIC HOUSING TO PROJECT-BASED RENTAL ASSISTANCE OR PROJECT-BASED VOUCHERS UNDER RAD**

The Authority is in the process of converting the Arbor Hill Apartments to private ownership under HUD’s RAD program, using low-income housing tax credits.

**PROJECT-BASED VOUCHERS**

The Authority will allocate 186 project-based vouchers to the new development, Wellington Family Homes. The Authority will continue to maintain and manage the waiting list for project-based vouchers at Wellington Family Homes.

	<p>The Authority is also examining the possibility of providing project-based vouchers for the Webster Groves project with Peace United Church of Christ. The project will develop 48 affordable senior housing units in Webster Groves.</p> <p>The Authority has also successfully issued a Project-Based Voucher Request for Proposal (RFP) to begin allocating more project-based vouchers.</p>
<p><b>B.3</b></p>	<p><b>Progress Report.</b> Provide a description of the PHA’s progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p> <p><u>Mission</u> The Housing Authority of St. Louis County provides decent, safe, and affordable housing, ensures equal housing opportunity, promotes self-sufficiency, and improves the quality of life and economic vitality for low- and moderate-income families. The Authority pursues these goals by using existing federal programs to the maximum feasible extent, by linking with other service providers, and by creating new opportunities of its own design.</p> <p><u>Objectives and Key Results</u> In executing its mission, the Authority adopted four guiding objectives in 2021. The 2023 key results communicate to our employees, board members, and external stakeholders how well the agency is performing:</p> <p>Objective 1: Deliver services safely, effectively, and efficiently.</p> <ul style="list-style-type: none"> <li>● Key Results <ul style="list-style-type: none"> <li>○ Number of findings on our finance/single audit scores</li> <li>○ PHAS score</li> <li>○ SEMAP score</li> <li>○ MHDC scores</li> </ul> </li> </ul> <p>Objective 2: Ensure residents, landlords, and employees feel respected during interactions with the Authority.</p> <ul style="list-style-type: none"> <li>● Key Results <ul style="list-style-type: none"> <li>○ Active implementation of deliverables by the Customer Service Improvement Team</li> <li>○ Increase in customer satisfaction</li> </ul> </li> </ul> <p>Objective 3: Help our residents and families gain self-sufficiency through partnerships with other organizations in the community.</p> <ul style="list-style-type: none"> <li>● Key Results <ul style="list-style-type: none"> <li>○ Active implementation of deliverables by the Partnership Improvement Team</li> <li>○ Formally establish 3-5 Level 1 (emergency housing and crisis support) partnerships</li> </ul> </li> </ul> <p>Objective 4: Expand access to desirable and affordable housing.</p> <ul style="list-style-type: none"> <li>● Key Results <ul style="list-style-type: none"> <li>○ Close Wellston financing</li> <li>○ Close Arbor Hill financing</li> <li>○ Successful implementation of project-based voucher (PBV) request for proposal (RFP)</li> </ul> </li> </ul> <p>Thus far in 2023, Authority staff has made progress on a number of key results. After bringing the property management function of a number of sites in-house, public housing staff is developing new ways to ensure quality control in its programming. The Authority additionally formed two groups dedicated to improving customer service and providing additional support to residents through relationships with partner organizations. Staff deployed a customer satisfaction survey at the end of 2022 to Housing Choice Voucher (HCV) and public housing residents and landlords to determine a baseline for improving customer service. A streamlining of internal processes and the acquisition of new tools for communicating with residents are top priority for the organization to improve the way it does business with residents, landlords, and partner organizations.</p> <p>To improve supportive services to residents, a Partnership Improvement Team is currently putting in place a number of Memorandum of Understanding (MOUs) with community organizations. The team is prioritizing relationships with organizations who can provide emergency housing and crisis support to residents, with the end goal of increasing residents' housing stability and self-sufficiency.</p> <p>In a step towards expanding safe and affordable housing access in the county, the team finalized the closing of a \$44 million low-income housing tax credit project to rehabilitate 186 affordable housing units in the City of Wellston in March. Construction will begin in the summer of 2023 on these units initially slated for demolition. Former Wellston residents will have the first right to return. Authority staff is also working on closing a 4% tax credit deal to redevelop its Arbor Hill public housing to meet the changing needs of residents. Additionally, the development staff issued a request for proposals for project-based vouchers in new and existing developments.</p>
<p><b>B.4</b></p>	<p><b>Capital Improvements.</b> Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p>See 2022-2026 Capital Fund 5 Year Action Plan in EPIC approved by HUD on 12/21/2021.</p>

<p><b>B.5</b></p>	<p><b>Most Recent Fiscal Year Audit.</b></p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N  <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>Audit findings FY2020  Public and Indian Housing - CFDA No. 14.850</p> <p>Recommendation: The Authority should develop policies and processes to ensure that they are meeting compliance requirements for the special test: declaration of trusts.</p> <p>Action taken in response to finding: The Authority will collaborate with its General Counsel to update all declaration of trusts, as necessary.</p>
<p><b>C. Other Document and/or Certification Requirements.</b></p>	
<p><b>C.1</b></p>	<p><b>Resident Advisory Board (RAB) Comments.</b></p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
<p><b>C.2</b></p>	<p><b>Certification by State or Local Officials.</b></p> <p><a href="#">Form HUD 50077-SL</a>, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.3</b></p>	<p><b>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</b></p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
<p><b>C.4</b></p>	<p><b>Challenged Elements.</b> If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA’s response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N  <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
<p><b>C.5</b></p>	<p><b>Troubled PHA.</b></p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A  <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p><b>D. Affirmatively Furthering Fair Housing (AFFH).</b></p>	
<p><b>D.1</b></p>	<p><b>Affirmatively Furthering Fair Housing (AFFH).</b></p> <p>Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete</p>

this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

**Fair Housing Goal:**

*Describe fair housing strategies and actions to achieve the goal*

## APPLICATIONS, WAITING LIST AND TENANT SELECTION

### INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the Authority with the information needed to determine the family's eligibility. HUD requires the Authority to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, the Authority must select families from the waiting list in accordance with HUD requirements and Authority policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

The Authority is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the Authority to receive preferential treatment.

HUD regulations require that the Authority comply with all equal opportunity requirements, and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this document ensures that the Authority will be in compliance with all relevant fair housing requirements, as described in Chapter 2 of the ACOP.

## THE APPLICATION PROCESS

### OVERVIEW

This part describes the policies that guide the Authority's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the Authority's obligation to ensure the accessibility of the application process.

### APPLYING FOR ASSISTANCE

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the Authority to determine the format and content of its applications, as well as how such applications will be made available to interested families and how applications will be accepted by the Authority. However, the Authority must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the Authority's application [Notice PIH 2009-36].

#### The Authority's Policy

A two-step application process will be used by the Authority. Under their two-step application process, the Authority initially will require families to provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on the waiting list. The family will be required to provide all the information necessary to establish family eligibility and the amount of rent the family will pay when the family is selected from the waiting list.

Families may access applications online using Rent Café, an online registration and application portal. If families are unable to complete the online version of the application, they may contact the Authority's office during normal business hours to schedule an appointment to complete the application in person. Families may also request - by telephone, email, or by mail - that an application form be sent to the family via first class mail.

Completed applications must be submitted to the Authority through Rent Café, by email, mail, or dropped-off at the Authority office. Applications must be filled out completely in order to be accepted by the Authority for processing. If an application is incomplete, the Authority will notify the family of the additional information required.

### ACCESSIBILITY OF THE APPLICATION PROCESS

The Authority must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard Authority application process.

#### **Disabled Populations [24 CFR 8; PH Occ GB, p. 68]**

The Authority must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible. The facility where applications are accepted and the application process must be fully accessible, or the Authority must provide an alternate approach that provides equal access to the program. Chapter 2 of the ACOP provides a full discussion of the Authority's policies related to providing reasonable accommodations for people with disabilities.



## Attachment 1: Applications, Waiting List and Tenant Selection

### Limited English Proficiency

Public Housing Agencies (PHA) are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 of the ACOP provides a full discussion on the Authority's policies related to ensuring access to people with limited English proficiency (LEP).

### PLACEMENT ON THE WAITING LIST

The Authority must review each completed application received and make a preliminary assessment of the family's eligibility. Applicants for whom the waiting list is open must be placed on the waiting list unless the Authority determines the family to be ineligible. Where the family is determined to be ineligible, the Authority must notify the family in writing [24 CFR 960.208(a); PH Occ GB, p. 41].

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

### Ineligible for Placement on the Waiting List

#### Authority Policy

If the Authority determines from the information provided that a family is ineligible, the family will not be placed on the waiting list. When a family is determined to be ineligible, the Authority will send written notification of the ineligibility determination within 30 business days of receipt of the completed application. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14 of the ACOP).

### Eligible for Placement on the Waiting List

#### Authority Policy

The Authority will send written notification of the preliminary eligibility determination within 30 business days of receiving a completed application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify.

Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers.

The Authority will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5 of the ACOP).

Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. When the family is selected from the waiting list, the Authority will verify any preference(s) claimed and determine eligibility and suitability for admission to the program.

## MANAGING THE WAITING LIST

### OVERVIEW

The Authority must have policies regarding the type of waiting list it will utilize as well as how the waiting list will be organized and managed. This includes policies on notifying the public on the opening and closing of the waiting list to new applicants, updating family information, purging the list of families that are no longer interested in or eligible for public housing, and conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how the Authority may structure its waiting list and how families must be treated if they apply for public housing at a PHA that administers more than one assisted housing program.

### ORGANIZATION OF THE WAITING LIST

The Authority's public housing waiting list must be organized in such a manner to allow the Authority to accurately identify and select families in the proper order, according to the admissions policies described in the ACOP.

#### Authority Policy

The waiting list will contain the following information for each applicant listed:

- Names, birth dates, and social security numbers of all family members

- Unit size required (number of family members)

- Amount and source of annual income

- Mailing address, phone numbers, and email address

- Accessibility requirement, if any

- Household type (family, elderly, disabled)

- Admission preference, if any

- Race and ethnicity of the head of household

- Citizenship/eligible immigration status

The Authority will maintain one single community-wide waiting list for its developments. Within the list, the Authority will designate subparts to easily identify who should be offered the next available unit (i.e., unit size and accessible units).

The Authority will not adopt site-based waiting lists.

HUD requires that public housing applicants must be offered the opportunity to be placed on the waiting list for any tenant-based or project-based voucher or moderate rehabilitation program that the Authority operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs [24 CFR 982.205(a)(2)(i)].

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Housing Choice Voucher program, and other subsidized housing programs [24 CFR 982.205(a)(1)].

## Attachment 1: Applications, Waiting List and Tenant Selection

### Authority Policy

The Authority will not merge the public housing waiting list with the waiting list for any other program the Authority operates.

## OPENING AND CLOSING THE WAITING LIST

### Closing the Waiting List

#### Authority Policy

The Authority will close the waiting list, in whole or in part, if it has an adequate pool of families to fully lease its developments. The authority may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit.

### Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The Authority should publish a notice announcing the opening of the waiting list in local newspapers of general circulation, minority media, and other suitable media outlets. Such notice must comply with HUD fair housing requirements. The Authority should specify who may apply, and where and when applications will be received.

#### Authority Policy

The Authority will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The Authority will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

The Authority's website

St. Louis Post Dispatch

Available minority publications

## **FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]**

The Authority should conduct outreach as necessary to ensure that the Authority has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the Authority is affirmatively furthering fair housing and complying with the Fair Housing Act.

Because HUD requires the Authority to admit a specified percentage of extremely low-income families, the Authority may need to conduct special outreach to ensure that an adequate number of such families apply for public housing.

Authority outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program

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- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

Authority outreach efforts must be designed to inform qualified families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

### Authority Policy

The Authority will monitor the characteristics of the population being served and the characteristics of the population as a whole in the Authority's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

## REPORTING CHANGES IN FAMILY CIRCUMSTANCES

### Authority Policy

While the family is on the waiting list, the family must inform the Authority of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in the online Rent Café system, or by email.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

## UPDATING THE WAITING LIST

HUD requires the Authority to establish policies that describe the circumstances under which applicants will be removed from the waiting list [24 CFR 960.202(a)(2)(iv)].

### **Purging the Waiting List**

The decision to remove an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the Authority's request for information or updates because of the family member's disability, the Authority must, upon the family's request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 of the ACOP for further information regarding reasonable accommodations.

### Authority Policy

The waiting list will be updated as needed to ensure that all applicant information is current and timely.

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To update the waiting list, the Authority will send an update request via email to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last email address that the Authority has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response to the update request must be in writing and may be delivered in person by appointment, by mail, by email, by fax, or by updating family information in Rent Café. Responses should be postmarked or received by the Authority not later than 10 business days from the date of the Authority letter.

If updates to applications are made by the applicant family in Rent Café, Authority staff must review and approve the updates. Applicants will not be able to see the updated information in Rent Café until Authority staff has approved the changes. Once changes are approved, an email will be sent to the applicant informing them that the changes were approved. Authority staff will review changes in Rent Café within 10 business days.

If the family fails to respond to update requests from the Authority within 10 business days, the family will be removed from the waiting list without further notice.

If the update request is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 10 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.

When a family is removed from the waiting list during the update process for failure to respond, the Authority will contact an unresponsive applicant through all means available, which may include via mail, phone, email, and text message. The Authority will give that family a reasonable period of time to respond with their interest to not inadvertently remove an applicant who remains interested but may have moved, changed their contact information, or otherwise are difficult to reach. No informal hearing will be offered in such cases. Such failures to act on the part of the applicant prevent the Authority from making an eligibility determination; therefore, no informal hearing is required.

If a family is removed from the waiting list for failure to respond, the Authority may reinstate the family if the lack of response was due to Authority error, or to circumstances beyond the family's control, as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting from such abuse.

### **Removal from the Waiting List**

#### Authority Policy

The Authority will remove an applicant from the waiting list upon request by the applicant family. In such cases no informal hearing is required.

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If the Authority determines that the family is not eligible for admission at any time while the family is on the waiting list, the family will be removed from the waiting list.

If a family is removed from the waiting list because the Authority has determined the family is not eligible for admission, a notice will be sent to the family's email address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the Authority's decision [24 CFR 960.208(a)].

## TENANT SELECTION

### OVERVIEW

The Authority must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The Authority must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The Authority must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status, or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families will be selected from the waiting list depends on the selection method chosen by the Authority and is impacted in part by any selection preferences that the family qualifies for. The availability of units also may affect the order in which families are selected from the waiting list.

The Authority must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the Authority's selection policies [24 CFR 960.206(e)(2)]. The Authority's policies must be posted any place where the Authority receives applications. The Authority must provide a copy of its tenant selection policies upon request to any applicant or tenant. The Authority may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

#### Authority Policy

When an applicant or resident family requests a copy of the Authority's tenant selection policies, the Authority will provide copies to them free of charge.

### SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that will be used.

#### **Local Preferences [24 CFR 960.206]**

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

#### Authority Policy

The Authority will use the following local preferences:

The Authority will offer a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking who has either been referred by a partnering service agency or consortia or who is seeking an emergency transfer under VAWA from the Authority's housing choice voucher program or other covered housing program operated by the Authority.

The Authority will work with the local partnering service agencies.

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The applicant must certify that the abuser will not reside with the applicant unless the Authority gives prior written approval.

### **Income Targeting Requirement [24 CFR 960.202(b)]**

HUD requires that extremely low-income (ELI) families make up at least 40 percent of the families admitted to public housing during the Authority's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher [*Federal Register* notice 6/25/14]. To ensure this requirement is met, the Authority may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA's HCV program during a PHA fiscal year that exceed the 75 percent minimum target requirement for the voucher program, shall be credited against the PHA's basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA's housing choice voucher program during the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

#### Authority Policy

The Authority will monitor progress in meeting the ELI requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

### **Mixed Population Developments [24 CFR 960.407]**

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, cohead, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

### **Units Designated for Elderly or Disabled Families [24 CFR 945]**

The Authority may designate projects or portions of a public housing project specifically for elderly or disabled families. The Authority must have a HUD-approved allocation plan before the designation may take place.



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Among the designated developments, the Authority must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the Authority may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or cohead is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the Authority must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse affect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

### Authority Policy

The Authority does not have designated elderly or designated disabled housing at this time.

## **Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]**

The Authority's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects.

The Authority's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

### ***Steps for Implementation [24 CFR 903.2(c)(1)]***

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the Authority must comply with the following steps:

Step 1. The Authority must determine the average income of all families residing in all the Authority's covered developments. The Authority may use the median income, instead of

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average income, provided that the Authority includes a written explanation in its annual plan justifying the use of median income.

### Authority Policy

The Authority will determine the average income of all families in all covered developments on an annual basis.

Step 2. The Authority must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the Authority has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

### Authority Policy

The Authority will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The Authority must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low-income family (federal poverty level or 30 percent of median income, whichever number is higher).

Step 4. The Authority with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the Authority must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the Authority's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the Authority in consultation with the residents and the community through the annual plan process to be responsive to local needs and the Authority's strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the Authority's deconcentration policy. The Authority must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the Authority's deconcentration policy [24 CFR 903.2(c)(4)].

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If, at annual review, the average incomes at all general occupancy developments are within the EIR, the Authority will be in compliance with the deconcentration requirement, and no further action is required.

### Authority Policy

For developments outside the EIR the Authority will take the following actions to provide for deconcentration of poverty and income mixing:

The Authority will use greater flexibility in attracting households with broader ranges of incomes. The Authority will continue to reassess flat rental amounts annually to attract higher income families and will continue to offer the choice of flat rent or income-based rent to residents. Other avenues to attract higher income families being considered are:

- changes in wait list admission preferences
- more aggressive marketing of developments
- ongoing evaluation of Public Housing inventory for capital improvements.

The Authority will also continue reassessing and updating its Community Service and Self-Sufficiency Requirements (CSSR). The updates to the CSSR will offer more guidance, structure, and community service and self-sufficiency opportunities for public housing residents.

The Authority will continue establishing partnerships with other service agencies to offer more supportive services and resources to public housing residents.

### **Order of Selection [24 CFR 960.206(e)]**

The Authority system of preferences may select families either according to the date and time of application or by a random selection process.

### Authority Policy

Families will be selected from the waiting list based on selection preference(s) for which they qualify, and in accordance with the Authority's hierarchy of those preferences. Within each preference category, families will be selected in numerical order based on the numbers that were assigned to each application, by lottery, at the time the applications were placed on the waiting list.

When selecting applicants from the waiting list, the Authority will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The Authority will offer the unit to the highest-ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with a higher placement based on application number and/or higher preference status.

Factors such as deconcentration or income mixing, and income targeting will also be considered in accordance with HUD requirements and Authority policy.

## NOTIFICATION OF SELECTION

When the family has been selected from the waiting list, the Authority must notify the family [24 CFR 960.208].

### Authority Policy

Families selected from the waiting list are required to complete an intake application process. An electronic version of the intake paperwork replaces the need for an in-person interview. However, if an applicant is unable to complete the electronic application, or requests an in-person interview, the Authority will schedule an appointment.

The Authority will notify the family by email and first-class mail when it is selected from the waiting list. The notice will inform the family of their selection from the waiting list and will provide instructions for completing the intake process. A copy of the electronic intake paperwork will be sent to the applicant's email address for completion. Authority staff will be available to assist applicants with the intake paperwork via phone, email, or in-person appointment. Required verification documents will be requested, and applicants will sign all required intake forms electronically, if possible.

All adult household members will be required to supply required documentation, and to electronically sign all required intake forms. If an in-person interview is scheduled, all adult family members are required to attend.

If a notification letter is returned to the Authority with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the Authority from making an eligibility determination; therefore, no informal hearing will be offered.

## THE APPLICATION INTERVIEW

HUD recommends that the Authority obtain the information and documentation needed to make an eligibility determination through a private interview. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the Authority determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period determined by the Authority [Notice PIH 2018-24].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

### Authority Policy

Pending disclosure and documentation of social security cards, the Authority will allow the family to retain its place on the waiting list for 30 days. If not, all household members have disclosed their social security cards at the next time a unit becomes available, the Authority will offer a unit to the next eligible applicant family on the waiting list.

If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7 of the ACOP). If

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the family is verified as eligible for the preference, the Authority will proceed with the intake application process. If the Authority determines the family is not eligible for the preference, the intake application will not be made available, and the family will be placed back on the waiting list according to the date and time of their application.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the Authority will send an email providing the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide in the initial intake application must be provided within 5 business days of the interview (Chapter 7 of the ACOP provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the intake application process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the Authority will provide translation services in accordance with the Authority's LEP plan.

### **FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]**

The Authority must verify all information provided by the family. Based on verified information related to the eligibility requirements, including suitability standards, the Authority must make a final determination of eligibility.

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

#### Authority Policy

The Authority will notify a family in writing of their eligibility via email within 15 business days of the determination and will provide the approximate date of occupancy insofar as that date can be reasonably determined.

The Authority will expedite the administrative process for determining eligibility to the extent possible for applicants who are admitted to the public housing program because of an emergency transfer from another Authority program.

The Authority must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

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### Authority Policy

If the Authority determines that the family is ineligible, the Authority will send written notification via email of the ineligibility determination within 15 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal hearing.

If the Authority uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the Authority can move to deny the application. See Section 3-III.G for the Authority's policy regarding such circumstances.

The Authority must provide the family a notice of VAWA rights (form HUD-5380) as well as the HUD VAWA self-certification form (form HUD-5382) in accordance with the Violence against Women Act, and as outlined in 16-VII.C, at the time the applicant is provided assistance or at the time the applicant is denied assistance. This notice must be provided in both of the following instances: (1) when a family actually begins receiving assistance (lease execution); or (2) when a family is notified of its ineligibility.

## OPERATION AND MANAGEMENT: INSPECTIONS

### TYPES OF INSPECTIONS

**Move-In Inspections.** Leases require the Authority and the family to inspect the residence prior to occupancy to determine the condition of the unit and the equipment therein. The Authority will provide a copy of this initial signed inspection to the family and retain a copy in the resident's file.

Any adult family member may attend the initial inspection and sign the inspection form on behalf of the head of household.

**Move-Out Inspections.** The Authority will inspect the residence at the time the resident vacates it and will allow the residents to participate in the inspection, if they wish, unless they vacate without notice. The Authority will provide to the resident a statement of any costs incurred for maintenance and damage beyond normal wear and tear.

The difference between the condition of the unit at move-in and move-out serves as the basis for any charges against the resident's security deposit if the required work exceeds that for normal wear and tear.

When applicable, the Authority will provide the resident with a statement of charges for maintenance and damage beyond normal wear and tear, within ten business days of conducting the move-out inspection.

**Annual Inspections.** The Authority will inspect all occupied dwellings annually using HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE).

**Special Inspections.** The Authority may conduct a special inspection for concerns in any of the following areas:

- housekeeping,
- unit condition,
- suspected lease violation,
- preventive maintenance,
- routine maintenance, or
- there is reasonable cause to believe an emergency exists.

### NOTICE AND SCHEDULING OF INSPECTIONS

**Non-emergency Entries.** The Authority will notify the resident in writing at least 48 hours prior to any non-emergency inspection.

The Authority will notify residents in writing at least one week prior to a regular annual inspection. This will allow the family time to prepare the unit for the inspection.

Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the Authority to enter the unit.

**Emergency Entries.** The Authority may enter the dwelling at any time without advance notice when there is reasonable cause to believe that an emergency exists. If no adult household

## Attachment 2: Operation and Management

member is present at the time of an emergency entry, Authority staff will leave a written statement with the date, time, and purpose of the entry prior to leaving the unit.

**Scheduling of Inspections.** The Authority will conduct Inspections during business hours. If a family needs to reschedule an inspection, they must notify the Authority at least 24 hours prior to the scheduled inspection. The Authority will reschedule the inspection no more than once, unless the resident has a verifiable good cause to delay the inspection. The Authority may request verification of such cause.

**Attendance at Inspections.** The Authority does not require the resident to be present for any inspection except the move-in inspection. However, the resident may choose to attend any inspection if they desire.

### INSPECTION RESULTS

**Emergency Repairs.** When the Authority deems conditions in the unit to be hazardous to residents' health or safety, it will make repairs or otherwise abate the situation within 24 hours. Circumstances potentially hazardous to health or safety include but are not limited to the following.

- Any condition that jeopardizes the security of the unit.
- Major plumbing leaks or flooding.
- A waterlogged ceiling or floor in imminent danger of falling.
- Natural, liquified petroleum gas, or fuel oil leaks.
- Any electrical condition that could result in shock or fire.
- Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit.
- Utilities not in service, including no running hot water.
- Conditions that present the imminent possibility of injury.
- Obstacles that prevent safe entrance or exit from the unit.
- Absence of a functioning toilet.
- Inoperable smoke detectors.

**Non-emergency Repairs.** The Authority will correct non-life-threatening health and safety defects within ten business days of the inspection date. If the Authority is unable to make repairs within that period due to circumstances beyond its control (e.g., required parts or services are unavailable, weather conditions, etc.) the Authority will notify the family of an estimated date of completion.

The family must allow the Authority access to the residence to make repairs.

**Resident-caused Damages.** The Authority will bill the resident for damages to the unit beyond normal wear and tear, in accordance with the Authority's Admissions and Continued Occupancy Policy (ACOP), Section 8-I.F., Maintenance and Damage Charges. The Authority will consider repeated or excessive damages to the unit beyond normal wear and tear a serious or repeated violation of the lease.



## Attachment 2: Operation and Management

**Housekeeping.** Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, the Authority will provide proper notice of a lease violation.

The Authority will perform a reinspection within 30 days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the problem or allow for a reinspection is considered a violation of the lease and may result in termination of tenancy in accordance with the ACOP (Chapter 13).

The Authority will also issue notices of lease violation to residents who purposely disengage the unit's smoke detector. The Authority will provide one warning; a second incidence will result in lease termination.

## GRIEVANCE PROCEDURES FOR PUBLIC HOUSING RESIDENTS

### REQUIREMENTS

The Authority must have a grievance procedure in place through which residents of public housing are provided an opportunity to grieve any Authority action or failure to act involving the lease or Authority policies which adversely affect their rights, duties, welfare, or status. The Authority must not only meet the minimal procedural due process requirements provided under the regulations but must also meet any additional requirements imposed by local, state, or federal law.

The Authority grievance procedure must be included in, or incorporated by reference in, the lease.

#### Authority Policy

The Authority grievance procedure will be incorporated by reference in the tenant lease.

The Authority must provide at least 30 days' notice to tenants and resident organizations setting forth proposed changes in the Authority's grievance procedure and provide an opportunity to present written comments. Comments submitted must be considered by the Authority before adoption of any changes to the grievance procedure by the Authority.

#### Authority Policy

Residents and resident organizations will have thirty calendar days from the date they are notified by the Authority of any proposed changes in the Authority's grievance procedure, to submit written comments to the Authority.

The Authority must furnish a copy of the grievance procedure to each tenant and to resident organizations.

### DEFINITIONS

There are several terms used by HUD regarding public housing grievance procedures, which take on specific meanings different from their common usage. These terms are as follows:

- **Grievance** - any dispute which a tenant may have with respect to Authority action or failure to act in accordance with the individual tenant's lease or Authority regulations which adversely affect the individual tenant's rights, duties, welfare or status
- **Complainant** - any tenant whose grievance is presented to the Authority or at the project management office
- **Due Process Determination** - a determination by HUD that law of the jurisdiction requires that the tenant must be given the opportunity for a hearing in court which provides the basic elements of due process before eviction from the dwelling unit
- **Expedited Grievance** - a procedure established by the Authority for any grievance or termination that involves:
  - Any criminal activity that threatens the health, safety, or right to peaceful enjoyment or the Authority's public housing premises by other residents or employees of the Authority; or

### Attachment 3: Grievance Procedures

- Any drug-related criminal activity on or off the premises
- **Elements of Due Process** - an eviction action or a termination of tenancy in a state or local court in which the following procedural safeguards are required:
  - Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
  - Right of the tenant to be represented by counsel
  - Opportunity for the tenant to refute the evidence presented by the Authority including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the tenant may have
  - A decision on the merits
- **Hearing Officer** - an impartial person selected by the Authority, other than the person who made or approved the decision under review, or a subordinate of that person. The individual or individuals do not need legal training.
- **Tenant** - the adult person (or persons) (other than a live-in aide)
  - Who resides in the unit, and who executed the lease with the Authority as lessee of the dwelling unit, or, if no such person now resides in the unit,
  - Who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit
- **Resident Organization** - includes a resident management corporation

### APPLICABILITY

Grievances could potentially address most aspects of the Authority's operation. However, there are some situations for which the grievance procedure is not applicable.

The grievance procedure is applicable only to individual tenant issues relating to the Authority. It is not applicable to disputes between tenants not involving the Authority. Class grievances are not subject to the grievance procedure and the grievance procedure is not to be used as a forum for initiating or negotiating policy changes of the Authority.

If HUD has issued a due process determination, a Public Housing Agency (PHA) may exclude from its grievance procedure any grievance concerning a termination of tenancy or eviction that involves:

- Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of the PHA
- Any violent or drug-related criminal activity on or off such premises
- Any criminal activity that resulted in felony conviction of a household member

In states without due process determinations, PHAs must grant opportunity for grievance hearings for all lease terminations, regardless of cause, with the following exception: PHAs may use expedited grievance procedures for the excluded categories listed above. These expedited grievance procedures are described in Section 14-III.E. below.

### Attachment 3: Grievance Procedures

If HUD has issued a due process determination, the PHA may evict through the state/local judicial eviction procedures. In this case, the PHA is not required to provide the opportunity for a hearing under the PHA's grievance procedure as described above.

#### Authority Policy

The Authority is in a HUD-declared due process state. Therefore, the Authority will not offer grievance hearings for lease terminations involving criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the Authority, for violent or drug-related criminal activity on or off the premises, or for any criminal activity that resulted in felony conviction of a household member.

See Chapter 13 of the ACOP for related policies on the content of termination notices.

### **INFORMAL SETTLEMENT OF GRIEVANCE [24 CFR 966.54]**

HUD regulations state that any grievance must be personally presented, either orally or in writing, to the Authority office or to the office of the housing development in which the complainant resides so that the grievance may be discussed informally and settled without a hearing.

#### Authority Policy

The Authority will accept requests for an informal settlement of a grievance either orally or in writing (including emailed requests), to the Authority office within ten business days of the grievable event. Within ten business days of receipt of the request the Authority will arrange a meeting with the tenant at a mutually agreeable time and confirm such a meeting in writing to the tenant. The informal settlement may be conducted remotely as required by the Authority or may be conducted remotely upon consideration of the request of the tenant. See 14-III.G for information on how and under what circumstances remote informal settlements may be conducted.

If a tenant fails to attend the scheduled meeting without prior notice, the Authority will reschedule the appointment only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

HUD regulations require that a summary of such discussion be prepared within a reasonable time and one copy will be given to the tenant and one retained in the Authority's tenant file.

The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore and will specify the procedures by which a hearing may be obtained if the complainant is not satisfied.

#### Authority Policy

The Authority will prepare a summary of the informal settlement within five business days; one copy to be given to the tenant and one copy to be retained in the Authority's tenant file.

Attachment 3: Grievance Procedures  
**PROCEDURES TO OBTAIN A HEARING**

**Requests for Hearing and Failure to Request**

Authority Policy

The resident must submit a written request (including emailed requests) for a grievance hearing to the Authority within five business days of the tenant's receipt of the summary of the informal settlement.

If the complainant does not request a hearing, the Authority's disposition of the grievance under the informal settlement process will become final. However, failure to request a hearing does not constitute a waiver by the complainant of the right to contest the Authority's action in disposing of the complaint in an appropriate judicial proceeding.

**Scheduling of Hearings**

If the complainant has complied with all requirements for requesting a hearing as described above, a hearing must be scheduled by the hearing officer promptly for a time and place reasonably convenient to both the complainant and the Authority. A written notification specifying the time, place and the procedures governing the hearing must be delivered to the complainant and the appropriate Authority official.

Authority Policy

Within ten business days of receiving a written request for a hearing, the hearing officer will schedule and send written notice of the hearing to both the complainant and the Authority.

The hearing will be conducted remotely, and at the time the notice is sent to the family, the family will be notified:

Regarding the processes involved in a remote grievance hearing

That the Authority will provide technical assistance prior to and during the hearing, if needed

That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the Authority and the Authority will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate

The Authority may wish to permit the tenant to request to reschedule a hearing for good cause.

Authority Policy

The tenant may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the Authority may request documentation of the "good cause" prior to rescheduling the hearing.

Attachment 3: Grievance Procedures  
**Expedited Grievance Procedure**

The Authority may establish an expedited grievance procedure for any grievance concerning a termination of tenancy or eviction that involves:

- Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or employees of the Authority
- Any drug-related criminal activity on or near such premises
- Any criminal activity that resulted in felony conviction of a household member

In such expedited grievances, the informal settlement of grievances as discussed in 14-III.D is not applicable.

The Authority may adopt special procedures concerning expedited hearings, including provisions for expedited notice or scheduling, or provisions for expedited decision on the grievance.

Authority Policy

The Authority will not offer expedited grievance procedures.

**SELECTION OF HEARING OFFICER [24 CFR 966.53(e)]**

The grievance hearing must be conducted by an impartial person or persons appointed by the Authority, other than the person who made or approved the Authority action under review, or a subordinate of such person. The Authority must describe their policies for selection of a hearing officer in their lease.

Authority Policy

Authority grievance hearings will be conducted by a single hearing officer and not a panel.

The Authority will appoint a staff member who was not involved in the decision under appeal. If a designated staff member (such as the program manager) was involved in the decision, or is a subordinate of such person, an alternate hearing officer will be selected.

The Authority may select designated staff members who were not involved in the decision under appeal in certain circumstances, such as appeals involving discrimination claims or denials of requests for reasonable accommodations.

PHAs must describe their policies for selection of a hearing officer in their lease forms. Changes to the public housing lease are subject to a 30-day comment period [24 CFR 966.4].

**REMOTE HEARINGS [Notice PIH 2020-32]**

There is no requirement that grievance hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their grievance hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote grievance hearings, applicants may still request an in-person hearing, as applicable.

## Attachment 3: Grievance Procedures

### Authority Policy

The Authority has the sole discretion to require that hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.

The Authority will conduct all informal hearings remotely, unless upon request of the applicant as a reasonable accommodation, an applicant requires an in-person informal hearing. The Authority will consider other reasonable requests for an in-person informal hearing on a case-by-case basis.

### **Discovery of Documents Before the Remote Hearing**

#### Authority Policy

If the hearing will be conducted remotely, the Authority will compile a hearing packet, consisting of all documents the Authority intends to produce at the hearing. The Authority will mail copies of the hearing packet to the tenant, the tenant's representatives, if any, and the hearing officer at least three days before the scheduled remote hearing. The original hearing packet will be in the possession of the Authority representative and retained by the Authority.

If the hearing is to be conducted remotely, the Authority will require the resident to provide any documents directly relevant to the hearing at least 24 hours before the scheduled hearing through the mail, via email, or text. The Authority will scan and email copies of these documents to the hearing officer and the Authority representative the same day they are received.

Documents will be shared electronically whenever possible.

### **Ensuring Accessibility for Persons with Disabilities and LEP Individuals**

As with in-person grievance hearings, the platform for conducting remote grievance hearings must be accessible to persons with disabilities and the grievance hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. The Authority may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote grievance hearings.

If no method of conducting a remote grievance hearing is available that appropriately accommodates an individual's disability, the Authority may not hold against the individual his or her inability to participate in the remote grievance hearing, and the Authority should consider whether postponing the remote hearing to a later date is appropriate or whether there is a suitable alternative.

Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation will depend on the specific circumstances and requirements.

### Attachment 3: Grievance Procedures

As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote grievance hearings, including the use of interpretation services and document translation. See Chapter 2 of the ACOP for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote grievance hearings.

#### **Conducting Hearings Remotely**

The Authority must ensure that the lack of technology or inability to use technology for remote grievance hearings does not pose a disadvantage to families that may not be apparent to the Authority. The Authority should determine through a survey or other means if these barriers exist prior to conducting the remote grievance hearing and, if the family does not have the proper technology to fully participate, either postpone the hearing or provide an alternative means of access.

As with in-person grievance hearings, the Authority must provide all materials presented, whether paper or electronic, to the family prior to the remote grievance hearing. The family must also be provided with an accessible means by which to transmit their own evidence.

The Authority's essential responsibility is to ensure grievance hearings meet the requirements of due process and comply with HUD regulations. Therefore, all Authority policies and processes for remote grievance hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations at 24 CFR 966.56 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.

#### Authority Policy

The Authority will conduct remote grievance hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, participants are unable to adequately access the video conferencing platform at any point, or upon request, the grievance hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote grievance hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.

At least five business days prior to scheduling the remote hearing, the Authority and Hearing Officer will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the Authority of any known barriers. The Authority will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.

The Authority will follow up with a phone call and/or email to the family at least one business day prior to the remote grievance hearing to ensure that the family received all information and is comfortable accessing the video conferencing or call-in platform.

The Authority will ensure that all electronic information stored or transmitted with respect to the grievance hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.



Attachment 3: Grievance Procedures  
**PROCEDURES GOVERNING THE HEARING [24 CFR 966.56]**

**Rights of Complainant**

The complainant will be afforded a fair hearing. This includes:

- The opportunity to examine before the grievance hearing any Authority documents, including records and regulations that are directly relevant to the hearing. The tenant must be allowed to copy any such document at the tenant's expense. If the Authority does not make the document available for examination upon request by the complainant, the Authority may not rely on such document at the grievance hearing.

Authority Policy

The tenant will be allowed to copy any documents related to the hearing at no cost to the family. There will be no charge for documents emailed by the Authority. The family must request discovery of Authority documents no later than 12:00 p.m. on the business day prior to the hearing.

If the tenant needs to make copies of documents on-site, the Authority staff will schedule an appointment. Authority staff will be present at the time the tenant makes necessary copies of documentation to ensure there are no violations of privacy regarding tenant files.

- The right to be represented by counsel or another person chosen to represent the tenant, and to have such person make statements on the tenant's behalf.

Authority Policy

Hearings may be attended by the following applicable persons:

The Authority representatives and any witnesses for the Authority

The tenant and any witnesses for the tenant

The tenant's counsel or other representative

Any other person approved by the Authority as a reasonable accommodation for a person with a disability

- The right to a private hearing unless the complainant requests a public hearing.
- The right to present evidence and arguments in support of the tenant's complaint, to controvert evidence relied on by the Authority or project management, and to confront and cross-examine all witnesses upon whose testimony or information the Authority or project management relies.
- A decision based solely and exclusively upon the facts presented at the hearing.

**Failure to Appear**

If the complainant or the Authority fails to appear at a scheduled hearing, the hearing officer may decide to postpone the hearing for no more than five business days or may decide that the party has waived his/her right to a hearing. Both the complainant and the Authority must be notified of the determination by the hearing officer: Provided, that a determination that the complainant has waived his/her right to a hearing will not constitute a waiver of any right the complainant may have to contest the Authority's disposition of the grievance in an appropriate judicial proceeding.

### Attachment 3: Grievance Procedures

There may be times when a complainant does not appear due to unforeseen circumstances which are out of their control and are no fault of their own.

#### Authority Policy

If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 15 minutes. If the tenant appears within 15 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 15 minutes of the scheduled time, they will be considered to have failed to appear.

If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the Authority within 24 hours of the scheduled hearing date, excluding weekends and holidays. The hearing officer will reschedule the hearing only if the tenant can show good cause for the failure to appear, or it is needed as a reasonable accommodation for a person with disabilities.

"Good cause" is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

#### **General Procedures**

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the Authority must sustain the burden of justifying the Authority action or failure to act against which the complaint is directed [24 CFR 966.56(d)].

The hearing is conducted informally by the hearing officer. The Authority and the tenant must be given the opportunity to present oral or documentary evidence pertinent to the facts and issues raised by the complaint, and to question any witnesses.

#### Authority Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

**Oral evidence:** the testimony of witnesses

**Documentary evidence:** a writing which is relevant to the case, for example, a letter written to the Authority. Writings include all forms of recorded communication or representation, including letters, emails, words, pictures, sounds, videotapes, symbols, or combinations thereof.

**Demonstrative evidence:** Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

**Real evidence:** A tangible item relating directly to the case.

*Hearsay Evidence* is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.

### Attachment 3: Grievance Procedures

If the Authority fails to comply with the discovery requirements (providing the tenant with the opportunity to examine Authority documents prior to the grievance hearing), the hearing officer will refuse to admit such evidence.

Other than the failure of the Authority to comply with discovery requirements, the hearing officer has the authority to overrule any objections to evidence.

The complainant or the Authority may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript [24 CFR 966.56(e)].

#### Authority Policy

If the complainant would like the Authority to record the proceedings by audiotape, the request must be made to the Authority by 12:00 p.m. on the business day prior to the hearing.

The Authority will consider that an audio tape recording of the proceedings is a transcript.

### **Accommodations of Persons with Disabilities**

The Authority must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

If the tenant is visually impaired, any notice to the tenant which is required in the grievance process must be in an accessible format.

See Chapter 2 of the ACOP for a thorough discussion of the Authority's responsibilities pertaining to reasonable accommodation.

### **Limited English Proficiency**

The Authority must comply with HUD's LEP Final Rule in providing language services throughout the grievance process.

### **DECISION OF THE HEARING OFFICER**

The hearing officer must issue a written decision, stating the reasons for the decision, within a reasonable time after the hearing. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the decision must be sent to the complainant and the Authority. The Authority must retain a copy of the decision in the tenant's folder. A log of all hearing officer decisions must also be maintained by the Authority and made available for inspection by a prospective complainant, his/her representative, or the hearing officer [24 CFR 966.57(a)].

#### Authority Policy

In rendering a decision, the hearing officer will consider the following matters:

**Authority Notice to the Family:** The hearing officer will determine if the reasons for the Authority's decision are factually stated in the notice.

**Discovery:** The hearing officer will determine if the family was given the opportunity to examine any relevant documents in accordance with Authority policy.

### Attachment 3: Grievance Procedures

**Authority Evidence to Support the Authority Decision:** The evidence consists of the facts presented. Evidence is not conclusion, and it is not argument. The hearing officer will evaluate the facts to determine if they support the Authority's conclusion.

**Validity of Grounds for Termination of Tenancy (when applicable):** The hearing officer will determine if the termination of tenancy is for one of the grounds specified in the HUD regulations and Authority policies. If the grounds for termination are not specified in the regulations or in compliance with Authority policies, then the decision of the Authority will be overturned.

The hearing officer will issue a written decision to the family and the Authority no later than ten business days after the hearing. The report will contain the following information:

**Hearing information:**

- Name of the complainant
- Date, time, and place of the hearing
- Name of the hearing officer
- Name of the Authority representatives
- Name of family representative (if any)
- Names of witnesses (if any)

**Background:** A brief, impartial statement of the reason for the hearing and the date(s) on which the informal settlement was held, who held it, and a summary of the results of the informal settlement. Also includes the date the complainant requested the grievance hearing.

**Summary of the Evidence:** The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

**Findings of Fact:** The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

**Conclusions:** The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the Authority's decision.

**Order:** The hearing report will include a statement of whether the Authority's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the Authority to change the decision in accordance with the hearing officer's determination. In the case of termination of tenancy, the hearing officer will instruct the Authority to restore the family's status.

Attachment 3: Grievance Procedures  
**Procedures for Further Hearing**

Authority Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing to reschedule it at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the Authority will take effect and another hearing will not be granted.

**Final Decision**

The decision of the hearing officer is binding on the Authority which must take the action, or refrain from taking the action cited in the decision unless the Authority's Board of Commissioners determines within a reasonable time, and notifies the complainant that:

- The grievance does not concern Authority action or failure to act in accordance with or involving the complainant's lease on Authority policies which adversely affect the complainant's rights, duties, welfare, or status; or
- The decision of the hearing officer is contrary to federal, state, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the Authority

Authority Policy

When the Authority considers the decision of the hearing officer to be invalid due to the reasons stated above, it will present the matter to the Authority Board of Commissioners within ten business days of the date of the hearing officer's decision. The Board has thirty calendar days to consider the decision. If the Board decides to reverse the hearing officer's decision, it must notify the complainant within ten business days of this decision.

A decision by the hearing officer or Board of Commissioners in favor of the Authority or which denies the relief requested by the complainant in whole or in part must not constitute a waiver of any rights, nor effect in any manner whatever, any rights the complainant may have to a subsequent trial or judicial review in court [24 CFR 966.57(c)].

## PRIORITY PARTNERSHIP FRAMEWORK

### OVERVIEW

In addition to running the Family Self-Sufficiency (FSS) program for Housing Choice Voucher (HCV) recipients, the Authority has expanded that model to extend supportive services to all its residents. The Priority Partnership Framework is largely based on the FSS model of partnering with community organizations in order to provide services to increase residents' ability to build and maintain self-sufficiency. This model prioritizes the establishment of services in levels, beginning with the most critical: emergency housing and crisis support. Once the team has established relationships with organizations in this level, staff will pursue agreements with childcare and family support, workforce development and job training, and education and financial literacy organizations. These partnerships are being formalized through Memorandum of Understanding (MOUs) with community partners.

# Priority Partnership Framework

Housing Authority of St. Louis County



### Level 1 Services:

- Crisis support
- Domestic violence support
- Emergency housing
- Energy and utility assistance
- Food resources
- Legal services
- Mental health support
- Natural disaster assistance
- Physical health support
- Security deposit assistance

### Level 2 Services:

- Broadband services
- Daycare
- Holiday support
- Newborn and post-partum support
- Parenting training and support
- Transportation

### Level 3 Services:

- Assisting youth with career skills
- Connecting job seekers to training programs
- Job training
- Scholarship programs

### Level 4 Services:

- Debt counseling
- Financial literacy and planning
- Homeownership education
- Tenants' rights training

### Level 5 Services:

- Home repair services
- Senior and disability services
- Wealth-building training

## COMMUNITY SERVICE AND SELF-SUFFICIENCY POLICY

### Background

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes, or other activities that help an individual toward self-sufficiency and economic independence. This is a requirement of the public housing lease.

### Definitions

**Community Service** - community service activities include, but are not limited to, work at:

- Local public or nonprofit institutions such as schools, head start programs, before or after school programs, childcare centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing)
- Nonprofit organizations serving Authority residents or their children such as: Boy or Girl Scouts, Boys or Girls Club, 4-H clubs, Police Assistance League (PAL), organized children's recreation, mentoring or education programs, Big Brothers or Big Sisters, garden centers, community clean-up programs, beautification programs
- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels
- Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods, or performing arts
- Authority housing to improve grounds or provide gardens (so long as such work does not alter the Authority's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board
- Care for the children of other residents so parent may volunteer

**Note:** Political activity is excluded.

**Self-Sufficiency Activities** - self-sufficiency activities include, but are not limited to:

- Job readiness or job training
- Training programs through local one-stop career centers, workforce investment boards (local entities administered through the U.S. Department of Labor), or other training providers
- Employment counseling, work placement, or basic skills training
- Education, including higher education (junior college or college), or reading, financial, or computer literacy classes
- Apprenticeships (formal or informal)



## Attachment 5: Community Service and Self-Sufficiency Policy

- English proficiency or English as a second language classes
- Budgeting and credit counseling
- Any other program necessary to ready a participant to work (such as substance abuse or mental health counseling)

**Exempt Adult** - an adult member of the family who meets any of the following criteria:

- Is 62 years of age or older
- Is blind or a person with disabilities (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability he or she is unable to comply with the service provisions, or is the primary caretaker of such an individual
- Is engaged in *work activities*
- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of Missouri, including a state-administered welfare-to-work program; or
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of Missouri, including a state-administered welfare-to-work program and the supplemental nutrition assistance program (SNAP), and has not been found by the state or other administering entity to be in non-compliance with such program

Public Housing Agencies (PHA) can use reasonable guidelines in clarifying the work activities in coordination with TANF, as appropriate.

**Work Activities** mean it relates to an exemption from the community service requirement, *work activities* means:

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training (not to exceed 12 months with respect to any individual)
- Job skills training directly related to employment
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate

## Attachment 5: Community Service and Self-Sufficiency Policy

- Provision of childcare services to an individual who is participating in a community service program

### Requirements of the Program

1. The eight (8) hours per month may be either volunteer work or self-sufficiency program activity, or a combination of the two.
2. At least eight (8) hours of activity must be performed each month or may be aggregated across a year. Any blocking of hours is acceptable as long as long as 96 hours is completed by each annual certification of compliance.
3. Family obligation:
  - At lease execution, all adult members (18 or older) of a public housing resident family must:
    - Sign a certification that they have received and read this policy and understand that if they are not exempt, failure to comply with the community service requirement will result in a nonrenewal of their lease; and
    - Declare if they are exempt. If exempt, they must complete the Exemption Form and provide documentation of the exemption.
  - Upon written notice from the Authority, non-exempt family members must present complete documentation of activities performed during the applicable lease term. This documentation will include places for signatures of supervisors, instructors, or counselors, certifying the number of hours.
  - If a family member is found to be non-compliant at the end of the 12-month lease term, he or she, and the head of household, will be required to sign an agreement with the housing authority to make up the deficient hours over the next twelve (12) month period, or the lease will be terminated.
  - At annual reexamination, the family must also sign a certification certifying that they understand the community service requirement.
4. Change in exempt status:
  - If, during the twelve (12) month lease period, a non-exempt person becomes exempt, it is his or her responsibility to report this to the Authority and provide documentation of exempt status.
  - If, during the twelve (12) month lease period, an exempt person becomes non-exempt, it is their responsibility to report this to the Authority. Upon receipt of this information the Authority will provide the person with the appropriate documentation form(s) and a list of agencies in the community that provide volunteer and/or training opportunities.

### Authority Obligation

1. To the greatest extent possible and practicable, the Authority will:
  - Provide names and contacts at agencies that can provide opportunities for residents, including residents with disabilities, to fulfill their community service obligations.

## Attachment 5: Community Service and Self-Sufficiency Policy

- Provide in-house opportunities for volunteer work or self-sufficiency activities.
2. The Authority will provide the family with a copy of this policy, and all applicable exemption verification forms and community service documentation forms, at lease-up, lease renewal, when a family member becomes subject to the community service requirement during the lease term, and at any time upon the family's request.
  3. Although exempt family members will be required to submit documentation to support their exemption, the Authority will verify the exemption status in accordance with its verification policies. The Authority will make the final determination as to whether or not a family member is exempt from the community service requirement. Residents may use the Authority's grievance procedure if they disagree with the Authority's determination.
  4. Non-compliance of family member:
    - At least thirty (30) days prior to the end of the 12-month lease term, the Authority will begin reviewing the exempt or non-exempt status and compliance of family members;
    - If, at the end of the initial 12-month lease term under which a family member is subject to the community service requirement, the Authority finds the family member to be non-compliant, the Authority will not renew the lease unless:
      - The head of household and any other non-compliant resident enter into a written agreement with the Authority, to make up the deficient hours over the next twelve (12) month period; or
      - The family provides written documentation satisfactory to the Authority that the non-compliant family member no longer resides in the unit.
    - If, at the end of the next 12-month lease term, the family member is still not compliant, a 30-day notice to terminate the lease will be issued and the entire family will have to vacate, unless the family provides written documentation satisfactory to the Authority that the non-compliant family member no longer resides in the unit;
    - The family may use the Authority's grievance procedure to dispute the lease termination.

**Certifications of Compliance with  
PHA Plan and Related Regulations  
(Small PHAs)**

**U.S. Department of Housing and Urban Development**  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 3/31/2024

**PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations  
including PHA Plan Elements that Have Changed**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the      5-Year and/or   X   Annual PHA Plan, hereinafter referred to as "the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning      01/2024 in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice (AI) or Assessment of Fair Housing (AFH) as applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR § 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA certifies that the following policies, programs, and plan components have been revised since submission of its last

Annual PHA Plan (check all policies, programs, and components that have been changed):

- 903.7a Housing Needs
- 903.7b Deconcentration and Other Policies Governing Eligibility, Selection, Occupancy, and Admissions Policies
- 903.7c Financial Resources
- 903.7d Rent Determination Policies
- 903.7h Demolition and Disposition
- 903.7k Homeownership Programs
- 903.7r Additional Information
  - A. Progress in meeting 5-year mission and goals
  - B. Criteria for substantial deviation and significant amendments
  - C. Other information requested by HUD
    - 1. Resident Advisory Board consultation process
    - 2. Membership of Resident Advisory Board
    - 3. Resident membership on PHA governing board

The PHA provides assurance as part of this certification that:

- (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
  6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of

the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.

7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For a PHA Plan that includes a policy for site-based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting lists would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing; and
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 24 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Housing Authority of the City of Olivette  
PHA Name

MO-132  
PHA Number/HA Code

5 -Year PHA Plan for Fiscal Years 2023 - 2028

Annual PHA Plan for Fiscal Year 2024

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Executive Director and CEO:		Name of Board Chairman:	
Shannon Koenig		Nikeyia Ingram	
Signature	Date	Signature	Date

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

## Memorandum



**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director and CEO

**From:** Anna Holyan, Director of Strategic Initiatives

**Date:** August 22, 2023

**Subject:** *Agency Performance Report*

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This memo provides an overview of the Agency Performance Report. This report is designed to communicate how the agency is performing by U.S. Housing and Urban Development (HUD) standards and by the internal measures the organization uses to track its own performance. This update is provided on a quarterly basis.

**I. Progress Since Last Quarter**

Since the second quarter, the Authority received information on its overall PHAS scores, as well as Olivette's specific scores. An outline of changes in PHAS and key results from the second quarter is below.

**A. PHAS Scores**

We measure whether we are on track to receive our target score by monitoring the points received through the PHAS subsystem indicators. Pending HUD final approval, the Olivette Housing Authority scored as a High Performer in 2022 and will likely score as a High Performer for 2023.

**B. Key Result: Formally Establish 3-5 Level 1 Partnerships**

Since the last quarter, staff have been meeting with community organizations to formalize partnerships to provide supportive services to residents. To date, formal agreements are in place or in progress with Community Action Agency of St. Louis County, Heat Up/Cool Down St. Louis, St. Louis County Weinman Domestic Violence Shelter, Urban League, and YWCA St. Louis.

**C. Key Result: Successful Implementation of PBV RFP**

We drafted and issued an RFP for project-based vouchers in July. Staff received six submissions and will make awards soon.

**II. Attachments**

Agency Performance Report, Third Quarter

# AGENCY PERFORMANCE REPORT

Housing Authority of the City of Olivette  
Third Quarter, 2023

Service  
Respect  
Integrity  
Excellence  
Collaboration

## WHAT HUD MEASURES

### PHAS SCORES

HUD assesses the health of a PHA's **Public Housing program** through an indicator called the Public Housing Assessment System, or PHAS.

#### Why it matters

The Housing Authority's PHAS score communicates how well the agency is performing, impacts the amount of HUD funding it receives for the fiscal year, and determines the frequency of HUD public housing inspections.

#### Most Recent Result in 2022



High Performer: 90%

#### Anticipated 2023 Score



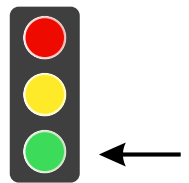
High Performer: 90%+

#### Target for 2024



High Performer: 90%+

#### On Track for 2023?



## WHAT THE AUTHORITY MEASURES

**Objective 1:** Deliver services safely, effectively, and efficiently.

#### RESULTS



**Objective 2:** Ensure residents, landlords, and employees feel respected during interactions with the Authority.

#### RESULTS

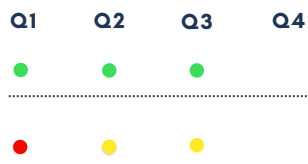
- ▶ Active implementation of deliverables by Customer Service Improvement Team
- ▶ Increase customer satisfaction



**Objective 3:** Help our residents and families gain self-sufficiency through partnerships with other organizations in the community.

#### RESULTS

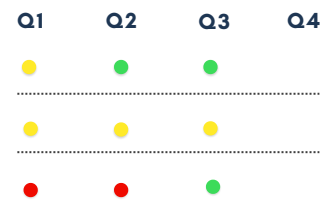
- ▶ Active implementation of deliverables by Partnership Improvement Team
- ▶ Formally establish 3-5 Level 1 partnerships



**Objective 4:** Expand access to desirable and affordable housing.

#### RESULTS

- ▶ Close Wellston financing
- ▶ Close Arbor Hill financing
- ▶ Successful implementation of PBV RFP







## Memorandum

**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director and CEO

**From:** Kawanna Tate, Director of Housing Administration

**Date:** August 22, 2023

**Subject:** *Housing Administration Report*

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At our last meeting we discussed our performance projections for the Management Assessment Sub-System (MASS) of the Public Housing Assessment System (PHAS). Today I will cover our current projections and other programmatic updates.

**I. Current MASS Performance**

Below is a snapshot of our current performance for each of the sub-indicators of the MASS. During this period, the occupancy rate has not changed and remains at an average of 100% resulting in a 16-point maximum.

Sub-Indicator	Performance	Projected Points	Max Points
Occupancy	100%	16	16
Accounts Payable Ratio	0.89	2	4
Tenant Accounts Receivable	0.407	0	5
<b>Current Snapshot</b>	<b>Standard Performer</b>	<b>18</b>	<b>25</b>

**II. Other Updates**

**A. Resident Advisory Board Meeting**

The Authority convened a Resident Advisory Board Meeting (RAB) on August 14, 2023. Those Olivette residents who expressed interest in joining were invited to participate. Due to scheduling, we will present the results of this meeting at the Board meeting.



## Memorandum

**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director and CEO

**From:** William Barry, Director of Maintenance and Facilities

**Date:** August 22, 2023

**Subject:** *Maintenance Report*

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This memo summarizes the monthly maintenance and supply costs for the Olivette Public Housing from April 1 through July 31, 2023.

**I. Maintenance Supply Costs**

The following are repair and replacement costs for plumbing supplies, appliance repairs, window repairs, furnace repairs, and paint supplies required to ensure the units meet Housing Quality Standards.

April	\$	276
May	\$	0
June	\$	490
July	\$	706
<b>TOTAL</b>	<b>\$</b>	<b>1,472</b>

**A. Attachment:** List Work Orders from April through July 2023

**II. Contracted Repair Costs**

These costs include trash services, groundskeeping, and janitorial services.

April	\$	16
May	\$	0
June	\$	1,454
July	\$	0
<b>TOTAL</b>	<b>\$</b>	<b>1,470</b>

**III. Other Maintenance Costs**

These costs include vehicle maintenance and vehicle fuel cost.

April	\$	54
May	\$	98
June	\$	22
July	\$	43
<b>TOTAL</b>	<b>\$</b>	<b>217</b>



### Work Order (WO) Detail

Olivette Housing Authority (1132bolv)  
Work Orders active between 04/01/2023 and 08/01/2023

Unit	WO	WO Category	Brief Description	Call Date	Date Completed	Days to Complete	Days Open this Period
RH9388	34960		A/C is not working	04/05/2023	04/05/2023	1	1
RH9348	34974		Gutters falling	04/07/2023	04/11/2023	4	4
RH9380	34987	HVAC	Still needing a filter	04/11/2023	04/12/2023	1	1
RH9342	34997	Doors	Master bathroom door off hinge	04/12/2023	04/12/2023	1	1
RH9357	34998	Walls-Ceilings	Needing some paint.	04/12/2023	04/19/2023	7	7
RH9330	35078	Doors	Replace bedroom door.	04/26/2023	04/27/2023	1	1
RH9330	35084	Walls-Ceilings	Ceiling in bathroom is falling in.	04/26/2023	04/27/2023	1	1
RH9345	35088	Doors	Front screen door is damaged	04/27/2023	05/01/2023	4	4
RH9363	35123	Walls-Ceilings	Bathroom ceiling falling in	05/03/2023	05/04/2023	1	1
RH9342	35183		Storm door handle broke off	05/12/2023	05/15/2023	3	3
RH9342	35184		Bathroom sink drains slowly	05/12/2023	05/12/2023	1	1
RH9356	35204		Needs new front and back screen door	05/15/2023	06/09/2023	25	25
RH9379	35422		A/C is not working	06/22/2023	06/23/2023	1	1
RH9371	35453	Walls-Ceilings	Wall tile falling off	06/27/2023	07/12/2023	15	15
RH9345	35502	Building Exterior	Due to the storm, shingles fell off	07/03/2023	07/21/2023	18	18
RH9387	35504	Building Exterior	Covering for carport blew off	07/03/2023	07/21/2023	18	18
RH9387	35505	Appliance	Making loud noises	07/03/2023	07/12/2023	9	9
RH9371	35520		Shower tiles are lifting	07/05/2023	07/12/2023	7	7
RH9371	35521		Living room floor tiles lifting	07/05/2023	07/12/2023	7	7
RH9372	35526	General	Stopper for tub is broke	07/06/2023	07/12/2023	6	6
RH9379	35554	HVAC	A/C is not working	07/11/2023	07/12/2023	1	1
RH9388	35560	Windows	Cannot shut bedroom window	07/11/2023	07/26/2023	15	15
RH9345	35604	Windows	Sure window in basement	07/17/2023	07/26/2023	9	9
RH9345	35605	Building Exterior	Replace shingles	07/17/2023	07/26/2023	9	9
RH9345	35606	General	Replace toilet seat	07/17/2023	07/26/2023	9	9
RH9356	35636	Appliance	Making a loud noise.	07/21/2023	07/24/2023	3	3
RH9356	35637	HVAC	A/C is not working	07/21/2023	07/24/2023	3	3
RH9357	35710		Oven not working	07/31/2023	08/04/2023	4	1
RH9357	35711		Water pressure low	07/31/2023	08/08/2023	8	1

Total Number of Work Orders:	29
Work Orders closed within 25 days:	29
Total calendar days it took to complete work orders:	182
Average completion days:	6.28
Average completion days for reporting period 2 years prior:	1.00
Reduction in average completion days over the past three years:	-5.28



## Memorandum

**To:** Board of Commissioners, Housing Authority of the City of Olivette

**Through:** Shannon Koenig, Executive Director and CEO

**From:** Emily Smith, Director of Program Compliance and Training

**Date:** August 22, 2023

**Subject:** *NSPIRE*

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This memo provides information about changes to the U.S. Department of Housing and Urban Development's (HUD) inspection standards.

### I. **Background**

In 1998, HUD created the office of Real Estate Assessment Center (REAC) to enhance the accuracy and consistency of physical inspections for HUD-assisted and public housing units. REAC developed the Uniform Physical Condition Standards (UPCS) to standardize the inspection process for the public housing program. Housing Quality Standards (HQS) were also created for the Housing Choice Voucher (HCV) program.

REAC inspectors use the UPCS to conduct inspections of public housing units and provide scores to Public Housing Agencies (PHA). The REAC inspection scores affect the PHA's overall Public Housing Assessment System (PHAS) score. For the HCV program, HQS inspections occur at private market units where HCV participants reside or wish to reside. The HQS inspections are completed by the Authority's own inspectors and affect the Authority's score on the Section Eight Management Assessment Program (SEMAP).

### II. **Changes to Inspection Standards**

#### A. **NSPIRE**

On July 1, 2023 HUD implemented the National Standards for the Physical Inspection of Real Estate (NSPIRE) as the new physical inspection model designed to promote HUD's goal of reducing health and safety hazards in the home. NSPIRE replaces UPCS and HQS, standardizing the inspection process for HUD programs so the same expectations of housing quality can be achieved across all programs.

#### B. **Inspectable Areas**

Under UPCS, there were five separate inspectable areas: site, exterior, systems, common areas, and unit. The new NSPIRE protocol reduces the inspectable areas to three different categories: outside, inside, and unit. The change to inspectable areas emphasizes the importance of the residents' unit rather than the exterior or appearance of the development or building.

### **C. Deficiencies**

The new NSPIRE protocol includes a more comprehensive and detailed list of inspectable items and possible deficiencies. There are more health and safety defects than UPCS formerly listed, and many of these defects are considered "severe" health and safety defects which require a repair within 24 hours. This change emphasizes the importance of the residents' wellbeing.

Deficiency severity has also changed with NSPIRE. Under UPCS, each deficiency could be assigned a level of severity that would result in varying deductions in points. To create more objectivity during the inspection process, NSPIRE removes the levels of severity criteria.

### **D. REAC Inspections**

Going forward, REAC inspections will use the new NSPIRE protocol rather than the UPCS protocol. Under NSPIRE, the REAC inspections will require a larger sample size of units for inspection. The REAC inspections will also use the new NSPIRE scoring model which assigns different point deductions to different types of deficiencies. The REAC inspections will continue to impact the PHAS score and dictate how often the REAC inspections will occur.

## **III. The Authority's Response to NSPIRE**

### **A. Training**

To prepare for NSPIRE, the Authority procured NSPIRE and REAC training through U.S. Inspections Group, Inc. (USIG). USIG offers specialized inspection training courses for PHAs and other housing entities and leads the industry in inspection standards training.

The training was a two-day, on-site course that included the review of each individual inspection standard and deficiency under NSPIRE, real-life examples and photos of deficiencies, onsite inspections of two Authority units, and an exam for each training participant. The training was attended by all the Authority's maintenance and facilities, inspections, and property management staff.

### **B. Implementation**

In response to NSPIRE, and with the completion of the training, the Authority has begun NSPIRE self-inspections for its public housing and HUD-assisted units. The Housing Quality Inspection Department has already completed 60 inspections at Fee Fee Manor and is in the process of prioritizing and scheduling more inspections. These self-inspections will be completed at least annually to ensure that work orders are being generated and addressed appropriately. This will also help ensure that all units are prepared for REAC inspections.

### **C. Resident Education**

The Authority has been hosting resident meetings for each of its PHAs. At the meetings, residents are informed of the changes to the inspection standards and how these changes will affect them. The Authority hopes that by sharing this information with residents, both the Authority and residents will be prepared for upcoming inspections, and ultimately able to improve REAC and PHAS scores.