

USDA RD Housing Preservation Grant

Statement of Activities

Christian County Health Department
Christian County, IL

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Requirements:

“The statement of activities must be published for public comment in a print or online newspaper and allow at least 15 days for public comment. The start of the 15-day period must occur no later than 16 days prior to the last day for acceptance of the preapplications by Rural Development, see § 1944.674.”

(i) Program Description

Christian County Health Department is requesting assistance to address ongoing issues associated with aging and malfunctioning septic systems affecting residents in and around the City of Taylorville, Illinois. These issues are primarily concentrated in two areas: the Lake Bertinetti subdivision and the Lincoln Trail Road corridor. The department, which oversees wastewater compliance throughout the county, is seeking funding to assist low-income homeowners with repairing or replacing failing septic systems to help protect public health countywide.

While the City of Taylorville provides comprehensive wastewater collection and conveyance services to most residents, and treatment is provided through the Taylorville Sanitary District, a significant portion of the population remains unserved by centralized sewer infrastructure. Approximately 620 households, representing over 1,000 residents, located within Taylorville, Johnson, and May Townships rely on private septic systems and leach fields for wastewater treatment (Benton & Associates, 2023).

Private septic systems in these areas are highly susceptible to failure due to both environmental and maintenance-related factors. Inadequate maintenance can result in system backups, surface ponding, and potential public health risks. These concerns are heightened by the proximity of the affected areas to key water resources, including Lake Bertinetti, the South Fork of the Sangamon River, and Lake Taylorville. These water bodies are heavily used for recreation, and Lake Taylorville additionally serves as the City’s primary raw water source for drinking water treatment (Benton & Associates, 2023).

The Lake Bertinetti subdivision presents particularly acute challenges. Developed approximately five years ago without access to municipal sewer service, the subdivision relies entirely on individual septic systems. Reports indicate that improper installation of these systems has led to significant failures, including seepage of untreated wastewater into groundwater, visible discharges into the lake, and persistent odors.

The Lincoln Trail Road and Roosevelt Road areas are low-income rural areas located east of the City of Taylorville. Many of the housing units along Lincoln Trail Road have aging septic systems. Nine homes are on record as having received violations, and some residents are citing economic hardship as a reason for not complying with the county order to upgrade their septic system.

The City of Taylorville has evaluated the feasibility of extending sewer service to unserved communities along its borders (Benton & Associates, 2023). However, due to financial, zoning, and political

constraints, such expansion is not currently viable, and wastewater solutions for these areas are not being actively pursued.

(ii) Recipient Selection Process

Christian County Health Department proposes to operate a low-income homeowner assistance grant program to repair and replace deficient septic systems under the USDA Rural Development (USDA-RD) Housing Preservation Grant (HPG) program in the Lincoln Trail Road area, Lake Bertinettis Subdivision within May Township, and small rural areas in Christian County, Illinois. Assistance will be used to correct health and safety deficiencies associated with failing or inadequate septic systems, including the repair or replacement of septic systems, related appurtenances, and other eligible improvements necessary to restore safe and sanitary living conditions. Where the condition of the dwelling indicates that repair is not economically feasible, the department will evaluate the property for replacement housing in accordance with applicable program requirements.

Recipients for HPG assistance will be selected through a documented intake eligibility review and prioritization process designed to ensure fair and consistent assistance to eligible households. The department will conduct outreach throughout the proposed service area and accept applications from interested homeowners. Each applicant will be screened to verify owner occupancy, household income eligibility, property location, and the existence of a failing, failed, or imminently failing septic system that constitutes a health, safety, sanitation, or code compliance concern. Assistance will be provided without discrimination and in accordance with applicable equal opportunity requirements. When demand exceeds available funding, the applicant will prioritize households based on household income, the severity of the septic system failure, the degree of threat to health and safety, household vulnerability, and readiness to proceed with corrective work.

For each selected recipient, the department will determine the housing preservation needs of the dwelling through an inspection and work write-up process performed by qualified technical professionals. The assessment will document site conditions, identify the nature and extent of septic system failure, review any visible housing deficiencies affecting habitability or sanitary function, and determine the corrective action necessary to bring the property to an acceptable standard. The department will coordinate internally and with licensed septic professionals to confirm code, siting, and permitting requirements. Each recipient file will include a written scope of work, cost estimate, and supporting documentation sufficient to justify the assistance provided.

The necessary work will be performed in accordance with the approved scope of work, applicable local codes, health department requirements, and the development standards adopted for the program. Prior to the obligation of funds, the department will complete required environmental and historic preservation review steps in accordance with program requirements. The department will require the contractor to obtain all permits and approvals required for septic repair or replacement activities. Work will be carried out by qualified and properly licensed contractors, installers, or other technical service providers selected in accordance with the department's procurement and contractor selection procedures. Written agreements will define the scope, price, schedule, inspection requirements, and

conditions for payment (cost reimbursement), including correction of deficiencies prior to final acceptance.

The department will monitor and inspect work performed through a documented system of pre-construction review, progress inspections, and will review a final inspection performed by a third-party contractor prior to release of final payment. Monitoring activities will verify that the work is completed in accordance with the approved scope, applicable permits, adopted development standards, and all other program requirements. The department will coordinate with a third-party inspector for required inspections and approvals and will document any deficiencies requiring correction before work is accepted. Final recipient files will include eligibility documentation, inspection records, permits, invoices, contractor certifications, photographs when available, homeowner acceptance, and other records necessary to demonstrate proper completion and oversight of the assistance. The department will maintain these records to support grant administration, reporting, and any required long-term monitoring.

(iii) Identification of Environmental Impacts

Christian County Health Department has submitted a letter of inquiry to the Illinois State Historic Preservation Office (SHPO) to inform them of our application for HPG funds. We have asked SHPO to provide procedures we must follow to ensure that the proposed activities abide by SHPO rules. A copy of the response will be forwarded to the USDA-RD office upon receipt. The department has completed form 1970-A Exhibit H Multi-tier Action Environmental Compliance Agreement. A copy of the letter sent to SHPO from the department will be included with the Environmental Compliance Agreement.

The department will use a standardized environmental screening process for all properties considered for septic system repair or replacement assistance under the HPG in the proposed service area. Consistent with *7 CFR 1944.672* and *7 CFR part 1970*, the department will complete pre-award environmental documentation for the geographic area proposed to be served and will maintain a property-level review procedure to identify any dwelling or site that may require additional environmental review before assistance is approved. For each property under consideration, staff will document the property address, the condition of the existing septic system, the proposed scope of repair or replacement work, whether the work will occur on the same site, the location of the proposed tank and dispersal field, current site conditions, and any known environmental constraints.

The review will specifically identify whether the dwelling or proposed septic work area is located in a floodplain or wetland, whether the proposed excavation or replacement activity could affect a historic property or archeological resource, and whether any other site condition indicates that an environmental assessment may be required. If the screening shows that the dwelling and proposed septic work area are not in a floodplain or wetland and that the proposed work is concurred in under the historic-preservation process, the department will document compliance in the recipient file and proceed in accordance with program requirements. If the screening identifies a potential environmental concern, off-site impacts, or any circumstance requiring a higher level of review, the department will immediately notify the appropriate USDA-RD staff and will not approve assistance for

that property until USDA-RD completes the required environmental review in accordance with *7 CFR part 1970*.

To comply with *7 CFR 1944.673(b)* and Stipulation I, A–G of the PMOA in *RD Instruction 2000–FF*, the Christian County Health Department will use a documented procedure for identifying and addressing properties where septic system repair or replacement activities may affect a property listed in, or eligible for listing in, the National Register of Historic Places. As part of intake and project development, the department will collect the age of the dwelling, photographs of the structure and proposed work area, parcel and location information, and a description of the proposed septic repair or replacement work, including any excavation, trenching, tank removal, installation of new tanks, pumps, lines, or leach fields, and whether work will occur within previously disturbed ground or require expansion into new areas of the site.

When a property appears to be historic or potentially historic, or when the proposed septic work may affect historic characteristics or involve ground disturbance in areas that have not been previously disturbed, the department will consult with SHPO and provide the information necessary for review before work is authorized. No septic repair, replacement, excavation, trenching, demolition, installation, or other site-disturbing activity will begin on a property subject to historic-preservation review until the required concurrence or other direction has been received. The department will maintain copies of correspondence, determinations, and any required conditions in the recipient file and will ensure that contractors and homeowners are informed of any restrictions or mitigation measures associated with the work.

If USDA-RD determines that it must assume responsibility for compliance with *36 CFR part 800* under the PMOA, the department will assist USDA-RD by supplying property information, photographs, site plots, system layout information, work write-ups, and other documentation needed to support the review and any environmental assessment, and it will defer all work on the affected property until USDA-RD authorizes the project to proceed.

(iv) Development Standards

Christian County Health Department will follow these codes for all construction: Illinois Accessibility Code; 2021 International Property Maintenance Code for One and Two Family Dwelling; 2021 International Residential Code for one and two Family Dwellings; current State of Illinois Plumbing Code; 2023 National Electrical Code; 2024 National Fuel Gas Code; Illinois Private Sewage Disposal Act; 2002 Water Well Drilling Act; Illinois Carbon Monoxide Detector Alarm Act; 2023 International Energy Conservation Code; and Illinois Poisoning Prevention Act & Code. All code and acts are on file at the Christian County Health Department Office.

(v) Time Schedule

The proposed septic system rehabilitation and replacement program will be implemented over a 12-month grant period within Christian County, Illinois, targeting low- and very low-income households

lacking adequate wastewater infrastructure. The timeline is structured to ensure efficient deployment, regulatory compliance, and measurable public health impact.

Quarter 1 (Months 1–3): Program Initiation and Outreach

During the initial phase, the department will finalize program protocols, eligibility criteria, and internal workflows. Outreach efforts will be conducted to identify eligible households through coordination with local partners, including township officials, social service agencies, and existing Environmental Health records. Applications will be accepted, reviewed, and prioritized based on public health risk and financial need.

Quarter 2 (Months 4–6): Site Assessments and Project Planning

Environmental Health staff will conduct site evaluations, soil testing (as required), and system failure verification. Project scopes will be developed for each approved household, including cost estimates and contractor specifications. Required permits and regulatory approvals will be secured in accordance with applicable Illinois private sewage disposal regulations.

Quarter 3 (Months 7–9): System Replacement and Installation

Approved septic system replacement projects will be initiated and completed during this phase. Work will be performed by licensed contractors, with ongoing inspection and oversight provided by Environmental Health staff to ensure compliance with all applicable codes and standards.

Quarter 4 (Months 10–12): Final Inspections, Closeout, and Reporting

Final inspections will be conducted to verify proper installation and functionality of all systems. The program will complete financial reconciliation, data collection, and outcome evaluation. Required reports will be submitted to USDA-RD in accordance with HPG requirements.

(vi) Staffing

The program will be implemented utilizing existing, experienced staff within the Environmental Health Division of the Christian County Health Department. This approach ensures cost efficiency while leveraging established expertise in septic system regulation and inspection.

Joe Torres, the Director of Environmental Health, and Jacob Christner, Environmental Inspectors, each have over two years of experience in septic system inspection and regulatory oversight. These staff will be responsible for:

- Conducting site evaluations and system failure determinations
- Reviewing applications and verifying eligibility criteria
- Coordinating permitting and regulatory compliance activities
- Providing construction oversight and performing required inspections
- Ensuring adherence to Illinois private sewage disposal regulations

The Public Health Administrator, Dr. Chad Anderson, and administrative support staff will provide program oversight, including:

- Grant management and compliance monitoring
- Financial tracking and reporting
- Coordination with contractors and external partners
- Preparation and submission of required reports

The Christian County Health Department team has several years of experience administering federal grants, serving low- and very low-income households through the lead service grant program it manages. The team also has more than a year of experience overseeing weatherization and rehabilitation projects and will engage contractors with demonstrated expertise in septic system repair and replacement within the County.

No additional staffing is anticipated for the initial program year.

(vii) Recipient Income Demographics

The Christian County Health Department intends to provide 100 percent of HPG funds to very-low and low-income minority and nonminority persons. The department will prioritize very low-income applicants in their grant recipient selection process. Considering the estimated cost of a replacement septic tank is \$30,000 - \$40,000, and repairs estimated between \$5,000-\$25,000, the department anticipates assisting three-four very-low or low-income households with septic system repair and/or replacement with HPG funds. The department will ensure that 65 percent of grant recipients are very low-income and 35 percent of grant recipients are low-income based on USDA-RD single family housing income limits¹.

(viii) Geographic Areas

Eligible recipients of this HPG program include homeowners in rural areas and towns with 20,000 or fewer people in Christian County. Homeowners in Lincoln Trail Road area and Lake Bertinettis Subdivision within May Township, Christian County will be prioritized for grants based on income due to the known urgency of existing septic failure issues in these areas. Priority areas are shown in Figure 1 and Figure 2. These geographies are located in USDA-RD eligible areas² as demonstrated in Figure 3, Figure 4, and Figure 5 .

¹ <https://www.rd.usda.gov/sites/default/files/RD-DirectLimitMap.pdf>

² <https://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do>

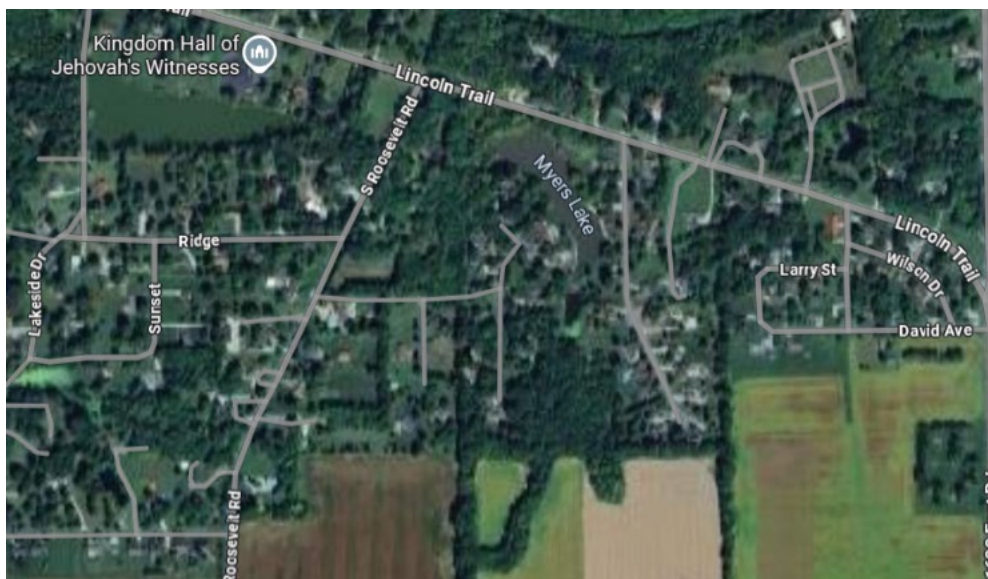


Figure 1. Lincoln Trail Road area



Figure 2. Lake Bertinettis Subdivision

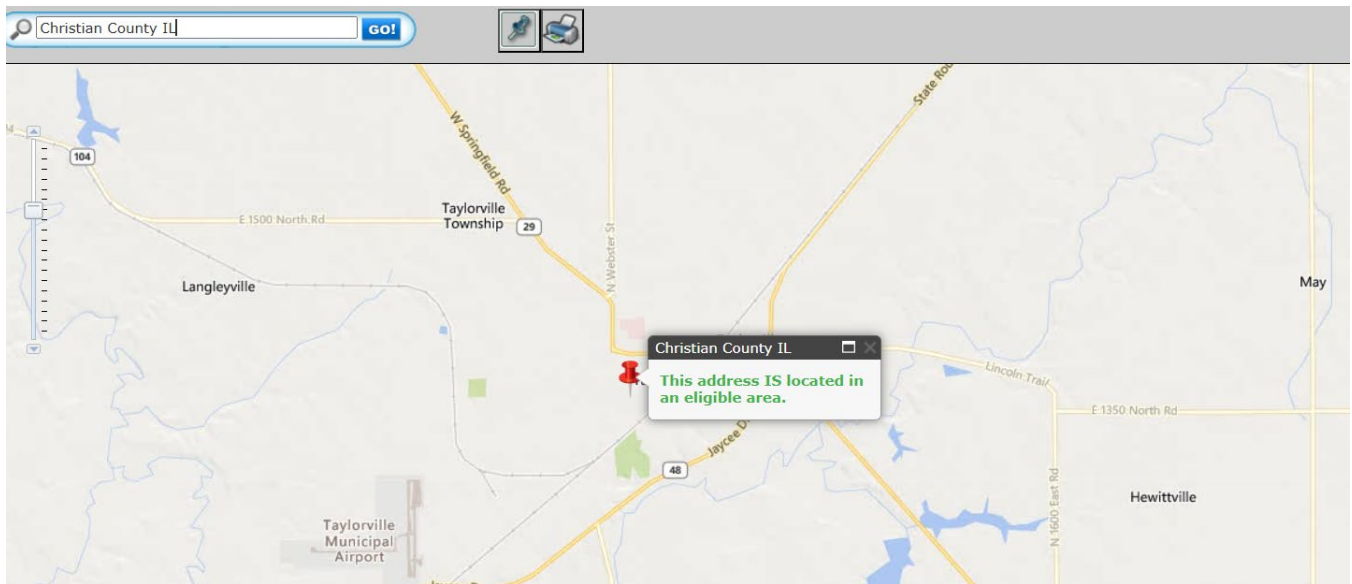


Figure 3. Christian County USDA-RD geographic eligibility check

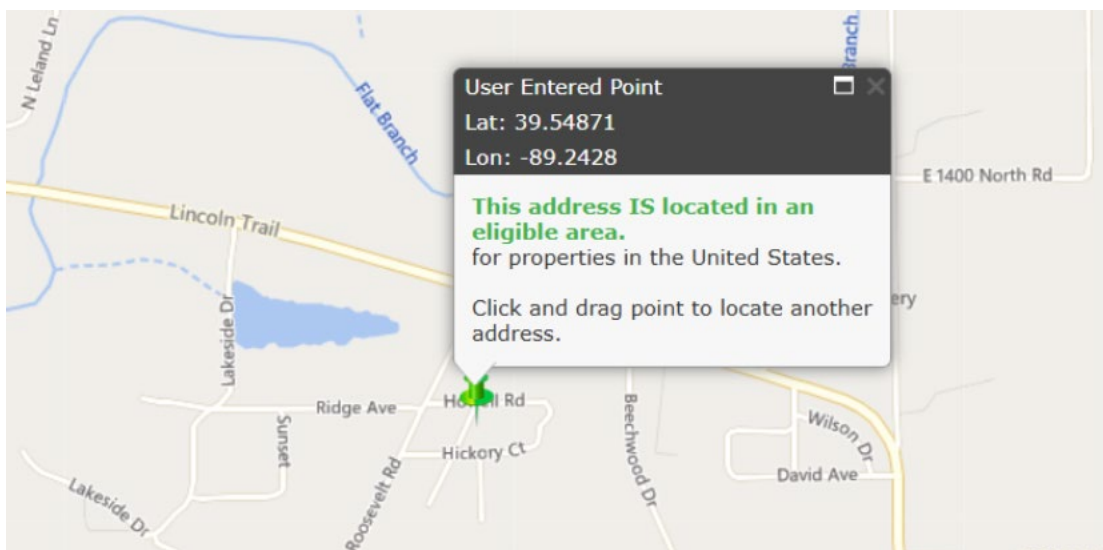


Figure 4. Lincoln Trail Road area USDA-RD geographic eligibility check.

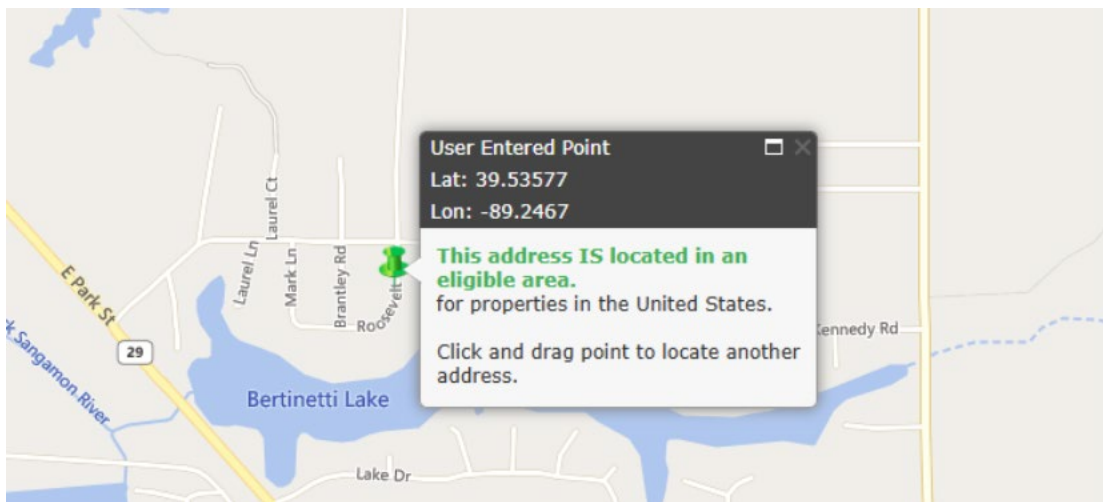


Figure 5. Lake Bertinettis Subdivision USDA-RD geographic eligibility check

(ix) Program Budget

A total of \$54,948 is being requested. Administrative expenses will be capped at 15%, and all remaining funds will be applied toward septic repair and replacement costs.

(x) Cost Proposal

The Christian County Health Department currently utilizes a standard indirect cost allocation methodology consistent with federal grant requirements. In the absence of a federally negotiated indirect cost rate, the department proposes to apply an indirect cost rate of 10 percent of modified total direct costs, in accordance with federal guidelines.

(xi) Accounting System

The Christian County Health Department utilizes QuickBooks as its primary financial management and accounting system.

(xii) Method of Evaluation

The Christian County Health Department will evaluate the effectiveness of its septic system repair and replacement program by measuring whether HPG funds are used in a timely, eligible, and cost-effective manner to correct health and safety hazards for up to four low-income households in the proposed service area. Effectiveness will be determined by comparing actual results during each reporting period to the program objectives established in the grant application and statement of activities, with particular emphasis on the number of eligible households assisted, the completion of septic repairs or replacements that restore safe and functional wastewater disposal, compliance with environmental and historic preservation requirements, and the average cost of assistance per household.

For each assisted household, the department will maintain a case file and tracking log documenting applicant eligibility, household income, property address, scope of work, contractor procurement and inspection records, sources and uses of funds, and the dates of application approval, construction start, construction completion, and final inspection. The department will also document whether the activity involves repair of an existing septic system or full replacement, the principal deficiencies corrected, and whether the completed work eliminated the identified wastewater disposal hazard. Program staff will review these files at least quarterly to assess progress, identify delays or cost overruns, and determine whether corrective action is needed to meet grant objectives.

Quarterly performance evaluation will be tied directly to the reports submitted to USDA-RD. In accordance with 7 CFR 1944.683(b), each quarterly performance report will relate activities during the reporting period to the project objectives and analyze program effectiveness. At a minimum, the department's quarterly report will address: (1) the use of HPG funds for administration and housing preservation activities; (2) for each dwelling assisted, the homeowner's name, address, and income, or if applicable the owner or cooperative name and address for a rental property or co-op, the total cost of repair or rehabilitation, a description of the major septic-related repairs made, the amount financed with HPG funds, the amount financed from other sources, the type of assistance provided, and the results of the environmental and historic preservation review processes; (3) the use of HPG and other funds for any replacement housing, if applicable; (4) a comparison of actual accomplishments with projected accomplishments for the period, including the number of very low- and low-income households assisted, the number of minority and nonminority persons assisted, and the average amount of assistance provided per household; and (5) an explanation of any objectives not met during the reporting period and the steps to be taken to bring the program back on schedule.

To measure effectiveness, the department will use both output and outcome indicators. Output indicators will include the number of applications received, the number of households determined eligible, the number of septic repair or replacement projects approved, the number of projects completed, the total amount of HPG funds obligated and expended, and the average amount of assistance per household. Outcome indicators will include whether each completed project corrected the identified septic system failure, whether the dwelling was left with a safe and operable wastewater disposal system, whether the household was able to remain in decent, safe and sanitary housing, and whether the work was completed within the grant term and budget.

The department will consider the program effective if it assists up to four eligible households as proposed, completes eligible septic improvements in compliance with applicable standards and regulations, and demonstrates that funded activities resolved identified health and sanitation deficiencies.

The department's internal monitoring process will include review of invoices, inspection reports, beneficiary eligibility records, and expenditure records before each quarterly submission. The Program Director or designee will compare cumulative accomplishments against the implementation schedule and budget, verify that administrative costs remain allowable, and confirm that all required supporting documentation is available for USDA-RD review. If performance lags behind schedule, if costs exceed

estimates, or if a project becomes infeasible, the department will document the reason, revise work plans as needed, and report the issue and proposed corrective action in the next quarterly report.

When the program involves a rental property or cooperative, the department will also carry out long-term monitoring in accordance with 7 CFR 1944.689. This monitoring will occur at least annually and will include review of all applicable requirements in 7 CFR 1944.663, all terms of the ownership agreement executed between the department and the rental property owner or cooperative, and all applicable requirements under 2 CFR part 200 as adopted by USDA through 2 CFR part 400 during the effective period of the grant agreement. The department will maintain separate files for each assisted rental property owner or cooperative and preserve those records for at least three years after termination of the ownership agreement.

For rental properties and cooperatives, the annual monitoring review will verify that the assisted units continue to be used in accordance with program requirements, that any affordability or occupancy commitments in the ownership agreement remain in effect, that required records are current and complete, and that the owner or cooperative remains in compliance with all obligations associated with the HPG assistance. The department will make monitoring information available to USDA-RD upon request and will submit an annual report to USDA-RD within 15 days after the anniversary date or end of the grant agreement, as applicable, stating at a minimum that the Department is in compliance with the requirements of this subpart. If the proposed program serves only owner-occupied units, this rental/cooperative monitoring procedure will be retained as a contingent compliance protocol to be implemented only if assistance is later extended to an eligible rental property or cooperative in accordance with program rules. This method of evaluation will enable the department to monitor program implementation on an ongoing basis, demonstrate compliance with federal requirements, and provide USDA-RD with a clear record of progress and outcomes achieved through the HPG funded septic system repair and replacement program.

(xiii) Other financial resources

Christian County will use its own budget for completing activities such as staff compensation and accounting.

(xiv) Program Income

The program will provide grants to homeowners. There will be no program income.

(xv) Disposition of Security

There will be no security instruments held as a result of HPG activities.

(xvi) Additional information

(xvii) Outreach Efforts

The Christian County Health Department will implement a comprehensive outreach strategy to ensure that information about the HPG program reaches all segments of the service area, including minority populations and traditionally underserved communities. The department adheres to the Fair Housing requirements and the nondiscrimination requirements of the Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975. The department will follow recommendations outline in Exhibit H to document grant recipient eligibility and selection. The department will target very low and low-income families for HPG funding. Public outreach will include newspaper and website announcements, social media posts, emails to agencies and community groups within the county's low-income areas, and community meetings as needed. The department will also set up a funding program webpage for interested homeowners to access program information and application materials.

References

Benton & Associates, Inc. (2023, January). *City of Taylorville unsewered communities planning report*.