



2025 Five-Year and Annual Public Housing Agency (PHA) Plan
Housing Authority of the City of Bloomington

DRAFT- PROPOSED PLAN EFFECTIVE 1/1/2025

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1. Introduction and Summary

The PHA Plan is a comprehensive guide to public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals. There are two parts to the PHA Plan: the 5-Year Plan, which each PHA submits to HUD once every 5th PHA fiscal year, and the Annual Plan, which is submitted to HUD every year.

The Housing Authority adopted its last 5-year plan on September 24, 2019 (Resolution 1416), which covers the 5-year period ending December 31, 2024. Thus, the 2025 Annual PHA Plan will also include the required elements and serve as a new 5-year Plan.

2. Form HUD-50075-ST (Annual PHA Plan Template)

This form is the summary document that provides key information about the annual PHA Plan submittal. Information provided in this 2025 Annual PHA Plan will be entered onto HUD-50075-ST and submitted to HUD.

3. Form HUD-50075-5Y (Five-Year PHA Plan Template)

This form is the summary document providing key information about the Five-Year PHA Plan submittal. The information provided in this document will be entered onto HUD-50075-5Y and submitted to HUD.

4. Five-Year Plan Elements

a. MISSION

Providing quality affordable housing and self-sufficiency opportunities to low- and moderate-income citizens of McLean County

These are the values that guide the actions and inform the decisions of the Housing Authority:

Compassion	Cooperation/Teamwork	Integrity
Empathy	Collaboration/Partnership	Transparency
Positivity	Stewardship	Leadership
Adaptability/Versatility	Accountability	Commitment/Diligence

b. GOALS & OBJECTIVES

Goal 1: Help our residents and clients by connecting them with a range of education, employment, health, and social resources.

Objective 1.1: Educate the public about our public housing and Section 8 programs and how they can partner to help our residents and clients.

Objective 1.2: Continue to support, expand participation, and enhance enrichment opportunities for public housing residents and HCV participants (e.g. Family Self-Sufficiency (FSS), Resident Opportunities for Self-Sufficiency (ROSS), CDBG-funded job training, and other recreation opportunities, etc.)

Objective 1.2: Expand education of the Homeownership program and support families in achieving homeownership goals.

Goal 2: Operate the Housing Choice Voucher (HCV) Program as efficiently as possible to provide the most possible benefit to the community.

Objective 2.1: Consider options of for expanding leasing opportunities.

Objective 2.2: Educate the public and landlords about the benefits of the HCV program.

Objective 2.3: Review and revise HCV policies and procedures to most efficiently provide the best possible service to clients and landlords.

Objective 2.4: Evaluate staff duties and realign as needed to maximize efficiency.

Goal 3: Carefully plan for the most efficient use of Housing Authority buildings and sites.

Objective 3.1: Conduct a formal assessment of the physical needs of the public housing portfolio and use the assessment for prioritization and planning of capital improvements.

Objective 3.2: Evaluate the options for the best long-term use of the Lawrence Irvin Neighborhood Center, which is expected to be vacated by the Boys & Girls club in the future.

Objective 3.3: Consider options for improving administrative office space and building security to provide a better experience for clients and employees.

Goal 4: Advocate for and participate in efforts to expand affordable housing options in the community.

Objective 4.1: Proactively seek development partnerships to create new opportunities for affordable housing using tools such as project-based vouchers.

Objective 4.2: Evaluate need to revive not-for-profit organization for affordable housing development.

Objective 4.3: Collaborate with community partners to study and advocate for affordable housing.

Goal 5: Invest in staff training, employee development, and management tools to improve agency operations, foster innovation, and expand staff leadership capacity.

Objective 5.1: Evaluate key agency processes (e.g. interim rent reviews, public housing move-outs, etc.) to identify opportunities for streamlining.

Objective 5.2: Prepare staff training and development plan for each position.

Objective 5.3: Continue to develop staff and board expertise in the financial elements of federal housing programs for better long-term fiscal planning within the agency.

Goal 6: Use technology to improve client service, be more efficient, and promote Housing Authority programs.

Objective 6.1: Upgrade agency information technology tools, including web and mobile capabilities.

Objective 6.2: Make better use of outside technology expertise and study other agencies as a model for using technology to advance the agency mission.

c. PROGRESS REPORT

Listed below are the goals and objectives from the 2020 Five-Year Plan (in italics) and a report on the progress achieved by the agency since those goals and objectives were established.

- 1 *Help our residents and clients by connecting them with a range of education, employment, health, and social resources.*
 - 1.1 *Educate the public about our public housing and Section 8 programs and how they can partner to help our residents and clients.*
 - 1.2 *Continue to support and enhance enrichment opportunities for public housing residents (e.g. Family Self-Sufficiency (FSS), Resident Opportunities for Self-Sufficiency (ROSS), CDBG-funded job training, holiday gift baskets distribution, gardening and other recreation opportunities, etc.)*
 - 1.3 *Evaluate the benefits and costs of separate not-for-profit organization that could assist public housing residents and provide training to residents.*

PROGRESS REPORT: The agency continues to work closely with community partners in providing information regarding our residents and participants. We will continue to foster and develop key relationships with community partners and stakeholders. The Housing Authority continues to diligently improve both its Family Self Sufficiency (FSS) program and the Resident Opportunities for Self Sufficiency (ROSS) program. The plan has not been recently updated, but line staff and management both monitor the performance of the program and new policies when issued. We have increased our FSS and ROSS participation over the last five years and we

have also been awarded our renewal grants for both programs. Will continue to grow and expand our resources for FSS and ROSS program and monitor its program performance. We have been successful each year with job fairs and expanding career opportunities for our residents and participants. We will continue to explore the options of career opportunities and advancement with CDBG funding. We were successful in receiving funding for summer swimming lessons, holiday activities and other resources. We continue to foster our relationships with community partners for resources such as gardening and other recreational opportunities. The not-for-profit organization has been established and the housing agency is reviewing options that could assist our residents and participants.

- 2 *Operate the Housing Choice Voucher (HCV) Program as efficiently as possible to provide the most possible benefit to the community.*
 - 2.1 *Consider options for managing HCV waiting list in ways that will reduce the length of time applicants are on the waiting list.*
 - 2.2 *Educate the public and landlords about the benefits of the HCV program.*
 - 2.3 *Review and revise HCV policies and procedures to most efficiently provide the best possible service to clients and landlords.*
 - 2.4 *Evaluate staff duties and realign as needed to maximize efficiency.*

PROGRESS REPORT: The Housing Authority has made significant progress in the last five years in improving our management of the waitlist. We reopened our waitlist in 2022 for the first time since 2014 and we changed the selection process. Our current waitlist is almost exhausted and therefore this will remain an objective moving forward. Our HCV department has completed presentations to community partners over the last two years. The agency is developing a landlord presentation that utilizes technology to inform the community of our program. The housing authority has revised the Administrative Plan several times over the last five years due to COVID, FSS, and internal procedures. We will continue to make significant changes to the Administrative Plan when new regulations are approved by HUD. We have restructured our workflow in the department for better efficiency. Moving forward, we will develop and build out the department to maximize efficiency as we increase our voucher usage in our jurisdiction.

- 3 *Carefully plan for the most efficient use of Housing Authority buildings and sites.*
 - 3.1 *BHA Conduct a formal assessment of the physical needs of the public housing portfolio and use the assessment for prioritization and planning of capital improvements.*
 - 3.2 *Evaluate the options for the best long-term use of the Lawrence Irvin Neighborhood Center, which is expected to be vacated by the Boys & Girls club in the future.*
 - 3.3 *Consider options for improving administrative office space to provide a better experience for clients and employees.*

PROGRESS REPORT: The housing authority has not conducted a formal assessment, however, an internal assessment and created a comprehensive plan for capital needs improvement. The Boys and Girls club do not have a short-term vacate plan therefore the housing authority have included capital funding for the repairs of the structure. We will continue to monitor the lease for the boys and girls club. We are continuing to evaluate the administrative office spaces for

best security design. We are continuing to review administrative workspaces and making changes accordingly.

- 4 *BHA Advocate for and participate in efforts to expand affordable housing options in the community.*
 - 4.1 *Proactively seek development partnerships to create new opportunities for affordable housing using tools such as project-based vouchers.*
 - 4.2 *A Evaluate need to revive not-for-profit organization for affordable housing development.*
 - 4.3 *Collaborate with community partners to study and advocate for affordable housing.*

PROGRESS REPORT: The housing authority is engaging with developers for PBV vouchers. We are continuing our efforts to determine potential developments in the community to create new opportunities for affordable housing. The housing agency has developed the not-for-profit and will work over the next five years to determine viable options for expanding affordable housing. The agency is exploring options with community partners to study and advocate for affordable housing. The executive director will re-engage with the appointing official (mayor) regarding the expansion of affordable housing options in our community.

- 5 *Invest in staff training, employee development, and management tools to improve agency operations, foster innovation, and expand staff leadership capacity.*
 - 5.1 *Evaluate key agency processes (e.g. interim rent reviews, public housing move-outs, etc.) to identify opportunities for streamlining.*
 - 5.2 *Prepare staff training and development plan for each position.*
 - 5.3 *Continue to develop staff and board expertise in the financial elements of federal housing programs for better long-term fiscal planning within the agency.*

PROGRESS REPORT: The housing agency has experienced a high staff turnover rate over the last two years and several significant changes in regulations have boosted our need for staff training and employee development. Key roles have been fulfilled and therefore staff training is an essential part of our team's success. We have set aside funding to ensure staff is able to attend trainings remote and on site as they become available. The agency is working to develop relevant training plans for each position, and we look forward to providing more board training and developing the expertise in the financial element of federal housing programs.

d. VAWA GOALS

By adopting Resolution 1382 in 2017, the Housing Authority updated its Violence Against Women Act (VAWA) Policy in compliance with HUD's final rule (81 FR 80724) implementing the 2013 reauthorization of VAWA. At that same time, the Housing Authority also adopted an Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Resolution 1383). These policies enable the Housing Authority to serve the needs of victims of domestic violence, dating violence, sexual assault, and stalking.

The Housing Authority also establishes these goals to better serve and protect victims of domestic violence, dating violence, sexual assault, and stalking:

- Provide training on a regular basis to Housing Authority staff that will improve their understanding of the needs of victims of domestic violence, dating violence, sexual assault, and stalking. This will include reviewing the resources available in the community in order to allow staff to make referrals for services.
- Make housing program participants more aware of the services available to prevent domestic violence, dating violence, sexual assault, and stalking.
- Periodically review Housing Authority policies and procedures related to domestic violence, dating violence, sexual assault, and stalking to ensure they function in a way that best serves victims.

e. SIGNIFICANT AMENDMENT OR MODIFICATION

A PHA, after submitting its 5-Year Plan or Annual Plan to HUD, may amend or modify any PHA policy, rule, regulation or other aspect of the plan. If the amendment or modification is a “significant amendment or modification”, as defined in 24 CFR 903.7(r)(2), the PHA

(1) May not adopt the amendment or modification until the PHA has duly called a meeting of its board of directors (or similar governing body) and the meeting, at which the amendment or modification is adopted, is open to the public; and

(2) May not implement the amendment or modification, until notification of the amendment or modification is provided to HUD and approved by HUD in accordance with HUD's plan review procedures, as provided in 24 CFR 903.23.

A significant amendment or modification to a plan submitted to HUD is subject to the requirements of 24 CFR 903.13, 903.15, and 903.17.

The Housing Authority’s definitions of “Significant Amendment” and “Substantial Deviation” is attached below for reference; no revisions to the policy are proposed.

Definition of Substantial Deviation and Significant Amendment

Substantial deviation to the 5-Year Plan or Significant Amendment or modification to the Annual plan are any additional changes that would affect the Housing Authority of the City of Bloomington’s mission, goals, objectives, and policies as stated in the Plan. The plan, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur. The Housing Authority defines *substantial deviation* as:

- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.
- A change in federal law takes effect and, in the opinion of the Housing Authority, it creates substantial obligations or administrative burdens beyond the programs under administration, excluding changes made necessary due to insufficient revenue, funding or

appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree.

A Significant Amendment or Modification to the Annual Plan and five-year Plans is defined as:

- Changes of a significant nature to the rent or admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to effect a change in the Section 8 Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).
- Proposed demolition, disposition, homeownership, Capital Fund Financing, development, mixed finance proposal, or conversion activities will be considered significant amendments to the CFP 5-Year Action Plan.
- Addition of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action Plan that exceeds \$100,000.

The exceptions to this Policy rule are as follows:

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification.
- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification.
- Discretionary or administrative amendments consistent with the Housing Authority's stated overall mission and objectives will not be considered substantial deviations or modifications.

f. RAB COMMENTS

A meeting of the Resident Advisory Board was convened on October 1, 2024 at 5:00 P.M. at the Housing Authority's administrative office.

A selection of public housing residents from various sites and AMP's and several Section 8 voucher holders were invited to participate in the meeting. A total of 13 program participants were invited to participate and three residents attended the meeting. They are listed below:

- Jeffery Detherage
- Ryan Osborn
- Erica and Jarrod Shy
- Beverly Bronson
- Francis Coughlin
- Evelyn Johnson
- Laura Kantorzyk
- Lori Teagarden

- Jeff Walls
- Wagner Wood
- Pamelas McGee
- Anita Reynolds
- Priscilla Turner

At the meeting, the Executive Director presented the draft 5-Year and Annual Plan, including all proposed changes to the Public Housing Admission and Occupancy Policy (ACOP). In addition to reviewing each individual change to the ACOP we reviewed the Administrative Plan and Capital Improvements outlined in the proposed Capital Fund Program 5-Year Action Plan as well as the proposed agency goals and objectives.

Although the Resident Advisory Board did not adopt formal comments on the plan, there was discussion about the proposed changes to the agency goals and objectives. Participants asked questions about changes to operation of the ACOP and Admin Plan as well as policies. There was also discussion of the proposed change to the ACOP related to “How income is calculated under HOTMA”. In general, the Resident Advisory Board expressed support for the ACOP revisions and plan components as presented.

g. CERTIFICATION BY STATE OR LOCAL OFFICIALS

Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, will be submitted by the PHA as an electronic attachment to the PHA Plan.

5. Annual Plan Elements

a. PUBLIC HOUSING ADMISSION AND OCCUPANCY POLICY (ACOP)

The Housing Authority is proposing to adopt the Public Housing Admission and Occupancy Policy (ACOP), which is a key document used by Housing Authority staff to administer the public housing program consistently and fairly. In many cases, the ACOP simply restates federal regulations. However, the Housing Authority has discretion in many areas to go beyond the scope of these regulations. The ACOP is a document intended for reference and use by residents and the general public in order to better understand the basis for Housing Authority decisions related to the public housing program.

The ACOP can only be amended by the Board of Commissioners (except when amendments are required by federal regulations). Housing Authority staff reviews the ACOP at least annually to consider revisions that would be in the best interest of the public housing program. The following revisions were proposed by staff 10/1/2024 and take effect January 1, 2025:

HUD Mandates- Significant Changes

Chapter 3

Restriction on Assistance Based on Assets

Required Denial of Admission

Chapter 6

Calculation of Annual & Interim Income

Types of Assets (exclusions)

Asset Limitations (\$100,000.00)

Utility Allowance

Health & Medical Deductions (10% vs 3%)

Elderly (\$525) & Deduction (\$480 HUD will change annual)

Chapter 7

Family consent to Release information

Student Financial Assistance

Income Excluded (Family members receiving payments that allow a disabled individual to live at home)

Chapter 8

NSPIRE INSPECTIONS- changing from REAC to Nspire inspection

Chapter 13

Over Income Families (24 months maximum stay in public housing)

Staff Changes

Chapter-16-

Repayment Policy (\$1000.00 or less)

b. SECTION 8 HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN

The Housing Authority has adopted an Administrative Plan for the Housing Choice Voucher Program, which is a frequently referred to as just the “Administrative Plan” or “Admin Plan”. This document is used by Housing Authority staff to administer the housing choice voucher program consistently and fairly. In many cases, the Administrative Plan simply restates federal regulations. However, the Housing Authority has discretion in many areas to go beyond the scope of these regulations. The Administrative Plan is a document intended for reference and use by participants and the general public in order to better understand the basis for Housing Authority decisions related to the housing choice voucher program.

The Administrative Plan can only be amended by the Board of Commissioners (except when amendments are required by federal regulations). Housing Authority staff reviews the Administrative Plan at least annually to consider revisions that would be in the best interest of the housing choice voucher program. The following revisions were proposed by staff 10/1/2024 and take effect January 1, 2025:

HUD Mandates

Chapter 1

Added information on the Housing Opportunity through Modernization Act (HOTMA) to the Overview and History of the Program section. Revised the section on Contents of the Plan to include information on project-based vouchers and policies governing special housing types.

Chapter 2

Expanded the existing policies on discrimination complaints with a new section on Discrimination Complaints., which includes guidance from Notice FHEO 2023-01.

Chapter 3

Revised various areas of the chapter to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. This includes a new section on Restriction on Assistance Based on Assets.

Chapter 6 (Income)

This chapter was completely rewritten from the ground up to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. Included also are changes regarding exceptions to utility allowances as a reasonable accommodation.

Chapter 7

As with Chapter 6, the bulk of this chapter had to undergo a complete rewrite for HOTMA. Many of the changes were required due to updates in verification requirements outlined in Notice PIH 2023-27

Chapter 15

Includes policies by default rather than directing to the guide. Policies are now included where relevant in the event that the PHA grants use of a special housing type as needed as a reasonable accommodation.

Chapter 16

Included changes regarding exceptions to utility allowances as a reasonable accommodation. Modified the policy on evidence for the informal hearing to eliminate the charge of copying documents related to the hearing. Added a record retention policy that the PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to fair housing violations.

Chapter 17

Made minor updates to account for the Federal Register notice issued March 3, 2023, on subsidy layering requirements. Added a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.

Chapter 18

Added information and clarification to the Applicable Regulations, PBV Percentage Limitation and Unit Cap, Inspecting Units, and Continuation of Housing Assistance Payments sections to account for the most recent Rental Assistance Demonstration (RAD) notice, PIH 2023-19.

Added a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.

This section describes the housing needs of the low-income, very low-income, and extremely-low income families, elderly families, families with disabilities, and households of various races and ethnic groups who reside in the Housing Authority's jurisdiction, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists.

The housing need assessment discussed is organized into three components. These include (1) families with incomes below 30 percent of area median, (2) elderly families, and (3) households of various races and ethnic groups residing in the City of Bloomington or on the waiting list.

Extremely Low-Income

Households with incomes under 30 percent of the area median income as reported by HUD are classified as extremely low income. The median family income for the Bloomington-Normal metro area for FY 2024 is \$109,400. An extremely low-income household of four individuals would have less than \$32,800 in income.

According to the U.S. Census Bureau (2017-2021 American Community Survey (ACS) 5-Year Estimates), there were 18,247 households in Bloomington with annual income below the poverty line (7.6% of all households). A close approximation of extremely low income is the federal poverty level. The ACS reports that 8.4% of all families residing in the City of Bloomington had income in the past 12 months that was below the poverty level. The poverty rate for households with related children under 5 was higher at 10.4%, and for all households with children under 18 years, the portion below the poverty line was 12.5%. These rates have decreased slightly from previous versions of the ACS 5-year estimates.

The latest ACS tables also indicate that 4,809 renter-occupied households paid gross rents that were 30% or more of their household income. This number of rent-burdened households has grown by 12.6% over the last two years (i.e., 539 more households in Bloomington are considered rent-burdened).

Taken together, these figures demonstrate the growing demand for affordable housing in Bloomington. Given that poverty rates for households with children is higher than the general population, the need for affordable housing for families with children is especially important.

Elderly Households

According to the ACS 5-Year Estimates, there are 8,430 individuals in Bloomington aged 65 years and older, which represents 11.2% of the population. As of the 2010 Census, there were 1,401 renter-occupied housing units in Bloomington occupied by persons 65 and over. This represents 11.9% of all renter-occupied households. The proportion of elderly households in Bloomington that are below the poverty level is 8.5%. This is lower than the overall poverty rate of 12.9%. For elderly households below the poverty line (\$15,060 for a one-person household or \$20,290 for two-person household), housing costs will be a major expense, likely to consume more than 30% of income.

Race/Ethnic Groups

The burden of poverty and housing problems fall disproportionately on minority households, particularly on African American and Hispanic/Latino households. According to the 2012-2016 ACS 5-Year Estimates, 32.4% of African American families and 9.7% of Hispanic/Latino households in Bloomington were below the poverty level, whereas just 6.5% of white families had income below the poverty line. This indicates that the need for affordable housing is most acutely felt by African American households, followed by Hispanic/Latino households.

Strategy for Addressing Housing Needs

The Housing Authority of the City of Bloomington is proposing to adopt a five-year plan that addresses the housing needs of families of the public housing and Housing Choice Voucher programs and on the waiting list for the next five years.

The target populations, the Housing Authority of the City of Bloomington has identified as a priority for addressing affordable housing are the extremely low-income and low-income households in Bloomington, Illinois.

The Housing Authority will continue to apply and receive Capital Fund Grants to preserve and modernize the existing public housing units.

The Housing Authority will increase the availability of affordable housing units by leveraging affordable housing resources through the creation of mixed-finance housing.

The Housing Authority will affirmatively market to races/ethnicities shown to have disproportionate housing needs. The Housing Authority will utilize data to increase awareness of the Housing Authority resources as indicated by families on the Public Housing Waiting List to assess the needs and plan accordingly.

The Housing Authority will apply for special purpose grants targeted at providing self-sufficiency assistance to residents of public housing and HCV participants that support and encourage work.

d. DECONCENTRATION AND OTHER POLICIES THAT GOVERN ELIGIBILITY, SELECTION, AND ADMISSIONS

The Housing Authority's Deconcentration Policy is provided below for reference; no revisions to the existing policy are proposed. Other policies governing eligibility, selection, and admissions to the *public housing program* are found in the ACOP. Note that a series of revisions to the ACOP are proposed as part of the Annual PHA Plan adoption process. These proposed revisions include components of the Public Housing Program. The full list of changes to the ACOP are listed above in Section 5.A of this document.

Policies governing eligibility, selection, and admission to the Section 8 Housing Choice Voucher program are found in the Housing Choice Voucher Administrative Plan.

DECONCENTRATION POLICY STATEMENT

PUBLIC HOUSING:

In an ongoing effort for The Housing Authority to meet or exceed the laws and regulations regarding its public housing programs, the following Deconcentration Policy has been developed to comply with the Quality Housing and Work Responsibility Act of 1998, Section 513.

INCOME MIX TARGETING: To meet the requirements of the Act, and subsequent HUD regulations, at least 40 percent of families admitted to public housing by the Housing Authority must have incomes that do not exceed 30% of the area median. If 40% or more of the housing authority units are occupied by families whose incomes do not exceed 30% of the area median income, this requirement shall be considered as being met.

PROHIBITION OF CONCENTRATION OF LOW-INCOME FAMILIES: The housing authority may not, in meeting this income mix targeting, concentrate very low-income families, or other families with relatively low incomes, in public housing units in certain developments. The Housing Authority will review the income and occupancy characteristics of the housing site to ensure that a low-income concentration does not occur.

DECONCENTRATION: The Housing Authority shall make every effort to deconcentrate families of certain income characteristics within the PHA complexes. To achieve this, the Housing Authority may offer incentives for eligible families having higher incomes to occupy dwelling units in projects predominantly occupied by eligible families having lower incomes. The determination of the higher incomes will be the same as listed on the point preference sheet for applicants who get broad range of income points.

The Housing Authority will continue to track the income mix within each AMP as an effort to avoid a concentration of higher or lower income families in any one development. It will vary annually based on a determination of the average income of all current public housing residents.

e. FINANCIAL RESOURCES

STATEMENT OF FINANCIAL RESOURCES (pending current resources)

The projected financial resources of the Housing Authority of the City of Bloomington during the plan year (FY 2025) are:

Program	Source	Use of Funds	Amount
Low-rent Housing	Operating Subsidy	Normal Operations	\$ 2,005,167
Low-rent Housing	Rents & Misc Charges	Normal Operations	\$ 1,625,187
Low-rent Housing	Non-rental Income	Normal Operations	\$ 113,820
Low-rent Housing	Capital Fund Program	Capital Improvements	\$ 1,318,728
Low-rent Housing	Congregate Housing		

	Services Program (CHSP)	Congregate Living	\$ 162,092
Low-rent Housing	ROSS Program	Family Self Sufficiency	\$ 75,000
Housing Assistance	Section 8 Existing	Section 8 Vouchers	\$ 2,315,854
Housing Assistance	Section 8 Existing	Section 8 Admin	\$ 247,121
Housing Assistance	SRO Project Based	SRO Vouchers	\$ 41,770
Housing Assistance	ROSS Program	Family Self Sufficiency	\$ 49,700
Housing Assistance	Mainstream	Vouchers	\$ 46,000
Housing Assistance	Mainstream	Administration	\$ 3,510
		TOTAL	\$ 8,003,949

f. RENT DETERMINATION

The Rent Determination Policy is attached below for reference; no revisions to the policy are proposed.

Rent Determination Policy

The monthly Total Tenant Payment (TTP) amount for a family shall be an amount, based on the total family income, as verified by the Housing Authority that does not exceed the greatest of the following amounts:

1. 30% of Monthly Adjusted Income (after adjustments);
2. 10% of Monthly Income (before adjustments);
3. Flat rent is reviewed annually and set at no less than 80% of the Fair Market Rent. Existing flat rental payment will not exceed 35% to comply with the statutory changes contained within Public Law 113-76, Fiscal Year 2014 Appropriation Act.
4. Minimum TTP (Total Tenant Payment) of \$50.

g. OPERATION AND MANAGEMENT

OPERATION AND MANAGEMENT POLICIES

The primary business of the Housing Authority of the City of Bloomington (HACB) is the ownership and management of residential communities and provider of rental assistance to a variety of special users that have in common an inability to compete successfully for shelter in the open market. To ensure the successful performance of that business, the HACB has the following policies that govern our operations:

- Public Housing Admissions and Continued Occupancy Policy (ACOP)

- Section 8 Administrative Plan
- Asset Management Plan
- Capitalization Policy
- Carbon Monoxide Alarm Detector Act Statement
- Carbon Monoxide Detectors Policy
- Contagious Disease Policy
- Community Service and Self Sufficiency Policy
- Deconcentration Policy
- Employee Handbook
- Ethics Policy
- Grievance Procedures
- Facilities Use Policy
- Family Self Sufficiency Policy
- Resident Fire Protection Policy
- Freedom of Information Policy
- Disposition Policy
- Drug Free Policy
- Harassment Policy
- Investment Policy
- Internal Control Policy
- Lobby and Balcony Policies (Wood Hill Towers)
- Maintenance Policy
- Needle and Syringe Disposal Policy
- Oxygen Fire Safety Policy
- Pest Control Policy
- Pet Policies
- Personnel Policy
- Policy on Animals Necessary as a Reasonable Accommodation
- Poor Housekeeping Policy
- Procurement Policy
- Reasonable Accommodation Policy
- Rent Determination Policy
- Rent Collection Policy
- Travel Policy
- Trespass and Ban Policy
- Upfront Income Verification (UIV) System Security Policy
- Violence Against Women Act (VAWA) Plan
- Satellite TV Policy

Copies of these policies can be found at our Administrative Office, located at 104 E. Wood Street

The HACB operates the following programs:

PROGRAM	BRIEF DESCRIPTION
Public Housing	607 leasable units of public housing.
Section 8	467 vouchers.
Capital Fund	Renovate or modernize public housing units.

Elderly Services

Activities of daily living needs of elderly and disabled adults.

The HACB has 611 public housing units in the following locations.

DEVELOPMENT NAME	NUMBER OF UNITS
Sunnyside Court	100
Holton Homes	64
Evergreen Place	36
John P. Kane Homes	30
Wood Hill South Towers	141
Wood Hill Family	50
Wood Hill North Towers	136
Irvin Apartments	26
Nierstheimer Apartments	16
McGraw Apartments	8

The HACB operates a tenant-based program under the Housing Choice Voucher program. We are authorized to issue up to 467 vouchers. Due to federal funding limitations, HACB is only able to assist approximately 385 households through the program. On average 50 vouchers are surrendered each year and new families are assisted under this program.

The Housing Authority Board of Commissioners consists of a 3-member board appointed by the Mayor of Bloomington. One seat on the Board is required to be a resident commissioner.

h. GRIEVANCE PROCEDURES

Grievance procedures related to the public housing program are provided in Appendix G of the ACOP. Grievance procedures related to the housing choice voucher program are provided in Chapter 16, Part III of the Administrative Plan. No changes to this section of the ACOP or Administrative Plan are proposed.

i. HOMEOWNERSHIP PROGRAMS

See Chapter 15, Part VII of the Housing Choice Voucher Administrative Plan. No revisions to the policy are proposed.

j. COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS

See Appendix M of the ACOP. No changes to this section of the ACOP are proposed.

k. SAFETY AND CRIME PREVENTION

The Safety and Crime Prevention Statement is attached below for reference; no revisions to the policy are proposed.

Safety and Crime Prevention Statement

The Housing Authority of the City of Bloomington has established this Safety and Crime Prevention Plan which incorporate the following requirements:

- A. Safety measures are reviewed on a jurisdiction-wide basis to ensure the safety of the residents living in public housing owned and operated by the Bloomington Housing Authority.
- B. The Bloomington Housing Authority Safety and Crime Prevention Plan describe measures to ensure the safety of public housing residents and for crime prevention measure. This Plan describes activities in effect, planned, or contemplated by the Bloomington Housing Authority. This plan further describes the coordination undertaken between the Housing Authority and the Bloomington Police Department for carrying out the objectives of this Plan.

The Housing Authority has a Bloomington Police Officer to assist as a liaison for the police department and the agency. He meets with staff twice a month to discuss police reports and issues pertaining to incidents in public housing sites and HCV units.

The Bloomington Police Department patrol and monitor all public housing sites regularly. The Housing Authority also has a Trespassing Policy that gives the police an additional tool to keep unauthorized individuals off of public housing properties. Individuals arrested on public housing properties are banned from visiting on public housing properties.

The Ban List is updated monthly and shared with the police department. The Police Department is able to access the list and make appropriate arrest of those who return and are located on Housing property after they are banned.

The Housing Authority does have a quantifiable drug/crime data available from the Bloomington Police Department, which is provided on a quarterly basis.

I. PET POLICY

See chapters VIII and IX of the ACOP. No revisions to these policies are proposed.

m. ASSET MANAGEMENT

Asset Management Plan

Authority Profile

The Bloomington Housing Authority (BHA) was organized in 1947. Located in Bloomington, Illinois, BHA is a body of local government with a portfolio of 611 apartments spread throughout 4 asset management projects (AMP's). BHA also administers up to 467 vouchers under the Housing Choice Voucher (HCV) program. A five-member board of commissioners appointed by

the Mayor governs the authority. The Board is currently made up of two community leaders and one resident.

Staffed with 33 full-time employees, the Authority has a ratio of one employee to every 20 apartments (1:20). This ratio is an equal balance between administrative and maintenance staff. Based on a review of the organizational chart, BHA is well staffed with long-term employees in critical roles.

The BHA has centralized certain management functions as a front-line cost and decentralized maintenance operation. Front-line allocations consist of providing resident services, work order processing, and applicant intake. Recertifications and interim adjustments are handled at the property level by the Property Managers of each asset management property (AMP).

The Assessment

The elderly housing at Wood Hill Towers consists of 277 apartments in two multi-story high-rises. The high-rises have, for more than two decades, experienced a vacancy rate of twenty percent (20%) due to a high proportion of the units being obsolete efficiency apartments (one-bedroom units have an occupancy rate of 95% or higher). This has been the Housing Authority's only significant occupancy challenge.

Beginning in 2017, the Housing Authority began a phased program of merging and renovating efficiency units in the North Tower. As of fall 2018, this program is nearly half complete. The project was significantly slowed by COVID but we are working to complete the project over the next two years. 90% expected by 2026.

Long-term, the Housing Authority continues to explore ways to update and upgrade housing units at all its sites, including the largest (and oldest) family housing sites at Sunnyside Court and Holton Homes. The Housing Authority is also exploring opportunities in partnering in the development of mixed-finance development that would expand the community's options for affordable housing.

Site Based Management Services

The Housing Authority will continue to support the site-based asset management model. The core of the asset management plan is the decentralization of the management and leasing functions of the authority. Creating site offices will provide personal customer service and the opportunity to interact with residents will increase. Through the closer relationship between residents and management, issues can be better identified, assistance offered more expediently and the possibility of loss rent reduced. With respect to the public housing inventory, the Housing Authority will continue to pursue long term planning to address maintenance, rehabilitation, redevelopment and capital management. The asset management activities the Housing Authority has undertaken include site-based accounting, inventory control and comprehensive stock assessment.

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|---------------------------------------|
| n. SUBSTANTIAL DEVIATION |
| o. SIGNIFICANT AMENDMENT/MODIFICATION |

The Housing Authority's definitions of "Significant Amendment" and "Substantial Deviation" is attached below for reference; no revisions to the policy are proposed.

Definition of Substantial Deviation and Significant Amendment

Substantial deviation to the 5-Year Plan or Significant Amendment or modification to the Annual plan are any additional changes that would affect the Housing Authority of the City of Bloomington's mission, goals, objectives, and policies as stated in the Plan. The plan, however, will be modified and re-submitted to HUD should a substantial deviation from program goals and objectives occur. The Housing Authority defines substantial deviations as:

- A mandate from local government officials, specifically the governing board of the Housing Authority, to modify, revise, or delete the long-range goals and objectives of the program.
- A change in federal law takes effect and, in the opinion of the Housing Authority, it creates substantial obligations or administrative burdens beyond the programs under administration, excluding changes made necessary due to insufficient revenue, funding or appropriations, funding reallocations resulting from modifications made to the annual or five-year capital plan or due to the terms of a judicial decree.

A Significant Amendment or Modification to the Annual Plan and five-year Plans is defined as:

- Changes of a significant nature to the rent or admissions policies, or the organization of the waiting list not required by federal regulatory requirements as to effect a change in the Section 8 Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).
- Proposed demolition, disposition, homeownership, Capital Fund Financing, development, mixed finance proposal, or conversion activities will be considered significant amendments to the CFP 5-Year Action Plan.
- Addition of non-emergency work items not included in the current CFP Annual Statement or CFP 5-Year Action Plan that exceeds \$100,000.

The exception to this Policy rule are as follows:

- Changes under the above definitions that are required due to HUD regulations, federal statutes, state or local laws/ordinances, or as a result of a declared national or local emergency will not be considered substantial deviation or significant amendment/modification.
- Changes under the above definitions which are funded by any source other than federal funds will not require Plan amendment or modification.
- Discretionary or administrative amendments consistent with the Housing Authority's stated overall mission and objectives will not be considered substantial deviations or modifications.

6. New activities proposed to be undertaken

a. Mixed Finance Modernization or Development

The Housing Authority has entered into a Joint Venture Agreement with the developer of a 56-unit multi-family development on Four Seasons Road in Bloomington. The project will benefit from Low Income Housing Tax Credits (LIHTC's) and will have 17 project-based vouchers provided by the Housing Authority. The project is still in the planning phase with additional discussion the first quarter of 2025.

This project will fulfill a longstanding goal of the Housing Authority to promote and facilitate the development of new affordable housing stock in the community.

b. Project Based Vouchers

The Housing Authority intends to participate in an Agreement to enter into a Housing Assistance Payments (AHAP) Contract for up to 17 project-based vouchers with the developer of a new affordable 56-unit multi-family development in Bloomington. The terms of the project and the provision of project-based vouchers are dictated by a joint venture agreement with the developers. The project is still in the planning phase with construction planned to begin the first quarter of 2025.

The Housing Authority has the authorization under its Administrative Plan to issue additional requests for proposals for the use of project-based vouchers in the coming year, depending on specific affordable housing development needs or opportunities that may arise.

c. Units with Approved Vacancies for Modernization

Bloomington Housing Authority's request to designate 18 additional public housing unit(s) in Vacant HUD Approved- Undergoing Modernization (Unit Not Under Construction) status was approved 8/19/2024.

The table below provides detailed information about each unit with the *Vacant HUD Approved – Undergoing Modernization* status.

PIC Unit #	Effective Date	Expiration Date
312	08-01-2024	07-31-2026
412	08-01-2024	07-31-2026
413	08-01-2024	07-31-2026
511	08-01-2024	07-31-2026
513	08-01-2024	07-31-2026
611	08-01-2024	07-31-2026
612	08-01-2024	07-31-2026
613	08-01-2024	07-31-2026
711	08-01-2024	07-31-2026
713	08-01-2024	07-31-2026

812	08-01-2024	07-31-2026
911	08-01-2024	07-31-2026
1011	08-01-2024	07-31-2026
1111	08-01-2024	07-31-2026
1211	08-01-2024	07-31-2026
1313	08-01-2024	07-31-2026

In 2025 the Housing Authority intends to request HUD approval of Vacancy for Modernization status for four additional efficiency units on 4th floors to facilitate continuation of the unit merger/renovation project in Wood Hill Towers-North.

7. Civil rights certification

A civil rights certification (Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations) will be prepared and submitted in the form required by HUD as part of the Housing Authority’s 2025 Annual Plan.

8. Most recent fiscal year audit

The final independent audit report for 2018 will be attached to and made part of this Annual PHA Plan.

9. Progress report

See section 4.C of this document for a report on the agency’s progress is achieving goals established under the 2015 5-Year Plan. A new set of goals and objectives have been established as part of the 2025 5-Year Plan.

The Housing Authority’s short-term plans, statements, budgets, and policies are all oriented toward achieving the agency’s goals and objectives. Taken as a whole, they outline a comprehensive approach to providing high-quality housing to eligible participants in a cost-effective manner that also promotes self-sufficiency.

10. Resident Advisory Board comments

See section 4.F of this document for a summary of the Resident Advisory Board’s comments on the 2025 Five-Year and Annual Plan.

11. Certification of Consistency with Consolidated Plan

The City of Bloomington prepares and adopts a Consolidated Plan in conformance with federal regulations. Housing Authority staff participate in the process of developing that plan and the annual reports related to the Consolidated Plan. The Housing Authority’s participation in the Consolidated Plan development process ensures that our Annual PHA will be consistent with the broad community development goals included therein.

The standard certification of compliance (Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan) will be submitted as an electronic attachment to the PHA Plan submitted to HUD.

12. Statement of capital improvements

The FY 2025 plan of capital improvements and a generalized five-year plan will be attached hereto and made part of this 2025 Annual PHA Plan. These documents were presented and reviewed at the 10/1/2024 Resident Advisory Board meeting, the 10/3/2024 public hearing, and at the 10/16/2024 Board of Commissioners meeting.