

2026 Five-Year and Annual Public Housing Agency (PHA) Plan
Housing Authority of the County of McLean (MCHA)

EFFECTIVE 7/1/2025

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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 and Economic Recovery Act (HERA), Title VII, Small Public Housing Authorities Paperwork Reduction Act, exempted “qualified PHAs” from the requirement to prepare and submit an annual plan.

For the purposes of this provision, a Qualified PHA is a PHA that has a combined unit total of 550 or less public housing units and section 8 vouchers; and is not designated troubled under section 6(j)(2) of the 1937 Act, the Public Housing Assessment System (PHAS), as a troubled public housing agency during the prior 12 months; and does not have a failing score under the Section 8 Management Assessment Program (SEMAP) during the prior 12 months. The Housing Authority of the County of McLean (also referred to herein as McLean County Housing Authority or MCHA) meets these requirements and is therefore considered a Qualified PHA that is no longer required to submit an annual PHA Plan.

The Housing Authority of the County of McLean adopted its last 5-year plan on April 8, 2020 (Resolution 2020-03), which covers the 5-year period ending June 30, 2025 (fiscal years 2021 through 2025). This document, the Five Year PHA Plan for FY 2026-2030 will also include required elements of an annual plan even though the McLean County Housing Authority is no longer required to submit an annual PHA Plan.

The MCHA has a close relationship with and significant overlap in operations with the Bloomington Housing Authority (BHA). All operations for MCHA are carried out by BHA employees and the housing choice voucher (HCV) program for MCHA is executed in conjunction with the BHA HCV program. With this in mind, the bulk of this plan document is taken directly from the 5-Year Plan for the Bloomington Housing Authority, which was prepared and adopted by that agency in 2025. Any references to programs not operated by MCHA (public housing, capital fund grant, etc.) can be disregarded.

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.

Objective 1.2: Continue to support, expand participation, enhance and empower participant 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 1.3: Expand education of the Homeownership program and support families in achieving homeownership goals.

Objective 1.4: Expand partnerships with community-based organizations

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 all options 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: 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 4: 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 5: 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 2019-2024 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 *BHA Advocate for and participate in efforts to expand affordable housing options in the community.*
 - 3.1 *Proactively seek development partnerships to create new opportunities for affordable housing using tools such as project-based vouchers.*
 - 3.2 *A Evaluate need to revive not-for-profit organization for affordable housing development.*
 - 3.3 *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.

- 4 *Invest in staff training, employee development, and management tools to improve agency operations, foster innovation, and expand staff leadership capacity.*
 - 4.1 *Evaluate key agency processes (e.g. interim rent reviews, public housing move-outs, etc.) to identify opportunities for streamlining.*
 - 4.2 *Prepare staff training and development plan for each position.*
 - 4.3 *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 a 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 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. 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 HOTMA revisions were proposed by staff 10/16/2024 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.

b. STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS

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.

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

As a voucher-only agency, McLean County Housing Authority is not required to develop a Deconcentration Policy. Other policies governing eligibility, selection, and admissions to the housing choice voucher program are found in the Administrative Plan.

d. FINANCIAL RESOURCES

STATEMENT OF FINANCIAL RESOURCES (pending current resources)

The projected financial resources of the Housing Authority of the County of McLean during the plan year (FY 2026) are:

Program	Source	Funds used for	Amount
Housing Assistance	Section 8 HAP renewal funding	Housing assistance payments (HAP) for Section 8 vouchers	\$2,616,773
Administrative Fee	Section 8 housing choice voucher program on-going administrative fees	Administrative expenses to operate housing choice voucher program	\$277,861
TOTAL			\$2,894,634

Participants in McLean County Housing Authority’s housing choice voucher program are eligible to participate in the Family Self-Sufficiency (FSS) Program. Because the FSS grant funds are accounted for through the Housing Authority of the City of Bloomington, the FSS grant funds are not listed in the Statement of Financial Resources shown above.

e. 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.

f. OPERATION AND MANAGEMENT

OPERATION AND MANAGEMENT POLICIES

The primary business of the Housing Authority of the County of McLean (HACM) is providing federal rental assistance to a variety of special users that have in common an inability to compete successfully

for shelter in the open market. The rental assistance provided by HACM is done so in conjunction with the Housing Authority of the City of Bloomington (HACB). To ensure the successful performance of that business, HACM and/or HACB has the following policies that govern operations:

- 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
- Personnel Policy
- Procurement Policy
- Reasonable Accommodation Policy
- Rent Determination Policy
- Travel Policy
- Upfront Income Verification (UIV) System Security Policy
- Violence Against Women Act (VAWA) Plan

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

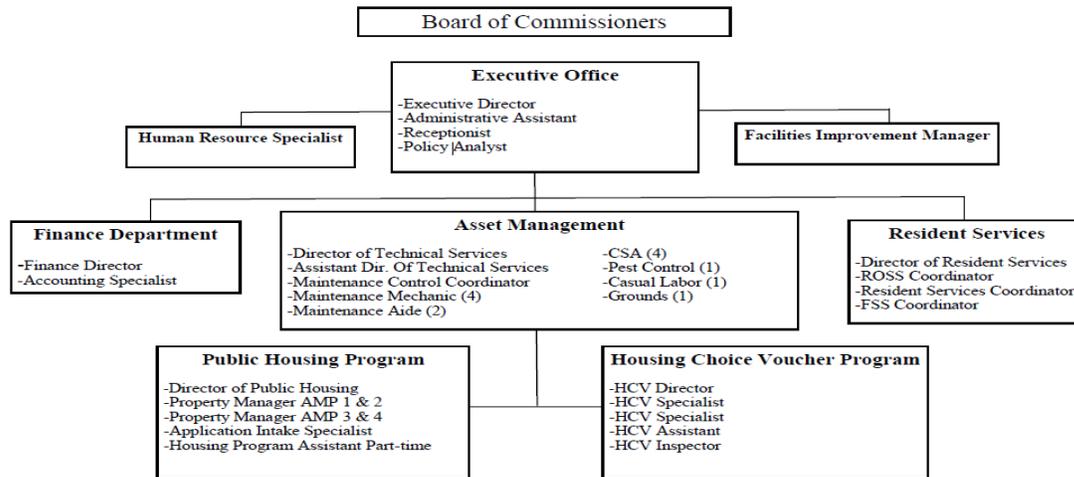
The HACM operates the following programs:

PROGRAM	BRIEF DESCRIPTION
Section 8	316 vouchers.

On behalf of HACM, HACB operates a tenant-based program under the Housing Choice Voucher program. We are authorized to issue up to 458 vouchers through HACB and up to 316 through HACM. Due to federal funding limitations, HACB is only able to assist approximately 675 households in total through the program. On average 50 vouchers in total are surrendered each year and new families are assisted under this program.

To put HCV program management in context, an organizational chart of the Housing Authority of the City of Bloomington is presented below. The HACM has an intergovernmental agreement in effect which has been approved by the Board of Commissioners of the entities. The HACM Board of Commissioners consists of a 5-member board, with one seat required to be a member of a household receiving rental assistance through the program. Commissioners are appointed by the Chairman of the McLean County Board.

HOUSING AUTHORITY OF THE CITY OF BLOOMINGTON



g. GRIEVANCE PROCEDURES

Grievance procedures related to the housing choice voucher program are provided in Chapter 16, Part III of the Administrative Plan. No changes to the policy are proposed at this time.

h. HOMEOWNERSHIP PROGRAMS

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

i. SUBSTANTIAL DEVIATION
j. 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

No specific new activities or programs are anticipated to be undertaken by the Agency.

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 5-Year Plan.

8. Most recent fiscal year audit

The final independent audit report for 2024 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 in achieving goals established under the 2020 5-Year Plan. A new set of goals and objectives have been established as part of the 2026 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 2026 Five-Year and Annual Plan.

11. Certification of Consistency with Consolidated Plan

The City of Bloomington and the Town of Normal prepare and adopt a Consolidated Plan in conformance with federal regulations. Housing Authority staff participates in the process of developing those plans and the annual reports related to the Consolidated Plan. The Housing Authority's participation in the Consolidated Plan development process ensures that our Annual and Five-Year PHA Plans 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.