



U. S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT

FHEO Region V
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard – Room 2101
Chicago, Illinois 60604-3507

Office of Fair Housing and Equal Opportunity

January 21, 2016

VIA ELECTRONIC AND REGULAR MAIL

Andy Clarke, Chairman
Alexander County Housing Authority Board of Commissioners
1100 Ohio Street
Cairo, Illinois 62914

SUBJECT: Alexander County Housing Authority Civil Rights Violations

Dear Mr. Clarke:

This correspondence is an official notification that the Alexander County Housing Authority ("ACHA") is in violation of its civil rights requirements and the Voluntary Compliance Agreement entered into with the Department on August 28, 2015. Specifically, ACHA has failed to remedy the civil rights findings made by the HUD Office of Fair Housing and Equal Opportunity ("FHEO") in a Letter of Findings of Violations of Title VI of the Civil Rights Act of 1964 and its implementing regulations found at 24 C.F.R. Part 1, issued on September 30, 2014.

The August 28, 2015, VCA between ACHA and FHEO was designed to remedy these violations. ACHA has failed to comply with the following provisions of the VCA, which require that ACHA:

- Obtain approval by the FHEO Regional Director, or his designee, prior to tendering a formal employment offer to any Executive Director candidate. (Paragraph 15B)
- Submit a Designated Housing Plan to HUD PIH to properly designate senior / disabled housing at Shoemaker and Connell Smith within 60 days of the effective date of the VCA. (Paragraph 16)
- Canvass eligible families in McBride and Elmwood for interest in joining the "VCA Waitlist," and develop the VCA Waitlist based on the results of the canvass within 60 days of the effective date of the VCA. (Paragraph 13B,C)
- Schedule the Lease Enforcement Manager to visit AMP 1 developments every day, as is practicable within 60 days of the effective date of the VCA. (Paragraph 14B)
- Review maintenance employee assignments and ensure that pay and assignments are equitable within 60 days of the effective date of the VCA. (Paragraph 15F)

As a result of these failures, ACHA is in non-compliance with its obligations under Title VI of the Civil Rights Act and is in violation of the VCA that it entered into with the Department to remedy these violations. Paragraph 21 of the VCA specifically states:

“If at any time while this Agreement is in effect, the Department determines that the Recipient has not made reasonable efforts to comply with this Agreement in a timely fashion, and without obtaining advance written agreement from the FHEO Regional Director or his designee, the Department may attempt to enforce the Agreement and/or initiate proceedings that could result in the denial of federal financial assistance to the Recipient, or any other actions authorized by contractual, statutory, or regulatory remedy available to HUD, including but not limited to the appointment of a third party receiver to administer the operations of Recipient.”

In the coming days, the Department will explore various remedial options, including but not limited to those in the VCA, and/or referral to the U.S. Department of Justice.

If you have any questions, please contact me at (312) 913-8400 or via email at Maurice.J.McGough@hud.gov.

Sincerely,



Maurice J. McGough
FHEO Region V Director
Office of Fair Housing and
Equal Opportunity

Enclosure

CC: Chalen Tatum, Chairman, Alexander County Board of Commissioners
Antonio Riley, Regional Administrator, HUD Region V
Bill Wilkins, Director, HUD Illinois Office of Public and Indian Housing
Jan Elson, Deputy Regional Counsel, HUD Region V