

**Members of the St. Cloud HRA Board of Commissioners will participate
by ZOOM meeting rather than in-person**

Members of the public who desire to give input or testimony regarding an item
on the agenda may do so no later than 3:00 p.m. December 16, 2020.

Email at: lreis@stcloudhra.com

Phone: 320-202-3145

**REGULAR MEETING OF THE
ST. CLOUD HRA BOARD OF COMMISSIONERS**

**Wednesday, December 16, 2020
6:00 p.m.**

Audit Committee ONLY Meeting - 5:00 P.M.

**Chair Nancy Gohman will preside over the meeting
from the St. Cloud HRA Boardroom, 1225 W. St. Germain Street**

Mission Statement: To enhance the communities we serve by providing
housing opportunities, fostering stability, and promoting neighborhood revitalization.

Regular Meeting Agenda:

1. Roll Call and Pledge of Allegiance.

Consent Agenda:

2. Approval of Agenda. REQUESTED ACTION: Approve.
3. Approval of Study Session Minutes, October 28, 2020. REQUESTED ACTION: Approve.
4. Approval of Regular Minutes, October 28, 2020. REQUESTED ACTION: Approve.
5. Review of Financials: Public Housing Fund (operating statements by AMP), Germain Towers Fund, Northway Projects A&B Fund, and Eastwood Apartments Fund.
REQUESTED ACTION: NONE.
6. Approval of Contracts for Flooring Installation Services. REQUESTED ACTION: Approve.
7. Set Date for Public Hearing for Updates to Agency Plan. REQUESTED ACTION: Approve.

Open Forum: At this time members of the public may address the Board with questions, concerns, or comments (regarding an item NOT on the agenda). Citizens are asked to sign up to speak prior to the Open Forum portion of the meeting. Speakers will be limited to the first five citizens who sign up. The Board members will not ask questions of the speakers, but rather refer the matter to the Administration with a request for a follow-up report. A citizen may speak at the Open Forum only twice during the year. Open Forum is limited to a total of 10 minutes. TIME LIMIT IS 2 MINUTES PER PERSON.

Old Business: None.

New Business:

8. Approval of Resolution 2020 – 11 - CDBG Application for 2021.
9. Approval of Resolution 2020- 12 - Authorizing Participation in the Minnesota City Participation Program (MCP) for 2021.
10. Approval of Contract with IntelCONNECT.
11. Approval of Caretaker Compensation Policy.
12. Approval of Extension of Waivers Granted by the Department of Housing & Urban Development for Housing Authorities Under COVID 19.
13. Approval of Extending Expiration Date of Personnel Policies 05.18 and 05.19.
14. Report on Activities.

Open Discussion:

Adjourn.

2020/21 HRA Board Meeting Schedule - 4th Wednesday each month at 6:00 pm; early meetings as needed at 5:00. Note: November and December moved forward one week to accommodate holidays. Calendar for 2021 will be scheduled for approval at the January 27th Annual Meeting.

DECEMBER 2020						
SUN	MON	TUE	WED	THU	FRI	SAT
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

2021 January						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	15
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

**ST. CLOUD HOUSING & REDEVELOPMENT AUTHORITY
STUDY SESSION**

Wednesday, October 28, 2020

A Study Session for the St. Cloud HRA Board of Commissioners was held on Wednesday, October 28, 2020, St. Cloud HRA Boardroom, 122 W. St. Germain St, St. Cloud, MN. Chair Nancy Gohman called the meeting to order at 5:00 p.m. Commissioners present either in person or via teleconference: Mike Conway, Abdi Daisane, Jeff Goerger, Nancy Gohman, Seal Dwyer and George Hontos. Absent: None. The Board has one vacancy. Staff present either in person or via teleconference: Executive Director Louise Reis, Finance Director Karen Rizer, Project Manager Paul Rizer, Voucher Programs Manager, Lori Lygre and Neighborhood Program Assistant, Shannon Adamski.

Agenda: Budgets and Operations Update.

Ms. Rizer presented each budget to the Board beginning by referring Board members to Tab 6 of the Regular Agenda packet for reviewal of each individual budget. She started with the Central Office Cost Center (COCC) Fund. She stated there were no changes since the July meeting.

Ms. Rizer moved on to the Housing Choice Voucher (HCV) Fund. She stated there was a change to the Revenue due to the Cares Act. Those funds can only be recognized as revenue as it applied to costs, they cannot show as a profit. Any funds not spent will need to be returned to HUD. There was a short discussion regarding the number of vouchers issued that was listed in the narrative and how those numbers are managed.

Ms. Rizer referred next to the Public Housing budget; Empire, Scattered Sites and Wilson. The budget is similar to prior years. Ms. Rizer said we are doing some capital improvement projects, such as digital signage, to cover spending down reserve funds. These improvements must be done by December 31, 2021 so we don't have any reserves in risk of recapture.

Next budgets discussed were Germain Towers, Grace McDowall and Northway Townhomes. Commissioner Goerger asked if the buildings will show a profit with the debt being paid off and if so are there limits on what the profits can be used for. Ms. Rizer responded that Northway will begin showing a profit but Germain Towers will not quite yet. The profits can only be used for the properties themselves and cannot be moved to the Community Housing Fund.

Ms. Rizer continued going through each budget. Commissioner Hontos asked if in the future we could put the year built next to the property names to help understand what maintenance items and costs may be coming up.

Chair Hontos asked why there has been a big increase the last few years in the Agency's health insurance. Ms. Rizer explained that is based on the market place and how we are rated. The Agency received pricing from all major carriers and reviews the plans, Health Partners has been the least expensive over the past few years.

Chair Gohman thanked Ms. Rizer for her continued work in presenting each year the budgets and thanked Ms. Rizer and Ms. Reis for the excellent work they do, not only setting the budgets, but in explaining all of their complexities.

Ms. Reis gave an update on operations and how staff were adjusting to the current COVID situation in the community.

There being no questions, the meeting adjourned at 5:40 p.m.

ATTEST:

Secretary, George Hontos

Chair, Nancy Gohman

**ST. CLOUD HOUSING & REDEVELOPMENT AUTHORITY
REGULAR MEETING**

Wednesday, October 28, 2020

A Regular Meeting for the St. Cloud HRA Board of Commissioners was held on Wednesday, October 28, 2020, St. Cloud HRA Boardroom, 1225 W. St. Germain St, St. Cloud, MN. Chair Nancy Gohman called the meeting to order at 5:41 p.m.

1. Roll call was taken and the pledge of allegiance spoken. Commissioners present: Seal Dwyer, Nancy Gohman, George Hontos, Jeff Goerger, Mike Conway, Abdi Daisane. Absent: none. [The board has one vacancy.] Commissioner Goerger abstained from the minutes since he was not at the meeting.
2. Approval of Agenda – Commissioner Dwyer moved for approval of the consent items and agenda; Commissioner Conway seconded the motion. The motion carried.
3. Approval of Study Session Minutes, September 23, 2020 – approved as presented.
4. Approval of Regular Minutes, September 23, 2020 – approved as presented.
5. Review of Financials: Central Office Cost Center Fund, Housing Choice Vouchers Fund, CDBG Housing Rehab Fund, Community Housing Fund, and Housing Development & Rehab Fund – no action requested.

Open Forum: Chair Gohman asked Louise Reis if any member of the public had requested to speak; there was no one wishing to speak.

Old Business: none.

New Business:

6. Approval of Resolution 2020-10 – Operating Budgets for 2021 - Commissioner Goerger moved for approval; Commissioner Dwyer seconded the motion. All Commissioners voted in favor; the motion carried.
7. Approval of 2021 Payment Standards for the Housing Choice Voucher Program: Commissioner Dwyer moved for approval; Commissioner Goerger seconded the motion. All Commissioners voted in favor; the motion carried.
8. Project Manager Paul Soenneker updated the Board on the 19th Avenue lots. The Phase One for the project has been updated. There is concern regarding vapor intrusion with two single family homes; there is no concern for the commercial property. It appears we will need to drill two wells during two different seasons to test for vapor intrusion. Commission Hontos asked approximately how much this will cost and how will it get paid for. Mr. Soenneker responded that he estimated a cost of \$10,000. Ms. Rizer stated that the funds will come from reserves in the Housing Development Fund.
9. Report on Activities – Ms. Reis state that the HUD Audit has was completed. Chair Gohman was on the final call with the auditors and they will notify us of any findings in December. Chair Gohman commented that she found the process interesting how it was done remotely. She didn't feel there were significant findings, however one issue that she feels will be brought up is that there is not a seventh member on the

Board. Chair Gohman encouraged other Board members, particularly members who are also Council members to discuss this with the Mayor.

Open Discussion: none.

There being no further business the meeting adjourned at 6:05 p.m.

ATTEST:

Secretary, George Hontos

Chair, Nancy Gohman

TO: HRA Board of Commissioners
FROM: Karen Rizer, CPA Finance Director
DATE: December 9, 2020
SUBJECT: 2020 Financial Reports

Requested Action: None.

Background: The Board receives financial reports for certain funds on a rotating basis.

The planned reporting schedule is as follows:

June – Central Office Cost Center Fund, Housing Choice Vouchers Fund, CDBG Housing Rehab Fund, Community Housing Fund, Housing Development & Rehab Fund, Public Housing Fund (operating statements by AMP), Germain Towers Fund, Northway Projects A&B Fund, Eastwood Apartments Fund, Al Loehr Apartments Fund, and the seven tax credit limited partnership funds.

July and October – Central Office Cost Center Fund, Housing Choice Vouchers Fund, CDBG Housing Rehab Fund, Community Housing Fund, and Housing Development & Rehab Fund.

August and November – Al Loehr Apartments Fund and the seven tax credit limited partnership funds.

September and December – Public Housing Fund (operating statements by AMP), Germain Towers Fund, Northway Projects A&B Fund, and Eastwood Apartments Fund.

Comment for all properties: Protective Services is under budget because since March, the HRA's dedicated police officer has been put on other duty due to the department changing operating procedures due to COVID-19 and other issues.

If you have any questions about the financial statements, it is helpful if you call or email prior to the meeting in case I need to research your question. (202-3148 or krizer@stcloudhra.com) Thank you.

**St. Cloud HRA
Public Housing Fund 441, 442, 443
Balance Sheet
October 31, 2020**

Assets	
Cash & Investments	\$ 288,822
Accounts Receivable (Net of Allowance)	45,658
Due From Governments - Other	30,734
Interest Receivable	913
Tenant Security Deposits	94,107
Prepaid Insurance and Expenses	21,587
Land & Land Improvements	1,701,929
Furniture & Equipment	340,132
Buildings	18,500,756
Accumulated Depreciation	(15,449,120)
Construction In Progress	497,856
Total Assets	\$ 6,073,374
Liabilities & Net Assets	
Accounts Payable	\$ 74,304
Due To Other Governments	31,333
Accrued Wages & Benefits	8,733
Accrued Compensated Absences	4,540
Tenant Security Deposit & Interest Payable	94,353
Prepaid Rents	25,493
Total Liabilities	\$ 238,756
Net Assets	\$ 5,834,618
Total Liabilities & Net Assets	\$ 6,073,374

Operating Statement

Date:

October 31, 2020

Empire Apartments (Public Housing)			
54 4 Ave N		Budgeted Vacancy Loss	2%
Number of Units	89	Vacancy Loss YTD	2.6%

	Account Title	Annual Budget	YTD Budget	YTD Actual	YTD Budget vs. Actual Var. \$	YTD Budget vs. Actual Var. %
Operating Income:						
1	Gross Potential Rent	\$ 289,300	\$ 241,083	\$ 226,952	\$ (14,131)	-5.9%
2	Less: Vacancy Loss	(5,800)	(4,833)	(5,832)	(999)	-20.7%
3	Net Tenant Rental Revenue	283,500	236,250	221,120	(15,130)	-6.4%
4	Gross Potential Subsidy	173,900	144,917	132,573	(12,344)	-8.5%
5	Less: Subsidy Loss - Proration	(17,400)	(14,500)	(8,889)	5,611	38.7%
6	Net Operating Subsidy	156,500	130,417	123,684	(6,733)	-5.2%
7	HUD PHA Operating Grant - CFP	56,900	47,417	28,900	(18,517)	-39.1%
8	Other Income	28,700	23,917	18,519	(5,398)	-22.6%
	Total Operating Income	525,600	438,001	392,223	(45,778)	-10.5%

Operating Expenses:

Administrative						
9	Administrative Salaries & Benefits	109,000	90,833	65,005	25,828	28.4%
10	Management & Bkpg Fees - Operations	75,200	62,667	66,273	(3,606)	-5.8%
11	Management Fees - CFP	19,000	15,833	28,900	(13,067)	-82.5%
12	Auditing Fees	3,400	3,400	2,891	509	15.0%
13	Legal Expense	7,000	5,833	2,738	3,095	53.1%
14	Travel & Training	4,000	3,333	540	2,793	83.8%
15	Other Administrative Costs	19,800	16,500	22,939	(6,439)	-39.0%
16	Other Administrative Costs - CFP	-	-	-	-	0.0%
17	Total Administrative	237,400	198,399	189,286	9,113	4.6%
18	Asset Management Fees	10,560	-	-	-	0.0%
19	Tenant Services	2,200	1,833	4,289	(2,456)	-134.0%
Utilities						
20	Water & Sewer	23,000	19,167	17,563	1,604	8.4%
21	Electricity	46,000	38,333	35,061	3,272	8.5%
22	Gas	24,000	20,000	11,913	8,087	40.4%
23	Total Utilities	93,000	77,500	64,537	12,963	16.7%
24	Maintenance	200,840	167,367	206,261	(38,894)	-23.2%
25	Protective Services	18,200	15,167	10,937	4,230	27.9%
26	Insurance Expense	16,300	13,583	14,010	(427)	-3.1%
27	Payments in Lieu of Taxes	11,100	9,250	9,550	(300)	-3.2%
28	Bad Debt-Tenants	6,000	5,000	2,084	2,916	58.3%

29	Total Operating Expenses	595,600	488,099	500,954	(12,855)	-2.6%
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30	Cash Flow from Operations	(70,000)	(50,098)	(108,731)	(58,633)	-117.0%
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Other Financial Items-Sources & (Uses)						
31	HUD Grants - CFP	200,000	166,667	73,092	(93,575)	-56.1%
32	Capital Expenditures	(200,000)	(166,667)	(170,497)	(3,830)	2.3%
33	Other Financial Items - Sources & (Uses)	-	-	11,574	11,574	0.0%
34	Total Other Financial Items	-	-	(85,831)	(85,831)	0.0%

35	Net Cash Flow	\$ (70,000)	\$ (50,098)	\$ (194,562)	\$ (144,464)	-288.4%
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For all Public Housing Operating Statements:

Lines 4 and 5 always have the potential to differ from budget because we adopt the budget in Nov/Dec and don't usually know these numbers until April/May of the next year.

Lines 7, 11, 16, 31, and 32 - This amount can vary from the budget because we may decide to draw the funds at a different AMP. Additionally, the amounts typically aren't earned/spent uniformly during the year.

Lines 31 and 32 - Typically there would be HUD CFP Grant revenue in line 31 to offset the capital expenditures in line 32. But because of COVID-19, HUD is allowing operating reserves to be used for capital projects through 12/31/21. Therefore, we are using this opportunity to spend down those reserves to prevent future recapture of excess reserves.

Operating Statement

Date:

October 31, 2020

Scattered Sites & Townhomes (Public Housing)			
Various		Budgeted Vacancy Loss	2%
Number of Units	76	Vacancy Loss YTD	1.0%

	Account Title	Annual Budget	YTD Budget	YTD Actual	YTD Budget vs. Actual Var. \$	YTD Budget vs. Actual Var. %
Operating Income:						
1	Gross Potential Rent	\$ 278,200	\$ 231,833	\$ 248,905	\$ 17,072	7.4%
2	Less: Vacancy Loss	(5,600)	(4,667)	(2,428)	2,239	48.0%
3	Net Tenant Rental Revenue	272,600	227,166	246,477	19,311	8.5%
4	Gross Potential Subsidy	128,900	107,417	119,839	12,422	11.6%
5	Less: Subsidy Loss - Proration	(12,900)	(10,750)	(8,037)	2,713	25.2%
6	Net Operating Subsidy	116,000	96,667	111,802	15,135	15.7%
7	HUD PHA Operating Grant - CFP	48,700	40,583	224,680	184,097	453.6%
8	Other Income	63,000	52,500	59,434	6,934	13.2%
	Total Operating Income	500,300	416,916	642,393	225,477	54.1%

Operating Expenses:

	Administrative					
9	Administrative Salaries & Benefits	93,000	77,500	70,239	7,261	9.4%
10	Management & Bkpg Fees- Operations	64,900	54,083	56,806	(2,723)	-5.0%
11	Management Fees - CFP	16,300	13,583	24,680	(11,097)	-81.7%
12	Auditing Fees	2,800	2,800	2,366	434	15.5%
13	Legal Expense	2,000	1,667	307	1,360	81.6%
14	Travel & Training	3,000	2,500	1,311	1,189	47.6%
15	Other Administrative Costs	22,000	18,333	28,802	(10,469)	-57.1%
16	Other Administrative Costs - CFP	-	-	-	-	0.0%
17	Total Administrative	204,000	170,466	184,511	(14,045)	-8.2%
18	Asset Management Fees	9,120	-	-	-	0.0%
19	Tenant Services	1,900	1,583	815	768	48.5%
	Utilities					
20	Water & Sewer	52,000	43,333	48,485	(5,152)	-11.9%
21	Electricity	6,500	5,417	5,433	(16)	-0.3%
22	Gas	2,000	1,667	1,088	579	34.7%
23	Total Utilities	60,500	50,417	55,006	(4,589)	-9.1%
24	Maintenance	251,980	209,983	500,638	(290,655)	-138.4%
25	Protective Services	5,800	4,833	9,128	(4,295)	-88.9%
26	Insurance Expense	49,000	40,833	41,421	(588)	-1.4%
27	Payments in Lieu of Taxes	13,000	10,833	10,833	-	0.0%
28	Bad Debt-Tenants	10,000	8,333	-	8,333	0.0%

29	Total Operating Expenses	605,300	497,281	802,352	(305,071)	-61.3%
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30	Cash Flow from Operations	(105,000)	(80,365)	(159,959)	(79,594)	-99.0%
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	Other Financial Items-Sources & (Uses)					
31	HUD Grants - Capital Contributions - CFP	140,000	116,667	46,450	(70,217)	-60.2%
32	Capital Expenditures	(140,000)	(116,667)	(46,450)	70,217	-60.2%
33	Other Financial Items - Sources & (Uses)					
34	Total Other Financial Items	-	-	-	-	0.0%

35	Net Cash Flow	\$ (105,000)	\$ (80,365)	\$ (159,959)	\$ (79,594)	-99.0%
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Notes (Number is line reference)

24 Significant rehab projects \$331,000; 1 home rehab, roofs on 36 units of townhomes and replace water heater, A/C, and furnace at 8 homes

Operating Statement

Date:

October 31, 2020

Wilson Apartments (Public Housing)			
41 3 Ave NE		Budgeted Vacancy Loss	2%
Number of Units	126	Vacancy Loss YTD	1.0%

	Account Title	Annual Budget	YTD Budget	YTD Actual	YTD Budget vs. Actual Var. \$	YTD Budget vs. Actual Var. %
Operating Income:						
1	Gross Potential Rent	\$ 354,000	\$ 295,000	\$ 328,478	\$ 33,478	11.3%
2	Less: Vacancy Loss	(7,100)	(5,917)	(3,382)	2,535	42.8%
3	Net Tenant Rental Revenue	346,900	289,083	325,096	36,013	12.5%
4	Gross Potential Subsidy	261,600	218,000	226,764	8,764	4.0%
5	Less: Subsidy Loss - Proration	(26,200)	(21,833)	(15,209)	6,624	30.3%
6	Net Operating Subsidy	235,400	196,167	211,555	15,388	7.8%
7	HUD PHA Operating Grant - CFP	80,700	67,250	93,342	26,092	38.8%
8	Other Income	44,200	36,833	31,634	(5,199)	-14.1%
	Total Operating Income	707,200	589,333	661,627	72,294	12.3%

Operating Expenses:

Administrative						
9	Administrative Salaries & Benefits	129,000	107,500	82,344	25,156	23.4%
10	Management & Bkpg Fees - Operations	106,600	88,833	94,602	(5,769)	-6.5%
11	Management Fees - CFP	27,000	22,500	40,920	(18,420)	-81.9%
12	Auditing Fees	4,800	4,800	3,943	857	17.9%
13	Legal Expense	5,000	4,167	557	3,610	86.6%
14	Travel & Training	3,000	2,500	903	1,597	63.9%
15	Other Administrative Costs	25,800	21,500	21,936	(436)	-2.0%
16	Other Administrative Costs - CFP	-	-	-	-	0.0%
17	Total Administrative	301,200	251,800	245,205	6,595	2.6%
18	Asset Management Fees	15,000	-	-	-	0.0%
19	Tenant Services	3,100	2,583	3,349	(766)	-29.7%
Utilities						
20	Water & Sewer	23,000	19,167	18,037	1,130	5.9%
21	Electricity	55,000	45,833	49,451	(3,618)	-7.9%
22	Gas	38,000	31,667	20,734	10,933	34.5%
23	Total Utilities	116,000	96,667	88,222	8,445	8.7%
24	Maintenance	271,000	225,833	421,646	(195,813)	-86.7%
25	Protective Services	21,000	17,500	12,993	4,507	25.8%
26	Insurance Expense	21,400	17,833	17,945	(112)	-0.6%
27	Payments in Lieu of Taxes	13,500	11,250	11,250	-	0.0%
28	Bad Debt-Tenants	5,000	4,167	1,641	2,526	60.6%

29	Total Operating Expenses	767,200	627,633	802,251	(174,618)	-27.8%
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30	Cash Flow from Operations	(60,000)	(38,300)	(140,624)	(102,324)	-267.2%
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Other Financial Items-Sources & (Uses)						
31	HUD Grants - Capital Contributions - CFP	300,000	250,000	3,500	(246,500)	-98.6%
32	Extraordinary Maintenance	-	-	(5,157)	(5,157)	0.0%
33	Capital Expenditures	(300,000)	(250,000)	(3,500)	246,500	-98.6%
34	Other Financial Items-Sources & (Uses)	-	-	-	-	0.0%
35	Total Other Financial Items	-	-	(5,157)	(5,157)	0.0%

36	Net Cash Flow	\$ (60,000)	\$ (38,300)	\$ (145,781)	\$ (107,481)	-280.6%
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Notes (Number is line reference)

24 Significant roof replacement project \$256,000 and \$40,000 to replace appliances

**St. Cloud HRA
Germain Towers Fund 402
Balance Sheet
October 31, 2020**

Assets

Cash & Investments	\$ 22,368
Accounts Receivable (Net of Allowance)	337
Due From Governments - Other	964
Tenant Security Deposits	14,640
Accrued Interest Receivable	106
Prepaid Insurance and Expenses	7,193
Land & Land Improvements	76,067
Furniture & Equipment	2,750
Buildings	4,331,370
Accumulated Depreciation	(3,251,538)
Construction In Progress	313
Total Assets	<u>\$ 1,204,570</u>

Liabilities & Net Assets

Current Liabilities

Accounts Payable	\$ (3,181)
Due To Other Governments	7,000
Accrued Wages and Benefits	1,357
Tenant Security Deposit & Interest Payable	14,881
Prepaid Rents	2,990
Interest Payable	2,138
Bonds Payable	190,000
Accrued Compensated Absences	2,817
Total Current Liabilities	<u>\$ 218,002</u>

Long-term Liabilities

Advance From Other Funds		
COCC (440)	\$ 53,463	
Community Housing Fund (301)	<u>638,214</u>	
Total Advances from Other Funds		\$ 691,677
Bond Discount Amortization		<u>(1,716)</u>
Total Long Term Liabilities		<u>\$ 689,961</u>

Net Assets	<u>\$ 296,607</u>
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Total Liabilities & Net Assets	<u>\$ 1,204,570</u>
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Operating Statement

Date:

October 31, 2020

Germain Towers (Section 8 New Construction)			
905 West St. Germain		Budgeted Vacancy Loss	3%
Number of Units	89	Vacancy Loss YTD	0.5%

	Account Title	Annual Budget	YTD Budget	YTD Actual	YTD Budget vs. Actual Var. \$	YTD Budget vs. Actual Var. %
Operating Income:						
1	Gross Potential Rent	\$ 173,400	\$ 144,500	\$ 164,501	\$ 20,001	13.8%
2	Less: Vacancy Loss	(3,500)	(2,917)	(805)	2,112	72.4%
3	Net Tenant Rental Revenue	169,900	141,583	163,696	22,113	15.6%
4	HUD HAP Subsidy	245,100	204,250	201,157	(3,093)	-1.5%
5	Other Income	45,100	37,583	35,586	(1,997)	-5.3%
6	Total Operating Income	460,100	383,416	400,439	17,023	4.4%

Operating Expenses:						
7	Administrative Salaries & Benefits	56,000	46,667	36,701	9,966	21.4%
8	Management & Bkpg Fees	50,400	42,000	45,084	(3,084)	-7.3%
9	Auditing Fees	1,100	1,100	1,051	49	4.5%
10	Legal Expense	1,000	833	558	275	33.0%
11	Travel & Training	1,000	833	759	74	8.9%
12	Other Administrative Costs	12,100	10,083	15,146	(5,063)	-50.2%
13	Total Administrative	121,600	101,516	99,299	2,217	2.2%
14	Tenant Services	100	83	359	(276)	-332.5%
	Utilities					
15	Water & Sewer	13,000	10,833	9,729	1,104	10.2%
16	Electricity	17,000	14,167	11,583	2,584	18.2%
17	Gas	20,000	16,667	8,123	8,544	51.3%
18	Total Utilities	50,000	41,667	29,435	12,232	29.4%
19	Maintenance	96,000	80,000	82,854	(2,854)	-3.6%
20	Protective Services	14,000	11,667	9,488	2,179	18.7%
21	Insurance Expense	18,500	15,417	24,517	(9,100)	-59.0%
22	Payments in Lieu of Taxes	8,400	7,000	8,308	(1,308)	-18.7%
23	Bad Debt-Tenants	5,000	4,167	2,769	1,398	33.5%
24	Debt Interest	4,700	3,917	4,275	(358)	-9.1%

25	Total Operating Expenses	318,300	265,434	261,304	4,130	1.6%
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26	Net Income (Loss) Excl. Depr & Amort.	141,800	117,982	139,135	21,153	17.9%
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Other Financial Items-Sources & (Uses)						
27	Debt Principal	(552,800)	(460,667)	(460,667)	-	0.0%
28	Capital Expenditures	(290,000)	(241,667)	(289,379)	(47,712)	19.7%
29	Other Financial Items-Sources & (Uses)	701,000	584,167	600,014	15,847	2.7%
30	Total Other Financial Items	(141,800)	(118,167)	(150,032)	(31,865)	27.0%

31	Net Cash Flow	\$ -	\$ (185)	\$ (10,897)	\$ (10,712)	0.0%
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Notes:

28 Roof project

**St. Cloud HRA
Northway A & B Fund 403
Balance Sheet
October 31, 2020**

Assets	
Cash & Investments	\$ 333,665
Accounts Receivable (Net of Allowance)	841
Accrued Interest Receivable	505
Due from Other Governments	1,281
Tenant Security Deposits	28,755
Prepaid Insurance and Expenses	7,252
Land & Land Improvements	205,818
Furniture & Equipment	50,392
Buildings	4,706,264
Accumulated Depreciation	(4,444,629)
Total Assets	\$ 890,144
Liabilities & Net Assets	
Current Liabilities	
Accounts Payable	\$ 2,102
Due To Other Governments	11,000
Due To Other Funds	90,000
Accrued Salaries and Benefits	2,507
Tenant Security Deposit & Interest Payable	27,220
Prepaid Rent	11,683
Accrued Compensated Absences	4,691
Total Current Liabilities	\$ 149,203
Net Assets	\$ 740,941
Total Liabilities & Net Assets	\$ 890,144

Operating Statement

Date:

October 31, 2020

Northway A & B (Section 8 New Construction)						
1525 Northway Dr./2401-2445 15 St. N		Budgeted Vacancy Loss			1.5%	
Number of Units	101	Vacancy Loss YTD			1.7%	
	Account Title	Annual Budget	YTD Budget	YTD Actual	YTD Budget vs. Actual Var. \$	YTD Budget vs. Actual Var. %
Operating Income:						
1	Gross Potential Rent	\$ 325,000	\$ 270,833	\$ 267,176	\$ (3,657)	-1.4%
2	Less: Vacancy Loss	(4,900)	(4,083)	(4,604)	(521)	-12.8%
3	Net Tenant Rental Revenue	320,100	266,750	262,572	(4,178)	-1.6%
4	HUD HAP Subsidy	325,400	271,167	293,558	22,391	8.3%
5	Other Income	22,500	18,750	18,534	(216)	-1.2%
6	Total Operating Income	668,000	556,667	574,664	17,997	3.2%
Operating Expenses:						
7	Administrative Salaries & Benefits	81,000	67,500	65,389	2,111	3.1%
8	Management & Bkpg Fees	86,800	72,333	75,366	(3,033)	-4.2%
9	Auditing Fees	1,600	1,600	1,314	286	17.9%
10	Legal Expense	1,500	1,250	467	783	62.6%
11	Travel & Training	1,300	1,083	1,110	(27)	-2.5%
12	Other Administrative Costs	16,000	13,333	19,257	(5,924)	-44.4%
13	Total Administrative	188,200	157,099	162,903	(5,804)	-3.7%
14	Asset Management Fees	12,100	-	-	-	0.0%
15	Total Tenant Services	500	417	836	(419)	-100.5%
	Utilities					
16	Water & Sewer	33,000	27,500	29,858	(2,358)	-8.6%
17	Electricity	18,000	15,000	14,068	932	6.2%
18	Gas	28,000	23,333	12,571	10,762	46.1%
19	Total Utilities	79,000	65,833	56,497	9,336	14.2%
20	Maintenance	190,000	158,333	126,240	32,093	20.3%
21	Protective Services	17,000	14,167	10,487	3,680	26.0%
22	Insurance Expense	28,000	23,333	22,747	586	2.5%
23	Payments in Lieu of Taxes	13,200	11,000	11,000	-	0.0%
24	Bad Debt-Tenants	3,000	2,500	1,270	1,230	49.2%
25	Debt Interest	-	-	-	-	0.0%
26	Total Operating Expenses	531,000	432,682	391,980	40,702	9.4%
27	Net Income (Loss) Excl. Depr & Amort.	137,000	123,985	182,684	58,699	47.3%
	Other Financial Items-Sources & (Uses)					
29	Debt Principal	(90,000)	(75,000)	(75,000)	-	0.0%
30	Capital Expenditures	-	-	-	-	0.0%
31	Other Financial Items-Sources & (Uses)	-	-	-	-	0.0%
32	Total Other Financial Items	(90,000)	(75,000)	(75,000)	-	0.0%
33	Net Cash Flow	\$ 47,000	\$ 48,985	\$ 107,684	\$ 58,699	119.8%

**St. Cloud HRA
Eastwood Park Apartments Fund 404
Balance Sheet
October 31, 2020**

Assets	
Cash & Investments	\$ 14,479
Accounts Receivable (Net of Allowance)	7,687
Due from Other Governments	247
Tenant Security Deposits	7,905
Prepaid Insurance and Expenses	1,428
Land & Land Improvements	156,570
Buildings	831,975
Accumulated Depreciation	(428,149)
Total Assets	\$ 592,142
Liabilities & Net Assets	
Current Liabilities	
Accounts Payable	\$ (186)
Due To Other Governments	4,750
Due To Other Funds	25,000
Accrued Salaries and Benefits	537
Tenant Security Deposit & Interest Payable	7,890
Prepaid Rents	4,176
Accrued Compensated Absences	828
Total Current Liabilities	\$ 42,995
Long Term Liabilities	
Advance From Other Funds (301)	\$ 377,000
Loans Payable - MHFA	196,000
Total Long Term Liabilities	\$ 573,000
Net Assets	(23,853)
Total Liabilities & Net Assets	\$ 592,142

Operating Statement

Date: October 31, 2020

Eastwood Park Apartments (Workforce Housing)			
530 3 St NE		Budgeted Vacancy Loss	5%
Number of Units	17	Vacancy Loss YTD	2.2%

	Account Title	Annual Budget	YTD Budget	YTD Actual	YTD Budget vs. Actual Var. \$	YTD Budget vs. Actual Var. %
Operating Income:						
1	Gross Potential Rent	\$ 125,800	\$ 104,833	\$ 102,928	\$ (1,905)	-1.8%
2	Less: Vacancy Loss	(6,300)	(5,250)	(2,307)	2,943	56.1%
3	Net Tenant Rental Revenue	119,500	99,583	100,621	1,038	1.0%
4	Other Income	10,400	8,667	7,792	(875)	-10.1%
5	Total Operating Income	129,900	108,250	108,413	163	0.2%

Operating Expenses:

Administrative						
6	Administrative Salaries & Benefits	14,000	11,667	11,557	110	0.9%
7	Management & Bkpg Fees - Operations	14,900	12,417	13,225	(808)	-6.5%
8	Auditing Fees	300	300	263	37	12.3%
9	Legal Expense	2,000	1,667	408	1,259	75.5%
10	Travel & Training	100	83	6	77	92.8%
11	Other Administrative Costs	2,300	1,917	4,014	(2,097)	-109.4%
12	Total Administrative	33,600	28,051	29,473	(1,422)	-5.1%
Utilities						
13	Water & Sewer	5,500	4,583	6,727	(2,144)	-46.8%
14	Electricity	2,800	2,333	2,001	332	14.2%
15	Gas	5,000	4,167	4,525	(358)	-8.6%
16	Total Utilities	13,300	11,083	13,253	(2,170)	-19.6%
17	Maintenance	40,500	33,750	31,260	2,490	7.4%
18	Protective Services	4,500	3,750	3,327	423	11.3%
19	Insurance Expense	4,300	3,583	3,534	49	1.4%
20	Payments in Lieu of Taxes	5,700	4,750	4,750	-	0.0%
21	Bad Debt-Tenants	3,000	2,500	1,136	1,364	54.6%

22	Total Operating Expenses	104,900	87,467	86,873	594	0.7%
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23	Cash Flow from Operations	25,000	20,783	21,540	757	3.6%
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Other Financial Items-Sources & (Uses)						
24	Debt Service Payment Principal	(25,000)	(20,833)	(20,833)	-	0.0%
25	Total Other Financial Items	(25,000)	(20,833)	(20,833)	-	0.0%

26	Net Cash Flow	\$ -	\$ (50)	\$ 707	\$ 757	0.0%
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TO: St. Cloud HRA Board of Commissioners

FROM: Paul Soenneker, Project Manager

DATE: December 9, 2020

SUBJECT: Contracts for Flooring Installation Services

Requested Action: Approval of the Flooring Installation Services contracts for a pool of contractors. These contracts would be for one year.

Background: On November 5, 2020 the HRA solicited quotes for square foot pricing with possible upcharges from three companies to provide vinyl and carpet flooring installation services for all of the HRA owned apartments, townhomes and single-family homes. Possible upcharges would be removing and resetting toilets, washers, dryers, stoves and refrigerators and installing vinyl and wood base. We received three quotes for these services.

When evaluating the quotes; we noted that Hansen Flooring Gallery's quoted vinyl square foot pricing was a little higher than Floor to Ceilings quote, but Hansen's square foot price included removing and resetting the stove and refrigerator and removing and replacing wood base in their square foot pricing whereas those items needed to be added to Floor to Ceilings. Once we added those items to Floor to Ceilings square foot prices; Hansen Flooring was very competitive. We also took into consideration the fact that often times both the vinyl and carpet floors are replaced at the same time, so we thought it would be best to have one contractor do both to eliminate any additional costs and confusion as to who was to do what work.

The lowest responsible contractor will be considered Contractor #1 and will be contacted to ascertain as to whether or not they are available to do the flooring work within 10 business days. If they inform us that they will not be able to do the flooring work within that time frame; the HRA will contact the contractor who submitted the next lowest quote (Contractor #2) and so on until the work is completed. We believe that this will free up Property Managers time because they currently get quotes for these services every time that they have flooring replaced at any of their properties.

Contractor #1: Hansen Flooring Gallery Inc.

Contractor #2: Floor to Ceiling

Contractor #3: Multiple Concepts Interiors

Frequency of Requests: Every year.

Related Action: None.

Future Action: None.

Relationship to Goals: Goal #2 - St. Cloud HRA will promote fair housing and strive for high performance in HRA properties and housing subsidy programs.

Budget Impact: This item will be funded through each buildings budget.

TO: St. Cloud HRA Board of Commissioners

FROM: Louise Reis, Executive Director

DATE: December 9, 2020

SUBJECT: Set Date for Public Hearing for Updates to Agency Plan

Requested Action: Set date for the public hearing for updates to Agency Plans for the FY 2021 for Wednesday, January 27, 2021.

Background: During the HUD Compliance Monitoring Review, the Department of Housing and Urban Development noted two items that are required to be included in our Agency Plans; Admissions and Continued Occupancy Plan and the Administrative Plan.

Frequency of Request: One time.

Related Actions: The HRA Board of Commissioners approved the 2021 PHA Plan in August of 2020.

Future Action: The public hearing will be held on Wednesday, January 27, 2021. I will provide a brief overview of the added items to our agency plans. If there are no issues at the public hearing, I will be asking for approval of the updates.

Relationship to Goals: Goal #2 –St. Cloud HRA will promote fair housing and strive for high performance in HRA properties and housing subsidy programs.

Budget Impact: These additional items have no impact on the budgets.

TO: HRA Board of Commissioners
FROM: Louise Reis, Executive Director
DATE: December 8, 2020
SUBJECT: Community Development Block Grant Application for 2021

Requested Action: Approval of application to the City of St. Cloud for Community Development Block Grant (CDBG) for 2021 for Single Family Rehab Program.

Background: The St. Cloud Housing and Redevelopment Authority applied for the past several years for funds for the Single Family Rehab Program under CDBG. We plan to apply for the Single Family Rehab Program in the amount of \$300,000. There are currently three households on the wait list for rehab of their homes.

Frequency of Request: Annual.

Related Actions: None.

Future Action: None.

Relationship to Goals: Goal #1 – The St Cloud HRA will be an active partner in neighborhood/community concerns regarding housing and neighborhoods.

Budget Impacts: This activity would be funded by the CDBG.

Resolution 2020-11

**Community Development Block Grant (CDBG)
Application for Fiscal Year 2021 Single Family Rehab Program**

Whereas, as an Entitlement Community, as defined by the Department of Housing and Urban Development (HUD), the City of St. Cloud is eligible to apply for an annual allocation of funds through the Community Development Block Grant Program (CDBG); and

Whereas, the City of St. Cloud has created an application and funding process whereby area Non-Profit Organizations, City Departments and The Housing and Redevelopment Authority (HRA) may apply for Community Development Block Grant (CDBG) funding for their future CDBG activity needs; and

Whereas, the Single Family Rehab Program has been issued and spent-down funds for the rehabilitation of homes in need in the City of St. Cloud over the past several years that qualify under CDBG regulations; and

Now, Therefore, is asking for the continuation of support for this program.

Be It Further Resolved by the Board of Commissioners of the Housing and Redevelopment Authority of St. Cloud, Minnesota, that it is to be understood that conditions must be met in compliance with the CDBG program guidelines when issued these funds.

Adopted this 16th day of December 2020.

ATTEST:

Nancy Gohman, Chair

George Hontos, Secretary

TO: St. Cloud HRA Board of Commissioners

FROM: Louise Reis, Executive Director

DATE: December 8, 2020

SUBJECT: Approval of Resolution 2020-12 - Authorizing Participation in the Minnesota City Participation Program for 2021

Requested Action: Approval of Resolution 2020-12 authorizing the St. Cloud HRA to participate in the Minnesota City Participation Program for 2021.

Background: The Minnesota City Participation Program is an annual application process that provides cities throughout the state with a unique opportunity to easily access housing resources to meet the needs of their citizens. Cities apply to participate in the program and once approved, Minnesota Housing sells mortgage revenue bonds to meet the housing needs. The proceeds of these bonds provide affordable interest rate home mortgage loans to their identified service area for low-and moderate-income first-time homebuyers through the Minnesota Housing first-time homebuyer loan program known statewide as the Minnesota Mortgage Program (MMP).

Funds are reserved in the pool for participating cities. Minnesota Housing uses a population-based formula to determine each city's maximum allocation. The maximum allocation a city receives is determined by its population compared to the total population of all applicants.

At this time, there are no administrative fees charged to participate. There is a minimum usage requirement of 50% of the allocation in order to participate the following year.

Frequency of Request: Annually.

Related Actions: None.

Future Action: None.

Relationship to Goals: Goal #1 – The St. Cloud HRA will be an active partner in neighborhood/community concerns regarding housing and neighborhoods. Goal #3 - The St. Cloud HRA will encourage collaboration with other community organizations and continue to seek funding sources for all programs.

Budget Impact: None.

RESOLUTION 2020-12

**RESOLUTION OF AUTHORIZING PARTICIPATION
IN THE
MINNESOTA CITY PARTICIPATION PROGRAM FOR 2021**

WHEREAS, the HOUSING AND REDEVELOPMENT AUTHORITY OF ST. CLOUD, MINNESOTA (hereinafter called the “Authority”) is authorized to participate in the Minnesota City Participation Program as set up by Minnesota Housing. This participation will allow low-and moderate income first-time homebuyers through the Minnesota Housing first-time homebuyer loan program.

WHEREAS, Minnesota Housing requires that the Board of Commissioners formally authorize participation in the program;

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners to authorized participation in the Minnesota City Participation Program.

(SEAL)

Adopted this 16th day of December, 2020.

ATTEST:

Chair, Nancy Gohman

Secretary, George Hontos

**MINNESOTA HOUSING FINANCE AGENCY
MINNESOTA CITY PARTICIPATION PROGRAM**

**PROGRAM APPLICATION
COMMITMENT AGREEMENT**

THIS APPLICATION AND AGREEMENT (this "Agreement") is between St. Cloud Housing and Redevelopment Authority (the "City"), with its office at 1225 West Germain St, St. Cloud, MN 56301 and Minnesota Housing Finance Agency ("Minnesota Housing"), with its office at 400 Wabasha Street North, Suite 400, St. Paul, MN 55102.

RECITALS:

A. Minnesota Housing, under the provisions of Minn. Stat. §474A.061, Subd. 2(a) is authorized to issue qualified mortgage bonds, as that term is used in the Internal Revenue Code of 1986, as amended (the "Code"), on behalf of the City, and it will issue bonds for that purpose (the "Bonds").

B. The City applying to participate is a Minnesota city, county, city or county housing and redevelopment authority, economic development authority, port authority or a consortium of local government units, as defined by Minnesota Statutes §474A.061, Subd. 4(c).

C. Minnesota Housing has implemented Minnesota Housing Finance Agency Minnesota City Participation Program (the "Program") and will use the proceeds from the issuance of the Bonds to fund the Program.

D. The City has requested and received a set-aside of funds from the Program.

E. The City wishes to obtain a commitment by Minnesota Housing to direct Minnesota Housing's designated Master Servicer (the "Master Servicer") to purchase mortgage notes ("Mortgages") that will be originated by a lender or lenders that meet Minnesota Housing requirements for participation in programs funded by qualified mortgage bonds (collectively, the "Lender").

F. Mortgages that the Master Servicer purchases pursuant to the commitment requested by the City must only be for residences located within a geographic area to be established and designated by the City.

G. Minnesota Housing is willing to issue a commitment agreeing to purchase Mortgage-Backed Securities backed by Mortgages that are (i) originated by the Lender; (ii) purchased by the Master Servicer; (iii) in accordance with the terms and conditions of this Agreement, the Program, and the Start Up Procedural Manual to be supplied by Minnesota Housing (the "Procedural Manual"), the provisions of which are hereby incorporated by reference into this Agreement as if set forth in full herein; and (iv) made to borrowers with adjusted incomes not exceeding the greater of 80 percent of statewide or area median income as calculated by Minnesota Housing.

NOW, THEREFORE, in consideration of the covenants contained in this Agreement, Minnesota Housing and the City agree as follows:

1. **City Requirements.** All Mortgages submitted to Minnesota Housing for purchase under the Program must comply with all of the requirements of the Program, the Start Up Procedural Manual and this Agreement.

2. **Commitment and Commitment Amount.** The City, which applied in January 2021 for a commitment, hereby requests that Minnesota Housing cause its Master Servicer to purchase Mortgages that have been originated by the Lender and meet the requirements of, and are made in accordance with the provisions of, this Agreement, the Program, and the Procedural Manual. Minnesota Housing, by accepting this Agreement, commits to the purchase of those Mortgages in the aggregate principal amount (the "Commitment Amount") to be determined and allocated

by Minnesota Housing in accordance with Minnesota Statutes §474A.061, Subd. 4(d), and provided to the City.

The Master Servicer will only purchase Mortgages pursuant to this Agreement securing property that, and borrowers who, satisfy the requirements and provisions of this Agreement, the Program, and the Procedural Manual. The City acknowledges that the commitment is effective upon the approval thereof by Minnesota Housing and the delivery of a copy of this Agreement by Minnesota Housing to the City.

3. **Lender Qualifications.** Lenders must meet Minnesota Housing requirements for participation in programs funded by qualified mortgage bonds.

4. **Commitment Term.** The term of this Agreement and the City's participation in the Program (the "Commitment Term") will commence on January 16, 2021 and shall continue through November 30, 2021. This Agreement, and the City's participation in the Program, will automatically terminate, without the need for any action by either party hereto, at the end of the Commitment Term.

5. **Set-Aside Term.** The Commitment Amount will be set-aside and held by Minnesota Housing for the sole use by the City for a period of time to be established by Minnesota Housing, in its sole option and discretion, provided, however, that time period will not be less than six months (the "Set-Aside Term") commencing on a date to be selected and specified by Minnesota Housing. Minnesota Housing will notify the City in writing of the date on which the Set-Aside Term commences.

Any portion of the Commitment Amount not reserved for the purchase of qualifying Mortgages as of the end of the Set-Aside Term shall be canceled and returned to Minnesota Housing for redistribution under the Program. In addition, any portion of the Commitment Amount reserved for Mortgages that are not delivered to the Master Servicer for purchase within the time period delineated in the Procedural Manual for that purchase, will be canceled and Minnesota Housing will redistribute that amount under the Program. Minnesota Housing may make any funds available to the Program at the end of the Commitment Term for mortgage loans that are eligible to be financed with proceeds of the Bonds.

6. **Commitment Fees.** There is no commitment fee payable by the City for the commitment by Minnesota Housing to the purchase by the Master Servicer of qualifying Mortgages.

7. **Purchase Price.** The purchase price of each Mortgage to be purchased by the Master Servicer pursuant to this Agreement will be as set forth in the requirements of the Procedural Manual and posted on Minnesota Housing's website.

8. **Mortgage Terms.** The terms and conditions for all Mortgages, including but not limited to the interest rate, will be set from time to time by Minnesota Housing, at its sole option and discretion, and communicated to the Lender in accordance with the procedures set forth in the Procedural Manual.

9. **Area Limitation.** Minnesota Housing, pursuant to this Agreement, is required to purchase only those Mortgages that are for residences located within a geographic area to be established and designated by the City.

10. **Servicing.** The servicing of Mortgages shall be the sole responsibility of the Master Servicer or one or more other entities that Minnesota Housing may designate in its sole discretion.

11. **Contract Documents.** The purchase by the Master Servicer of each Mortgage pursuant to Minnesota Housing's commitment is a contract consisting of this Agreement and the provisions and requirements contained in the Procedural Manual, with all amendments and supplements thereto in effect as of the date of Minnesota Housing's acceptance of this Agreement.

12. **Paragraph Captions and Program Headings.** The captions and headings of the paragraphs of this Agreement are for convenience only and will not be used to interpret or define the provisions thereof.

13. **Applicable Law.** This Agreement is made and entered into in the State of Minnesota, and all questions relating to the validity, construction, performance and enforcement hereof will be governed by the laws of the State of Minnesota.

14. **Agreement Conditional Upon Minnesota Housing Approval.** This Agreement will be a binding obligation of Minnesota Housing upon its execution by Minnesota Housing and delivery of a copy of the same to the City; provided, however, Minnesota Housing may, in its sole option and discretion, any time on or after January 16, 2021 revoke such obligation and terminate this Agreement if the City has not fully executed and returned a fully executed original hereof to Minnesota Housing. That revocation and termination will be accomplished and evidenced by Minnesota Housing notifying the City thereof by way of a "Certified Letter - Return Receipt Requested" addressed and delivered to the City. Upon revocation and termination this Agreement will be null and void and of no force or effect.

15. **Issuance of Bonds.** The City hereby authorizes Minnesota Housing to issue, on behalf of the City, qualified mortgage bonds, as that term is used in the Code, in an amount equal to the Commitment Amount, and Minnesota Housing agrees to issue those bonds if and when federal law authorizes and Minnesota Housing deems it is economically feasible to do so.

(THE REMAINING PORTION OF THIS PAGE IS INTENTIONALLY LEFT BLANK)

IN WITNESS WHEREOF, the City has executed this Agreement this ____ day of
(Day)

_____, _____
(Month) (Year)

**CITY: St. Cloud Housing and
Redevelopment Authority**

By: _____
(Signature of Authorized Officer)

(Name of Authorized Officer)

Minnesota Housing APPROVAL

Minnesota Housing hereby accepts the above Program Application-Commitment Agreement and approves and grants participation in the program.

MINNESOTA HOUSING FINANCE AGENCY

By: _____
Kasey Kier

Its: Assistant Commissioner, Single-Family Division

Signed this ____ day of _____, 2021.

TO: St. Cloud HRA Board of Commissioners

FROM: Louise Reis, Executive Director
Karen Rizer, Finance Director

DATE: December 9, 2020

SUBJECT: Approval of Contract with IntelCONNECT

Requested Action: Approval of a three-year contract for telephone system/service with IntelCONNECT.

Background: For the past several years, the HRA has had a contract with Marco Technologies, Inc for our telephone system and service. The contract will be ending on March 8, 2021 and the HRA would be required to update the telephone equipment at that time. For the phone lines, the HRA currently has service through TDS Metrocom, LLC.

On September 1, 2020, the HRA issued a Request for Proposals for Telephone Systems. Systems that were under consideration included a hosted VoIP system, an on-premise VoIP system, or similar products. We received four proposals. The initial prices for monthly service and equipment are listed below.

IntelCONNECT 620 Apollo Avenue NE St. Cloud, MN 56304	\$809.60 monthly \$896.85 equipment purchase
Marco Technologies, LLC 4510 Heatherwood Rd St. Cloud, MN 56301	\$926.99 monthly \$39,486.36 equipment purchase
Optus Inc 3423 One Place Jonesboro, AR 72404	\$923.18 monthly no equipment purchase \$2,100.00 annual service contract
TDS Metrocom, LLC 525 Junction Road Madison, WI 53717	\$1,043.10 monthly \$1,433.44 equipment purchase

Based on proposals received, we are requesting approval for a three-year contract with IntelCONNECT.

Frequency of Request: One time.

Related Actions: None.

Future Action: None.

Relationship to Goals: Goal #4 – St. Cloud HRA will make efficient use of funding, technology, and personnel resources.

Budget Impact: Phone service is budgeted in each fund's operating budget. This service is about \$200 per month less than we are currently paying, with nine additional virtual lines for each of the caretakers and other features which we do not currently have. Depending on the quality of service, there is the possibility that we will need to add a software defined wide area network at some point. That cost will be approximately \$200 per month, so the grand total would be approximately the same as we are paying now.

TO: St. Cloud HRA Board of Commissioners

FROM: Louise Reis, Executive Director and Karen Rizer, Finance Director

DATE: December 10, 2020

SUBJECT: Caretaker Compensation Policy

Requested Action: Approve Change to Caretaker Compensation Policy.

Background: The HRA's Caretaker Compensation Policy provides that Caretakers will be compensated at an hourly rate not less than HUD's Caretaker Maintenance Wage Rate Decision for the HRA. For the past two years, that amount has been \$13.50. Last month, the HRA received its new Caretaker Maintenance Wage Rate Decision that is effective for January 1, 2021, and that amount is \$12.65.

Due to the difficulty in filling these positions and the additional responsibilities these positions have due to the pandemic, HRA management does not recommend a pay cut for these positions.

Management is requesting that the policy be amended to read that the Caretakers will be compensated at an hourly rate not less than the higher of HUD's Caretaker Maintenance Wage Rate Decision for the St. Cloud HRA or \$13.50.

Frequency of Request: Once.

Related Actions: None.

Future Action: None.

Budget Impact: Caretaker compensation is budgeted for at each applicable property.

TO: St. Cloud HRA Board of Commissioners

FROM: Louise Reis, Executive Director

DATE: December 9, 2020

SUBJECT: Extension of Waivers Granted by the Department of Housing & Urban Development for Housing Authorities Under COVID 19

Requested Action: Approval of extension on waivers granted by the Department of Housing & Urban Development for Housing Authorities under COVID -19 for the Public Housing, Housing Choice Voucher Programs and Agency Administration.

Background: On April 10, 2020, the Department of Housing & Urban Development (HUD) published Notice PIH 2020-05 to provide statutory and regulatory relief to housing authorities on requirements of the various programs due to COVID 19. The use of these waivers is at the discretion of a housing authority. HUD has authorized all public housing authorities to implement certain waivers from its normal requirements without prior HUD approval. The St. Cloud HRA has chosen to implement the waivers on April 10, 2020. HUD has now allowed an extension under Notice PIH 2020-33, Rev 2 for the waivers listed below.

Once approved by the Board of Commissioners, these waivers will be posted on the St. Cloud HRA website and amend the existing Admissions and Continued Occupancy Plan (ACOP) and the Administrative Plan.

PH and HCV -1: PHA 5-Year and Annual Plan Submission Dates, Significant Amendment Requirements. **Agency Plans** – the St. Cloud HRA hereby adopts the authority granted by HUD to delay submission of its agency plan according to the dates provided in the HUD notice. **Significant Amendments** – The St. Cloud HRA adopts the waiver of the significant amendment process until December 31, 2020, with alternative date of January 16, 2021.

PH and HCV -2: Family Income and Composition: Delayed Annual Examinations. The St. Cloud HRA is hereby taking advantage of the waiver that delays annual reexaminations of HCV and public housing families. All annual recertification's due in calendar year 2020 will be completed by June 30, 2021.

PH and HCV -3: Family Income and Composition: Annual Examination - Income Verification requirements. The St. Cloud HRA will take advantage of the HUD waiver that allows the HRA to not follow the income hierarchy of PIH Notice 2018-18. The St. Cloud HRA will consider resident and self-certification as the highest form of income verification for exams done prior to June 30, 2021. The self-certification may occur over the telephone extemporaneously documented by the St. Cloud HRA staff, or via email or regular mail. If the St. Cloud HRA later determines that there are material discrepancies in a self-certification, the HRA will take the appropriate enforcement actions according to the St. Cloud HRA's policy.

PH and HCV -4: Family Income and Composition: Interim Examinations – The requirements for annual examinations stated in PH and HCV – 3 also apply to interim examinations conducted before June 30, 2021.

PH and HCV -5: Enterprise Income Verification (EIV) Monitoring – Waives the mandatory EIV monitoring requirements. This extension waiver ends on June 30, 2021.

PH and HCV – 6: Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension – Due to the COVID 19 emergency, the St. Cloud HRA will extend a families’ Contract of Participation in the FSS Program for up to 2 years. This extension waiver ends on June 30, 2021.

PH and HCV – 7: Waiting List: Opening and Closing: Public Notice – HUD provides a waiver for requirements of reopening the St. Cloud HRA’s waiting list. The St. Cloud HRA will accept this waiver if the St. Cloud HRA opens their closed waiting list prior to June 30, 2021. In accepting this waiver the HRA agrees to the communications requirements stated in the Notice.

HQS -1: Initial Inspection Requirements: St. Cloud HRA is accepting HUD’s waiver of initial inspections not being required prior to the beginning of the initial lease term. Instead, the St. Cloud HRA will accept an owner’s certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units. The St. Cloud HRA reserves the right to add other requirements or conditions to this owner certification. In any event, the St. Cloud HRA will conduct an HQS inspection of all units as soon as reasonable practical, but no later than October 31, 2020. This waiver is applicable until June 30, 2021.

HQS –3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option: The St. Cloud HRA is utilizing the option provided by HUD to approve HAP contracts and begin making housing assistance payments on a unit that fails initial HQS inspection providing the failure is solely for non-life threatening deficiencies. This option is available for both tenant-based and project-based units. The owner shall be given 60 days instead of the normal 30 days to repair any non-life threatening deficiencies. The ability to extend for 60 days ends on June 30, 2021.

HQS -4: HQS Initial Inspection Requirement – Alternative Inspection Option: HUD authorized housing authorities to allow a unit to be occupied prior to the initial inspection if the unit has passed an alternative inspection as allowed in the Administrative Plan within the previous 24 months. The St. Cloud HRA had to inspect the unit within 15 days of the Request for Tenant Approval. HUD is waiving the 15-day inspection requirement and allowing just the alternative inspection to suffice so long as the owner certifies that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit. The St. Cloud HRA may add additional requirements or conditions. This waiver is for both tenant-based and project-based units. This waiver is valid until June 30, 2021.

HQS -5: HQS Requirement: Biennial Inspections – Allows for the delay in biennial inspections, the St. Cloud HRA is required to have owner certification that there are no life-threatening deficiencies. This waiver is applicable until June 30, 2021.

HQS -6: HQS Interim Inspections: Interim inspections requested do not have to follow the normal regulatory timeframes. They must be made as soon as feasible. As a condition of this change the St. Cloud HRA is required to notify the owner of a reported life threatening deficiency. The owner must either correct the life threatening deficiency within 24 hours or provide adequate documentation that the reported deficiency does not exist. In the case of non-life threatening deficiencies the owner must make the repair or document that the deficiency does not exist within 30 days of any approved extension that the St. Cloud HRA makes. The St. Cloud HRA is not required to conduct an on-site inspection to verify the repairs have been made, but may rely on an alternative verification method such as photographs or tenant certifications. This waiver is applicable until June 30, 2021.

HQS -7: PBV Turnover Unit Inspections – Normally when a project-based voucher turns over, an inspection is made. This waiver allows the St. Cloud HRA to accept an owner certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist and allow the new tenant to move-in. The St. Cloud HRA reserves the right to add additional requirements or conditions. In any event, an inspection must be completed as soon as reasonably possible. The authority for this waiver ends on June 30, 2021.

HQS -8: PBV HAP Contract – HQS Inspections to Add or Substitute Units: At the discretion of the St. Cloud HRA and subject to all PBV requirements the HRA can allow a substitution of one unit for a previously covered unit. Normally the new unit must be inspected prior to initial occupancy. HUD has waived the pre-occupancy inspection requirement. A substitution can be made upon the owner's certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit. The St. Cloud HRA can add additional conditions or requirements. This waiver ends on June 30, 2021.

HQS -9: HQS Quality Control Inspections – The requirement for St. Cloud HRA to conduct supervisory quality control inspections of a sample of units under contract is waived until June 30, 2021.

HQS -10: Housing quality standards: Space and Security – The regulation establishes a minimum standard for adequate space for assisted families. It requires at least one bedroom or living/sleeping room for each 2 persons. For people continuing to live in the same unit who need to add a person or persons to their lease because of COVID 19 emergency, the minimum space requirement is waived. This does not apply to an initial or new lease. This waiver is in effect for the duration of the current lease term or through April 10, 2021, whichever period of time is longer.

HCV -1: Administrative Plan – HUD is waiving the requirement that all changes to the Administration Plan be approved by the Board of Commissioners prior to adoption. Instead, the Board must approve revisions as soon as practical, but no later than June 30, 2021.

HCV -2: Information When Family is Selected – PHA Oral Briefing – HUD requires that all families participating in the HCV or PBV program should be given an oral briefing prior to admission. This requirement is being waived and, as a substitute, HUD will allow things like webcasts, video calls, or expanded information packets as substitutes. Section 504 and the ADA requirements remain. This waiver expires on June 30, 2021.

HCV -3: Term of Voucher – Extensions of Term – HUD is waiving the requirement for voucher extensions to be according to the Administrative Plan. Instead, HUD is allowing the St. Cloud HRA to extend the term of vouchers according to the needs of the St. Cloud HRA's community. This authority expires on June 30, 2021.

HCV -4: PHA Approval of Assisted Tenancy – When HAP Contract is Executed – HUD is waiving the requirement that a Housing Assistance Payments (HAP) contract be executed within 60 days of the beginning of the lease and extending that term to 120 days from the beginning of the lease. This waiver expires June 30, 2021.

HCV -5: Absence from Unit – The regulation requires that a family not be absent from a unit for more than 180 consecutive calendar days for any reason. Due to COVID 19 emergency, this is being waived in the case of extenuating circumstances (e.g. hospitalizations, extended stays at nursing homes, caring for family members). This waiver expires on June 30, 2021.

HCV -6: Automatic Termination of HAP Contract – A HAP contract is typically terminated 180 days after the last HAP payment to the owner. This waiver removes the 180-day limit and substitutes a time set by the St. Cloud HRA. This waiver expires on June 30, 2021.

HCV -7: Increase in Payment Standard During HAP Contract Term – Provides St. Cloud HRA with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination. This waiver is applicable until June 30, 2021.

HCV -8: Utility Allowance Schedule: Required Review and Revision – Provides the St. Cloud HRA with the option to delay updating the utility allowance schedule. This waiver is applicable until June 30, 2021.

HCV -10: Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract – This waiver allows FUP participants to be placed under a HAP contract who have not reached the age of 26 instead of the age of 25. This waiver expires June 30, 2021.

HCV -11: Family Unification Program (FUP): Length of Assistance for Youth – Allows the St. Cloud HRA to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020 and December 31, 2020. This waiver expires June 30, 2021.

HCV -12: Family Unification Program (FUP): Timeframe for Referral – Allows the St. Cloud HRA to accept referrals of otherwise eligible youth who will leave the foster care system within 120 days. This waiver is applicable until June 30, 2021.

HCV -14: Mandatory Removal of Unit from PBV HAP Contract – This waiver allows the St. Cloud HRA to keep a PBV unit under contract for a period of time that extends beyond 180 days from the last HAP but does not extend beyond December 31, 2020. The waiver is applicable until June 30, 2021.

PH -1: Fiscal Closeout of Capital Grant Funds – This waiver extends the deadline for the submission of any Actual Development Cost Certificates (ADCC) and an Actual Modernization Cost Certification (AMCC) (two financial reporting documents required to close out Capital Fund grants). This waiver varies by housing authority.

PH -4: ACOP: Adoption of Tenant Selection Policies – This waiver allows the St. Cloud HRA to adopt and implement changes in their ACOP without formal Board approval so long as the Board of Commissioners approves them as soon as practical, but before June 30, 2021.

PH -5: Community Service and Self-Sufficiency Requirement (CSSR) – This waiver suspends the community service self-sufficiency requirement until June 30, 2021.

PH -6: Energy Audits- This waiver allows for the delay in due dates of energy audits. This waiver is applicable until December 31, 2021.

PH -7: Over-Income Families – This waiver suspends the over income requirement between now and June 30, 2021 and over-income families can retain their unit under the status quo.

PH -9: Review and Revision of Utility Allowance – This waiver provides that advance notice is not required except for policies related to tenant charges. This waiver is applicable until June 30, 2021.

PH -10: Tenant Notifications for Changes to Project Rules and Regulations – The St. Cloud HRA is required to provide 30-day notice to impacted families to changes in policies, rules and special charges before the changes are made. HUD is waiving the requirement for advance notice except for any changes

made to tenant charges. However, the St. Cloud HRA is required to notify impacted families within 30 days of making such changes. This waiver expires June 30, 2021.

PH -12: Public Housing Agency Annual Self-Inspections – Waives the requirement that the St. Cloud HRA must inspect each project. This waiver is applicable until December 31, 2020.

PH -13: Over-Income Limit: Termination Requirement – Waives the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination. As an alternative requirement, over-income families will remain public housing households instead of being terminated and will be charged the applicable FMR as the family's monthly rental amount. This waiver is applicable until June 30, 2021.

PH -14: Annual Chose of Rent – Allows families an additional opportunity to select an income-based or flat rent. This waiver is applicable until June 30, 2021.

11 a: PHAS – This waiver allows for alternatives related to inspections. The St. Cloud HRA will retain prior year PHAS score unless requests otherwise. The waiver is applicable until June 30, 2021.

11 b: SEMAP – This waiver allows the St. Cloud HRA to retain prior year SEMAP score unless requests otherwise. The waiver is applicable until June 30, 2021.

11 b-1: SEMAP – This waiver allows filed offices to perform a remote SEMAP confirmatory review instead of an on-site confirmatory review before changing a housing authorities rating from troubled to standard or high performer. The waiver expires on June 30, 2021.

11 c: Uniform financial reporting standards: Filing of financial reports: Reporting Compliance Dates – HUD is extending the required date for filing various financial reports. Ending date varies by the housing authorities fiscal year end date.

12 a: PHA Reporting Requirements on HUD Form 50058 – Form 50058 is normally required to be submitted within 60 calendar days from the effective date of any action recorded on line 2b of the form. This waiver extends the 60-day requirement to 90 days. If the HRA receives a fatal error report, the HRA will not be required to resubmit the form under this waiver. This waiver expires on December 31, 2020.

12 c: Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds – This waiver extends both the obligation end date and the expenditure end date of Capital Funds by 1 year.

MS -1: Mainstream Initial Lease Term – The St. Cloud HRA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice. This waiver is applicable until June 30, 2021.

MS -2: Mainstream Criminal Background Screening – The St. Cloud HRA may establish as an alternative requirement, screening requirements for applicants for Mainstream vouchers which are distinct from those in place for its HCV program in general. This waiver is applicable until June 30, 2021.

MS -3: Mainstream Age Eligibility to Enter HAP Contract Statutory Authority – As an alternative requirement, the St. Cloud HRA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract. This waiver is applicable until June 30, 2021.

Frequency of Request: One time.

Related Actions: None.

Future Action: None.

Relationship to Goals: Goal #2 - The St. Cloud HRA will promote fair housing and strive for high performance in HRA properties and housing subsidy programs.

Budget Impact: Any items listed in the waivers will fall under either the regular operating budget or the CARES Act funding.

This chart summarizes the waivers authorized under this Notice and the availability period for each. As stated in Section 5, PHAs must keep written documentation on the waivers applied by the PHA as well as the effective dates. To fulfill those requirements, PHAs may but are not required to utilize the last two columns to record this information.

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-1 PHA 5-Year and Annual Plan Submission Dates: Significant Amendment Requirements	<u>Statutory Authority</u> Section 5A(a)(1), Section 5A(b)(1), Section 5A(g), Section 5A(h)(2) <u>Regulatory Authority</u> §§ 903.5(a)(3), 903.5(b)(3), 903.13(c), 903.21, 903.23	<ul style="list-style-type: none"> Alternative dates for submission Changes to significant amendment process 	<ul style="list-style-type: none"> Varies based on FYE 12/31/20 	Yes – Alternative date is 1/16/2021	4/10/2020
PH and HCV-2 Family Income and Composition: Delayed Annual Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 982.516(a)(1), 960.257(a)	<ul style="list-style-type: none"> Permits the PHA to delay the annual reexamination of income and family composition HCV PHAs must implement HCV-7 for impacted families if they implement this waiver 	<ul style="list-style-type: none"> 6/30/21 All reexams due in CY20 must be completed by 12/31/20. Reexams due between 1/1/21 and 6/30/21 would need to be completed by 6/30/21.	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-3 Family Income and Composition: Annual Examination; Income Verification Requirements	<u>Regulatory Authority</u> §§ 5.233(a)(2), 960.259(c), 982.516(a) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy, including the use of EIV, and will allow PHAs to consider self-certification as the highest form of income verification • PHAs that implement this waiver will be responsible for addressing material income discrepancies that may arise later 	<ul style="list-style-type: none"> • 6/30/21 	yes	4/10/2020
PH and HCV-4 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> §§ 5.233(a)(2), 982.516(c)(2), 960.257(a), (b) and (d), 960.259(c) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the requirement to use the income verification requirements, including the use of EIV, for interim reexaminations 	<ul style="list-style-type: none"> • 6/30/21 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH and HCV-5 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives the mandatory EIV monitoring requirements 	<ul style="list-style-type: none"> • 6/30/21 	yes	7/2/2020
PH and HCV-6 Family Self-Sufficiency (FSS) Contract of Participation: Contract Extension	<u>Regulatory Authority</u> § 984.303(d)	<ul style="list-style-type: none"> • Provides for extensions to FSS contract of participation 	<ul style="list-style-type: none"> • 6/30/21 	yes	4/10/2020
PH and HCV-7 Waiting List: Opening and Closing; Public Notice	<u>Regulatory Authority</u> § 982.206(a)(2) <u>Sub-regulatory Guidance</u> Notice PIH 2012-34	<ul style="list-style-type: none"> • Waives public notice requirements for opening and closing waiting list • Requires alternative process 	<ul style="list-style-type: none"> • 6/30/21 	yes	4/10/2020
HQS-1 Initial Inspection Requirements	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(o)(8)(C)	<ul style="list-style-type: none"> • Changes initial inspection requirements, allowing for owner certification that there are no life-threatening deficiencies 	<ul style="list-style-type: none"> • 6/30/21 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
	<u>Regulatory Authority</u> §§ 982.305(a), 982.305(b), 982.405	<ul style="list-style-type: none"> Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification Will include reminder that HQS waiver does not include a waiver of 24 CFR 35.15, visual assessment for deteriorated paint 	1-year anniversary of date of owner's certification		
HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units	<u>Statutory Authority:</u> Section 8(o)(8)(A) <u>Regulatory Authority:</u> §§ 983.103(b), 983.156(a)(1)	<ul style="list-style-type: none"> Changes inspection requirements, allowing for owner certification that there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of date of owner's certification 		
HQS-3	<u>Statutory Authority</u>	<ul style="list-style-type: none"> Allows for extension of 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option	Section 8(o)(8)(A)(ii) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	up to 30 days for owner repairs of non-life threatening conditions			
HQS-4 HQS Initial Inspection Requirement: Alternative Inspection Option	<u>Statutory Authority</u> Section 8(o)(8)(A)(iii) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Under Initial HQS Alternative Inspection Option - allows for commencement of assistance payments based on owner certification there are no life-threatening deficiencies Where self-certification was used, PHA must inspect the unit no later than 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of date of owner's certification 	yes	4/10/2020
HQS-5 HQS Inspection	<u>Statutory Authority</u> Section 8(o)(D)	<ul style="list-style-type: none"> Allows for delay in biennial inspections 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Requirement: Biennial Inspections	<u>Regulatory Authority</u> §§ 982.405(a), 983.103(d)	<ul style="list-style-type: none"> PHAs must require owner certification there are no life-threatening deficiencies All delayed biennial inspections must resume by 6/30/21 and be completed by 12/31/21 	<ul style="list-style-type: none"> 12/31/21 		
HQS-6 HQS Interim Inspections	<u>Statutory Authority</u> Section 8(o)(8)(F) <u>Regulatory Authority</u> §§ 982.405(g), 983.103(e)	<ul style="list-style-type: none"> Waives the requirement for the PHA to conduct interim inspection and requires alternative method Allows for repairs to be verified by alternative methods 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
HQS-7 PBV Turnover Unit Inspections	<u>Regulatory Authority</u> § 983.103(c)	<ul style="list-style-type: none"> Allows PBV turnover units to be filled based on owner certification there are no life-threatening deficiencies Allows for delayed full HQS inspection NLT than 1-year anniversary 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		of date of owner's certification	date of owner's certification		
HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units	<u>Statutory Authority</u> Section 8(o)(8)(A) <u>Regulatory Authority</u> §§ 983.207(a), 983.207(b) <u>Sub-regulatory Guidance</u> HOTMA HCV Federal Register Notice January 18, 2017	<ul style="list-style-type: none"> Allows for PBV units to be added or substituted in the HAP contract based on owner certification there are no life-threatening deficiencies Allows for delayed full HQS inspection NLT 1-year anniversary of date of owner's certification 	<ul style="list-style-type: none"> 6/30/21 1-year anniversary of date of owner's certification 	yes	4/10/2020
HQS-9 HQS Quality Control Inspections	<u>Regulatory Authority</u> §§ 982.405(b), 983.103(e)(3)	<ul style="list-style-type: none"> Provides for a suspension of the requirement for QC sampling inspections 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
HQS-10 Housing Quality Standards: Space and Security	<u>Regulatory Authority</u> § 982.401(d)	<ul style="list-style-type: none"> Waives the requirement that each dwelling unit have at least 1 bedroom or living/sleeping room for each 2 persons. 	Remains in effect one year from lease term or date of this Notice, whichever is longer	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HQS-11 Homeownership Option: Initial HQS Inspection	<u>Statutory Authority</u> Section 8(o)(8)(A)(i), Section 8(y)(3)(B) <u>Regulatory Authority</u> § 982.631(a)	<ul style="list-style-type: none"> • Waives the requirement to perform an initial HQS inspection in order to begin making homeownership assistance payments • Requires family to obtain independent professional inspection 	<ul style="list-style-type: none"> • 6/30/21 		
HCV-1 Administrative Plan	<u>Regulatory Authority</u> § 982.54(a)	<ul style="list-style-type: none"> • Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 • Any provisions adopted informally must be adopted formally by 6/30/21 	<ul style="list-style-type: none"> • 3/31/21 • 6/30/21 	yes	4/10/2020
HCV-2 Information When Family is Selected: PHA Oral Briefing	<u>Regulatory Authority</u> §§ 982.301(a)(1), 983.252(a)	<ul style="list-style-type: none"> • Waives the requirement for an oral briefing • Provides for alternative methods to conduct required voucher briefing 	<ul style="list-style-type: none"> • 6/30/21 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-3 Term of Voucher: Extensions of Term	<u>Regulatory Authority</u> § 982.303(b)(1)	<ul style="list-style-type: none"> Allows PHAs to provide voucher extensions regardless of current PHA policy 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
HCV-4 PHA Approval of Assisted Tenancy: When HAP Contract is Executed	<u>Regulatory Authority</u> § 982.305(c)	<ul style="list-style-type: none"> Provides for HAP payments for contracts not executed within 60 days PHA must not pay HAP to owner until HAP contract is executed 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
HCV-5 Absence from Unit	<u>Regulatory Authority</u> § 982.312	<ul style="list-style-type: none"> Allows for PHA discretion on absences from units longer than 180 days PHAs must not make HAP payments beyond 12/31/20 for units vacant more than 180 consecutive days 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-6 Automatic Termination of HAP Contract	<u>Regulatory Authority</u> § 982.455	<ul style="list-style-type: none"> Allows PHA to extend the period of time after the last HAP payment is made before the HAP contract terminates automatically. 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
HCV-7 Increase in Payment Standard During HAP Contract Term	<u>Regulatory Authority</u> § 982.505(c)(4)	<ul style="list-style-type: none"> Provides PHAs with the option to increase the payment standard for the family at any time after the effective date of the increase, rather than waiting for the next regular reexamination. 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
HCV-8 Utility Allowance Schedule: Required Review and Revision	<u>Regulatory Authority</u> § 982.517	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
HCV-9 Homeownership Option: Homeownership Counseling	<u>Statutory Authority</u> Section 8(y)(1)(D) <u>Regulatory Authority</u> §§ 982.630, 982.636(d)	<ul style="list-style-type: none"> Waives the requirement for the family to obtain pre-assistance counseling 	<ul style="list-style-type: none"> 6/30/21 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-10 Family Unification Program (FUP): FUP Youth Age Eligibility to Enter HAP Contract	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to increase age to 26 for foster youth initial lease up 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
HCV-11 Family Unification Program (FUP): Length of Assistance for Youth	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to suspend terminations of assistance for FUP youth who will reach the 36-month limit between April 10, 2020, and December 31, 2020 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
HCV-12 Family Unification Program (FUP): Timeframe for Referral	<u>Statutory Authority</u> Section 8(x)(2)	<ul style="list-style-type: none"> Allows PHAs to accept referrals of otherwise eligible youth who will leave foster care within 120 days 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
HCV-13 Homeownership: Maximum Term of Assistance	<u>Regulatory Authority</u> § 982.634(a)	<ul style="list-style-type: none"> Allows a PHA to extend homeownership assistance for up to 1 additional year 	<ul style="list-style-type: none"> 6/30/21 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
HCV-14 Mandatory Removal of Unit from PBV HAP Contract	<u>Regulatory Authority</u> §§ 983.211(a); 983.258	<ul style="list-style-type: none"> Allows a PHA to keep a PBV unit under contract for a period of time that extends beyond 180 from the last HAP but does not extend beyond December 31, 2020 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
PH-1 Fiscal Closeout of Capital Grant Funds	<u>Regulatory Authority</u> § 905.322(b)	<ul style="list-style-type: none"> Extension of deadlines for ADCC and AMCC 	Varies by PHA	yes	4/10/2020
PH-2 Total Development Costs	<u>Regulatory Authority</u> § 905.314(c) - (d)	<ul style="list-style-type: none"> Waives the TDC and HCC limits permitting approval of amounts in excess of published TDC by 25% to 50% on a case by case basis 	Applies to development proposals submitted to HUD no later than December 31, 2021		
PH-3 Cost and Other Limitations: Types of Labor	<u>Regulatory Authority</u> § 905.314(j)	<ul style="list-style-type: none"> Allows for the use of force account labor for modernization activities in certain circumstances 	<ul style="list-style-type: none"> 6/30/21 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH-4 ACOP: Adoption of Tenant Selection Policies	<u>Regulatory Authority</u> § 960.202(c)(1)	<ul style="list-style-type: none"> Establishes an alternative requirement that policies may be adopted without board approval until 3/31/21 Any provisions adopted informally must be adopted formally by 6/30/21 	<ul style="list-style-type: none"> 3/31/21 6/30/21 	yes	4/10/2020
PH-5 Community Service and Self-Sufficiency Requirement (CSSR)	<u>Statutory Authority</u> Section 12(c) <u>Regulatory Authority</u> §§ 960.603(a) and 960.603(b)	<ul style="list-style-type: none"> Temporarily suspends CSSR 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
PH-6 Energy Audits	<u>Regulatory Authority</u> § 965.302	<ul style="list-style-type: none"> Allows for delay in due dates of energy audits 	<ul style="list-style-type: none"> 12/31/21 	yes	12/16/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH-7 Over-Income Families	<u>Statutory Authority</u> Section 16(a)(5) <u>Sub-regulatory Guidance</u> Housing Opportunity Through Modernization Act of 2016: Final Implementation of the Public Housing Income Limit 83 FR 35490, Notice PIH 2019-11	<ul style="list-style-type: none"> Changes to timeframes for determination of over-income when a delay in the annual reexamination occurs as a result of adoption of waiver PH and HCV-2 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020
PH-8 Resident Council Elections	<u>Regulatory Authority</u> § 964.130(a)(1)	<ul style="list-style-type: none"> Provides for delay in resident council elections 	<ul style="list-style-type: none"> 6/30/21 		
PH-9 Review and Revision of Utility Allowance	<u>Regulatory Authority</u> § 965.507	<ul style="list-style-type: none"> Provides for delay in updating utility allowance schedule 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
PH-10 Tenant Notifications for Changes to Project Rules and Regulations	<u>Regulatory Authority</u> § 966.5	<ul style="list-style-type: none"> Advance notice not required except for policies related to tenant charges 	<ul style="list-style-type: none"> 6/30/21 	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
PH-11 Designated Housing Plan Renewals	<u>Statutory Authority</u> Section 7(f)	<ul style="list-style-type: none"> Extends the Plan's effective period through June 30, 2021 for Plans due to expire between July 2, 2020 and June 30, 2021 	<ul style="list-style-type: none"> 6/30/21 		
PH-12 Public Housing Agency Annual Self-Inspections	<u>Statutory Authority</u> Section 6(f)(3) <u>Regulatory Authority</u> § 902.20(d)	<ul style="list-style-type: none"> Waives the requirement that the PHA must inspect each project 	<ul style="list-style-type: none"> 12/31/20 	yes	12/16/2020
PH-13 Over-Income Limit: Termination Requirement	<u>Statutory Authority</u> Section 16(a) as amended by section 103 of HOTMA Implementation Notice: Housing Opportunity Through Modernization Act of 2016: Final Implementation of Public Housing Income Limit, 83 Fed. Reg. 35,490 (July 26, 2018)	<ul style="list-style-type: none"> Waives the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination. As an alternative requirement, over-income families will remain public housing 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		households instead of being terminated and will be charged the applicable FMR as the family's monthly rental amount.			
PH-14 Annual Choice of Rent	<u>Statutory Authority:</u> 42 USC 1437a(a)(2)(A) <u>Regulatory Authority</u> § 960.253	<ul style="list-style-type: none"> Allows families an additional opportunity to select an income-based or flat rent 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020
11a PHAS	<u>Regulatory Authority</u> 24 CFR Part 902	<ul style="list-style-type: none"> Allows for alternatives related to inspections PHA to retain prior year PHAS score unless requests otherwise 	HUD will resume issuing new PHAS scores starting with PHAs with FYE dates of 6/30/21	yes	12/16/2020
11b SEMAP	<u>Regulatory Authority</u> 24 CFR Part 985	<ul style="list-style-type: none"> PHA to retain prior year SEMAP score unless requests otherwise 	HUD will resume issuing new SEMAP scores starting with PHAs with FYE dates of 06/30/21	yes	12/16/2020
11b-1	<u>Regulatory Authority</u>	<ul style="list-style-type: none"> Allows field offices to 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
SEMAP	§ 985.105(d)	perform a remote SEMAP confirmatory review instead of an on-site confirmatory review before changing a PHA's rating from troubled to standard or high performer			
11b-2 SEMAP	<u>Regulatory Authority</u> § 985.101(a)	<ul style="list-style-type: none"> • Waives the requirement for PHAs to submit an annual SEMAP certification in PIC within 60 days of FYE during the period of time that HUD will roll forward prior year SEMAP scores 	<ul style="list-style-type: none"> • 6/30/21 	yes	12/16/2020
11c Uniform Financial Reporting Standards: Filing of Financial Reports; Reporting Compliance Dates	<u>Regulatory Authority</u> §§ 5.801(c), 5.801(d)(1)	<ul style="list-style-type: none"> • Allows for extensions of financial reporting deadlines 	Varies by PHA FYE	yes	4/10/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
12a PHA Reporting Requirements on HUD Form 50058	<u>Regulatory Authority</u> 24 CFR Part 908, § 982.158 <u>Sub-regulatory Guidance</u> Notice PIH 2011-65	<ul style="list-style-type: none"> • Waives the requirement to submit 50058 within 60 days • Alternative requirement to submit within 90 days of the effective date of action 	<ul style="list-style-type: none"> • 12/31/20 	yes	4/10/2020
12b Designated Housing Plans: HUD 60-Day Notification	<u>Statutory Authority</u> Section 7(e)(1)	<ul style="list-style-type: none"> • Allows for HUD to delay notification about designated housing plan 	<ul style="list-style-type: none"> • 7/31/20 		
12c Extension of Deadline for Programmatic Obligation and Expenditure of Capital Funds	<u>Statutory Authority</u> Section 9(j) <u>Regulatory Authority</u> § 905.306(d)(5)	<ul style="list-style-type: none"> • Provides an 18-month extension 	For all open Capital Fund grants, an 18-month extension from the obligation and expenditure end dates in LOCCS as of April 10, 2020	yes	4/10/2020
12d Section 6(j) 1- and 2-Year Substantial Improvement	<u>Statutory Authority</u> Section 6(j)(3)(B)(ii)	<ul style="list-style-type: none"> • For PHAs designated as troubled prior to the date of this Notice that have not received a PHAS 	The period of availability for this waiver and alternative		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Requirements	<u>Regulatory Authority</u> 24 CFR § 902.75(d)	assessment for the first full fiscal year after the initial notice of the troubled designation, HUD will: (1) evaluate the 1-year substantial improvement benchmark based on the first released score for fiscal years ending on or after June 30, 2022; and, (2) toll the evaluation of the 2-year recovery benchmark to the next sequential fiscal year	requirement: (1) is effective on the date of this Notice; and, (2) will continue through June 30, 2023, at which time HUD will reevaluate any additional impacts of this waiver on any PHA in the process of being evaluated.		
MR-1 Family Income and Composition: Delayed Annual Examination	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR § 882.515(a)	<ul style="list-style-type: none"> • Waives statutory and regulatory requirement to permit PHAs to delay annual reexaminations of Mod Rehab families 	<ul style="list-style-type: none"> • 6/30/21 		
MR-0 Family Income and Composition: Annual examination; Income	<u>Regulatory Authority:</u> §5.233(a)(2) <u>Sub-regulatory Guidance</u>	<ul style="list-style-type: none"> • Waives the requirements to use the income hierarchy described by Notice PIH 	<ul style="list-style-type: none"> • 6/30/21 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
Verification Requirements	Notice PIH 2018-18	2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV, if the PHA wishes to conduct the annual reexam rather than delaying the family's annual reexam as permitted under MR-1			
MR-3 Family Income and Composition: Interim Examinations	<u>Statutory Authority</u> Section 3(a)(1) <u>Regulatory Authority</u> 24 CFR §§ 5.233(a)(2), 882.515(b) <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> • Waives requirements to use the income verification hierarchy as described by Notice PIH 2018-18. Allows PHAs to forgo third-party income verification requirements for interim reexams, including the required use of EIV 	<ul style="list-style-type: none"> • 6/30/21 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		<ul style="list-style-type: none"> During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexams 			
MR-4 Enterprise Income Verification (EIV) Monitoring	<u>Regulatory Authority</u> § 5.233 <u>Sub-regulatory Guidance</u> Notice PIH 2018-18	<ul style="list-style-type: none"> Waiving the mandatory EIV monitoring requirements. 	<ul style="list-style-type: none"> 6/30/21 		
MR-5 PHA Inspection Requirement: Annual Inspections	<u>Regulatory Authority</u> § 882.516(b)	<ul style="list-style-type: none"> Waives the annual inspection requirement and allows PHAs to delay annual inspections for Mod Rehab units All delayed annual inspections must be completed as soon as reasonably possible but 	<ul style="list-style-type: none"> 6/30/21 		

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		no later than one year after the date the annual inspection would have been required absent the waiver			
MR-6 Adjustment of Utility Allowance	<u>Regulatory Authority</u> § 882.510	<ul style="list-style-type: none"> • Waives the requirement to allow PHAs to delay the review and update of utility allowances 	<ul style="list-style-type: none"> • 6/30/21 		
MS-1 Mainstream Initial Lease Term	<u>Statutory Authority</u> Section 8(o)(7)(A) <u>Regulatory Authority</u> § 982.309(a)(2)(ii)	<ul style="list-style-type: none"> • PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice 	<ul style="list-style-type: none"> • 6/30/21 	yes	12/16/2020
MS-2 Mainstream Criminal Background Screening	<u>Statutory Authority</u> 42 U.S.C. 13663(a), 42 U.S.C. 13661 <u>Regulatory Authority</u> §§ CFR 5.856, 982.553(a)	<ul style="list-style-type: none"> • PHAs may establish, as an alternative requirement, screening requirements for applicants for Mainstream vouchers 	<ul style="list-style-type: none"> • 6/30/21 	yes	12/16/2020

Item	Statutory and regulatory waivers	Summary of alternative requirements	Availability Period Ends	Did the PHA implement the waiver or alternative requirement?	Date of PHA adoption.
		which are distinct from those in place for its HCV program in general			
MS-3 Mainstream Age Eligibility to Enter HAP Contract Statutory Authority	<u>Statutory Authority</u> 42 U.S.C. 8013(k)(2)	<ul style="list-style-type: none"> As an alternative requirement, the PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract 	<ul style="list-style-type: none"> 6/30/21 	yes	12/16/2020

COVID-19 Statutory and Regulatory Waivers for ONAP programs		
Item	Statutory and Regulatory Waivers	Waiver/Alternative Requirement Summary
13a. Application Process for IHBG-CARES Grants and Indian Housing Plan (IHP) Requirements	Statutory Authority: Section 101(b), Section 102, and Section 103 of NAHASDA Regulatory Authority: 24 C.F.R. §§ 1000.214; 1000.218; 1000.220; 1000.224; 1000.226; 1000.228; 1000.230; and 1000.232	<i>Abbreviated IHP to Receive IHBG-CARES Grant Funding:</i> Applicants for IHBG-CARES funding must submit an abbreviated IHP specifying how the funds will be used.
		<i>Recipients that did Not Submit an IHP in FY2020:</i> A Tribe or TDHE that did not submit a timely or compliant IHP in FY 2020 may still qualify for an IHBG-CARES grant.
		<i>IHP Certifications:</i> IHBG recipients that cannot provide HUD with IHP certifications may still submit an Abbreviated IHP provided an authorized official of the IHBG recipient provides a statement on inability to secure certifications.
		<i>Reprogramming of FY2020 IHBG Funding:</i> FY2020 IHBG funds may be reprogrammed to address COVID-19 through streamlined process.

13b. IHP Submission Deadline for Annual IHBG Formula Grants	Statutory Authority: Section 101(b) and 102(a) of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.214, 1000.216, 1000.225	IHP Submission Deadlines Extended	Original IHP Due Date	Extension
			1/17/2020	10/16/2020
			4/17/2020	10/16/2020
			7/18/2020	1/17/2021
13c. Annual Performance Report Submission Deadline	Statutory Authority: Sections 403 and 404 of NAHASDA, Regulatory Authority: 24 CFR § 1000.514	APR Submission Deadlines Extended	Original APR Due Date	Extension
			3/30/2020	9/27/2020
			6/29/2020	12/30/2020
			9/30/2020	12/30/2020
13d. Income Verification	Regulatory Authority: 24 CFR § 1000.128	IHBG recipients may deviate from their current written admissions and occupancy policies, including allowing less frequent income recertifications, remote income verification, and self-certification over the phone or email.		
13e. Public Health Services	Statutory Authority: Section 202(3) of NAHASDA	Recipients may use IHBG-CARES funding to carry out a wide range of public health services.		

13f. COVID-19-Related Assistance to Non-Low Income and Non-Native Families	Statutory Authority: Section 201(b) of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.104, 1000.106, 1000.108, 1000.110, 1000.312, 1000.314, 1000.318	Recipients may use IHBG-CARES funding to prevent, prepare for, and respond to COVID-19 through certain limited activities that provide assistance to all affected and threatened people without regard to income limits or Indian status.
13g. Useful Life	Statutory Authority: Section 205 of NAHASDA, Regulatory Authority: 24 CFR §§ 1000.141, 1000.142, 1000.143, 1000.144, 1000.146, 1000.147	If the assistance is related to inhibiting the spread of COVID-19 to low-income Indian families and the Tribal community, Recipients may use IHBG-CARES funding to assist housing units without determining and maintaining affordability during their useful life.
13h. Total Development Cost (TDC) Limits	Regulatory Authority: 24 CFR §§ 1000.156, 1000.158, 1000.160, 1000.162	Recipients may exceed TDC by 20 percent without HUD approval for dwelling and non-dwelling units developed, acquired or assisted to prevent, prepare for, and respond to COVID-19.
13i. Prohibition Against Investment of CARES Act	Statutory Authority: Section 204(b) of NAHASDA, Regulatory Authority: 24 CFR	Recipients are prohibited from investing any IHBG funding provided under the CARES Act.

Grant Funds	§ 1000.58	
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13j. IHBG-CARES Funds Not Counted in Undisbursed Funds Factor	Regulatory Authority: 24 CFR § 1000.342	IHBG-CARES funds will not count towards an IHBG recipient's prior years' undisbursed funds when applying the Undisbursed Funds Factor under the IHBG formula.
14a. Citizen Participation	<p>Statutory Authority: Section 104 of the Housing and Community Development Act of 1974 (HCD Act)</p> <p>Regulatory Authority: 24 CFR § 1003.604</p>	Indian tribes are not required to hold one or more meetings to obtain the views of residents before applying for ICDBG-CARES grant funding or amending their FY 2019/2020 ICDBG grants to address COVID-19.
<p>14b. Application Process for ICDBG-CARES Grants and Funding Criteria</p> <p>Regulatory Authority: 24 CFR §§ 1003.400, 1003.401, 1003.402; Section I.A.1.b. of FY19/20 ICDBG Notice of Funding Availability (NOFA)</p>		<p><i>1) Criteria for Funding:</i> With respect to applications for ICDBG-CARES grants and FY 2019/2020 ICDBG Imminent Threat grants to address the COVID-19 crisis, the urgency and immediacy of the threat will be presumed.</p>
		<p><i>2) Grant Ceilings:</i> Current grant ceilings are waived for ICDBG-CARES and will be set in an ICDBG-CARES Implementation Notice to be published in the very near future.</p>
		<p><i>3) Reimbursement of Costs and Letter to Proceed:</i> ICDBG applicants and grantees to receive ICDBG-CARES grants do not have to demonstrate other Tribal funding sources cannot be made available to alleviate the threat and may use the funding to cover or reimburse costs to prevent, prepare for, and respond to COVID-19 without a Letter to Proceed from the area ONAP.</p>

		<p><i>4) Availability of Funds:</i> If ICDBG-CARES grant funds are not awarded in a fiscal year, HUD reserves the right to adjust how funding is awarded to ensure needs of Tribes are met, including possibly setting aside a portion of funding to address the needs of Tribes with the greatest needs.</p>
14c. Removal of Public Services 15 Percent Cap under FY 2019 and FY 2020 ICDBG Grants	<p>Statutory Authority: Section 105 of the HCD Act; Regulatory Authority: 24 CFR § 1003.201(e); FY 19/20 ICDBG NOFA</p>	<p>HUD is eliminating the 15 percent cap on FY 2019/2020 ICDBG funding (both Single Purpose and Imminent Threat grants).</p>
14d. Rental Assistance, Utility Assistance, Food, Clothing, and Other Emergency Assistance	<p>Statutory Authority: Section 105 of the HCD Act; Regulatory Authority: 24 CFR § 1003.207(b)(4)</p>	<p>ICDBG grant funds may be used to provide emergency payments for low and moderate income individuals or families impacted by COVID-19 for items such as food, medicine, clothing, and other necessities, as well as utility payment assistance.</p>
14e. Purchase of	Regulatory Authority: 24 CFR	Grantees may use of ICDBG funds for the purchase of medical and

Equipment	§§ 1003.207(b)(1); 1003.201(c)(1)(ii)	personal protective equipment to prevent, prepare for, and respond to the COVID-19.
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14f. Operating Expenses for Public Facilities	Regulatory Authority: 24 CFR § 1003.207(b)(2)	Grantees may use ICDBG funds to pay operating and maintenance expenses of any public facility, to the extent it is used for COVID-19-related purposes but not for staffing costs of public facilities.
14g. New Housing Construction by Tribes	Statutory Authority: Section 105 of the HCD Act, Regulatory Authority: 24 CFR § 1003.207(b)(3)	ICDBG grantees may use ICDBG funds to carry out new housing construction under certain conditions without having to use a CBDO.

To: St. Cloud HRA Board of Commissioners

From: Louise Reis, Executive Director and Karen Rizer, Finance Director

Date: December 10, 2020

Subject: Policies 05.18 and 05.19 for Emergency Paid Sick Leave and Emergency Family Medical Leave

Requested Action: Approve extending expiration date of Policies 05.18 and 05.19 to December 31, 2021.

Background: Policy 05.18 was adopted as required by Federal regulations. It is set to expire on December 31, 2020. As the numbers of COVID-19 cases are now higher than they were when this policy was adopted, management feels it would be prudent to extend policies 05.18 and 05.19 through December 31, 2021.

This policy provides 36 employees approximately 3,000 hours of Emergency Paid Sick Leave should they meet the requirements. To date, it has been used by 7 employees totaling 311 hours. One employee has used the Emergency Family Medical Leave, totaling 87 hours.

Frequency of Request: Once.

Related Actions: None.

Future Action: Unknown.

Budget Impact: Benefits are budgeted for each fund.

St. Cloud Housing and Redevelopment Authority
Personnel Policy Manual

Topic: Families First Coronavirus Response Act Policy
Section: Benefit Policies
Number: 05.18

Page 1 of 3
Date Issued: 4-1-20

Statement of Policy

It is the policy of the St. Cloud Housing and Redevelopment Authority (HRA) to comply with the requirements of the Federal Families First Coronavirus Response Act (FFCRA). The FFCRA provides employees with Emergency Paid Sick Leave (EPSL) and Emergency Paid Family and Medical Leave (EFMLA) for those affected by the COVID-19 pandemic, from April 1, 2020 through December 31, 2020.

Two Types of Leave Covered Under FFCRA

Emergency Paid Sick Leave (EPSL)

Emergency paid sick leave will be available for an employee who is unable to work or work remotely because:

1. The employee is subject to a federal, state, or local quarantine or isolation order related to COVID-19;
2. The employee has been advised by a health care provider to self-quarantine because of COVID19;
3. The employee is experiencing symptoms of COVID-19 and is seeking a medical diagnosis;
4. The employee is caring for an individual subject (or advised) to quarantine or isolation;
5. The employee is caring for a son or daughter whose school or place of care is closed, or childcare provider is unavailable, due to COVID-19 precautions; or
6. The employee is experiencing substantially similar conditions as specified by the Secretary of Health and Human Services, in consultation with the Secretaries of Labor and Treasury.

Eligibility for EPSL

All employees, regardless of their tenure with the HRA, with full-time or part-time status are eligible to receive this benefit.

Paid Benefits for EPSL

Eligible employees will receive up to two weeks of paid sick leave.

- Full-time employees: 80 hours at their regular rate of pay, subject to caps and reasons noted below.
- Part-time employees: the number of hours that the employee works, on average, over a two-week period, subject to caps and reasons noted below.

Payments are capped at \$511 a day (\$5,110 in total) for dealing with an employee's own illness or quarantine (reasons 1, 2 and 3 above). Employees who are caring for an individual affected by COVID-19 and those whose children's schools have closed (reasons 4, 5 and 6 above) receive up to two-thirds of their pay, and that benefit is limited to \$200 a day (\$2,000 in total). Employees may choose to use existing paid leave to supplement the amount received, up to normal earnings.

Return to Work Following EPSL

Employees are required to follow guidelines established by the [Centers for Disease Control and Prevention](#) as it relates to ceasing home isolation practices.

2). Emergency Family Medical Leave Act (EFMLA) Expansion

Employees will be entitled to take up to 12 weeks of job-protected leave if an employee is unable to work or work remotely due to caring for the employee's son or daughter (who is under 18) because the child's school or place of care has been closed or his or her childcare provider is unavailable due to the public health emergency.

Eligibility for EFMLA

Under this policy, full-time and part-time employees who have been employed by the HRA for 30 days, prior to taking the leave, are eligible for leave.

Paid Benefits for EFMLA

The EFMLA provides for a combination of unpaid and paid leave.

- The first 10 days of EFMLA may be unpaid. An employee may choose to take the HRA's existing paid leave benefit during the 10-day unpaid period, or the 10 days may be paid under EPSL, if taken for a qualifying reason.
- After ten days of unpaid leave, employees are entitled to 10 weeks of job-protected leave at two thirds their usual pay. Part-time employees are entitled to be paid two-thirds of their usual pay based on the average number of hours worked for the six months prior to taking the leave.
- The cap of the paid leave entitlement for employees is \$200 per day (\$10,000 in the aggregate).
- Employees may choose to use existing paid leave to supplement the amount received, up to normal earnings.

Notifying the HRA of the Need for FFCRA Leave

Employees should request their need for leave under the FFCRA as soon as possible, by notifying their Supervisor and filling out the request form(s). If an employee is incapacitated, the employee's representative should give verbal notice as soon as possible. Calling in "sick" does not qualify as adequate notice. An employee must provide sufficient information regarding the reason for an absence for the HRA to know that protection and benefits may exist under this policy.

Insurance Benefit Continuation During FFCRA Leave

Coverage under group health insurance will continue while on leave, but employees must continue to pay their portion of the premium. Other employment benefits [*such as dental insurance, life insurance, AD&D, etc.*] will also be continued during the leave, as long as the employee continues to pay any required contribution.

Certification for FFCRA Leave

Generally, the HRA will require certification to verify the qualifying reason for the leave. Employees should be prepared to provide documentation such as a copy of any quarantine or isolation order, or written note by a health care provider advising self-quarantine, or a notice of closure of school or childcare provider (i.e. email, notification on website, or news article).

We understand that requesting healthcare provider documentation may place additional burdens on our medical community during this pandemic, therefore if an employee is unable to obtain this documentation, at a minimum, the name, address, and phone number of your treating healthcare provider must be provided. The HRA also reserves the right to request additional documentation completed by your healthcare provider or childcare provider (as applicable) in situations where there is reason to believe an employee has fraudulently obtained leave or paid benefits.

Intermittent Leave

For employees working on HRA premises, intermittent leave will only be permitted for the qualifying reason related to caring for their minor child whose school or place of care is closed, or childcare provider is unavailable.

For employees working remotely, intermittent leave will be permitted if the employee is unable to work his or her normal schedule of hours. The employee and employer will come to an agreement on a schedule that provides for the least amount of disruption to an employee's job. For EFLMA purposes, the total amount of leave taken in should not exceed the 12 weeks defined earlier in this policy.

Rights Upon Return from FFCRA Leave

An employee who takes leave under this policy may be reinstated to the same job or an equivalent position upon completion of the leave. If an individual has exhausted all leave under this policy and is still unable to return to work, the situation will be reviewed on a case-by-case basis to determine what rights and protections might exist.

The law provides that an employee has no greater rights upon a return from leave than the individual would have had if s/he had continued to work. Therefore, an employee may be affected by a layoff, reorganization, furlough, change in job duties or other change in employment if the action would have occurred had the employee remained actively at work.

**St. Cloud Housing and Redevelopment Authority
Personnel Policy Manual**

Topic: Emergency Sick Leave Policy
Section: Benefit Policies
Number 05.19

Page 1 of 1
Date Issued: 8-26-20

If an employee has exhausted all their Paid Leave and cannot work because they have a serious health condition or are caring for a spouse or child with a serious health condition, the employee may use any remaining Emergency Paid Sick Leave (EPSL) balance. The employee may be required to provide a physician's statement. Payments are at the employee's regular rate of pay, capped at \$511 a day (\$5,110 in total) for dealing with an employee's own illness. Employees who are caring for a spouse or child with a serious health condition receive up to two-thirds of their pay, and that benefit is limited to \$200 a day (\$2,000 in total). This policy will be in effect for as long as the HRA is required by Federal regulation to provide EPSL.

TO: HRA Board of Commissioners

FROM: Louise Reis, Executive Director

DATE: December 9, 2020

SUBJECT: Report on Activities

HUD Compliance Review: The Minneapolis HUD Field Office sent the written report on the compliance monitoring review. I have attached a copy of the report for your information. Page 3 of the report indicates the concerns and findings. Our office will be providing a response to the report indicating the correction action that was taken or is planned.

The Creeks Townhomes: The Creeks Townhomes had a compliance monitoring review with Affordable Housing Connection during the month of October. This review was completed remotely and we received word on October 30, 2020 that no compliance violations or areas of concern were noted.

Beyond Backgrounds: Earlier this year, our office worked with Housing Link to create a landlord risk mitigation fund. We were informed in November that the grant application was successful and Housing Link has reserved 10 slots in the landlord risk mitigation fund for our homeless voucher holders that are struggling to secure housing. The fund will hold monies in reserve for a landlord that is willing to rent a unit to a household that has barriers such as poor credit, lack of rental history and/or a criminal record. The program is called Beyond Backgrounds.

Rent Collection: Updated rent collection numbers will be provided at the meeting.

Housing Choice Voucher Program: During October, there were six housing choice vouchers released. Four of the vouchers were voluntary released, and two were due to death. Two of the voucher holders were over the age of 62. For the month of November, there were six housing choice vouchers released. Two were voluntary released, one was due to death and three were for program violations. Two were over the age of 62.

As of October 31, 2020 – we have 240 Port In vouchers and 29 Port Out. For November 30, 2020 – we have 243 Port In vouchers and 30 Port Out vouchers.

CDBG Update:

For the homeowner rehab program:

- 4 in construction
- 1 in scope of work
- 4 in application stage
- 3 on the waiting list

Housing Department Vacancy Report – For the Month Ending November 30, 2020

Fund: Public Housing – 291 Units			
		Yearly	Vacant
<u>Complex</u>	<u># of units</u>	<u>Vacancy Rate</u>	<u>11/30/20</u>
Empire	89	2.22%	0
Wilson	126	0.76%	0
Scattered Sites	76	0.94%	1

Fund: Section 8 New Construction – 162 Units			
		Yearly	Vacant
<u>Complex</u>	<u># of units</u>	<u>Vacancy Rate</u>	<u>11/30/20</u>
Germain	60	0.40%	0
Grace/NWB	102	1.72%	2

Fund: Tax Credit – 249 Units			
		Yearly	Vacant
<u>Complex</u>	<u># of units</u>	<u>Vacancy Rate</u>	<u>11/30/20</u>
Creeks	24	2.11%	1
Brownstones	12	2.27%	0
Swisshelm One	32	2.96%	0
Westwood One	32	3.53%	0
Swisshelm Two	32	3.81%	1
Westwood Two	32	2.02%	0
Riverside	85	0.97%	2

Fund: Affordable Housing – 79 Units			
		Yearly	Vacant
<u>Complex</u>	<u># of units</u>	<u>Vacancy Rate</u>	<u>11/30/20</u>
Eastwood	18	3.02%	2
Loehr	61	2.47%	1



U.S. Department of Housing and Urban Development

Minneapolis Field Office
212 Second Avenue South, Suite 150
Minneapolis, Minnesota 55401
www.hud.gov

November 30, 2020

Ms. Louise Reis, Executive Director
St. Cloud HRA
1225 West Saint Germain St.
St. Cloud, MN 56301

SUBJECT: PHA Compliance Monitoring Review Report Transmittal

Dear Ms. Reis:

This letter is to transmit the results of the remote compliance monitoring review that the Minneapolis HUD Office of Public Housing (OPH) conducted on the St. Cloud Housing and Redevelopment Authority (SCHRA). This review occurred from April 15 to May 27, 2020, and August 19 to October 15, 2020.

The review team was comprised of seven OPH staff and the objective of the team was to perform a limited review focused on compliance with program requirements and regulations. While performance issues may be noted in this report, the primary focus is compliance. Rather than examining any one area exhaustively, this review touches on multiple areas of compliance to provide the Authority with meaningful feedback for sustained compliance. OPH staff reviewed SCHRA's policies, procedures, logs, and supporting documentation to determine compliance with HUD regulations and guidance in both the Public Housing and the Section 8 Housing Choice Voucher programs. All information was provided and reviewed remotely due to COVID-19 restrictions and SCHRA staff and board members were also interviewed remotely on program policy and procedures.

The results of the review are enclosed in the attached report. It includes discussion of areas where the Authority's performance and compliance are strong, as well as recommendations for ongoing improvement in areas of concern and required corrective actions due to findings. Please see the final page for more information on your required response and due dates.

If you have questions or concerns, please contact Mark Wunderlich via email at Mark.E.Wunderlich@hud.gov. We appreciate your cooperation.

Sincerely,

11/30/2020

X

Lucia M. Clausen
Director, Public and Indian Housing
Signed by: LUCIA CLAUSEN

Cc: Nancy Gohman, Board Chairperson
1225 West Saint Germain St., St. Cloud, MN 56301

Compliance Monitoring Review

*St. Cloud Housing and Redevelopment Authority
October 2020*

Executive Summary

The St. Cloud HRA (SCHRA) was selected for a Compliance Monitoring Review by HUD's Office of Public Housing in 2020. Minneapolis Field Office (FO) staff reviewed the Authority's programs and compliance with HUD program requirements and regulations. As further detailed in this report, the review team found areas in which SCHRA was out of compliance, areas in which SCHRA can improve, and areas in which SCHRA is very strong.

Background

The SCHRA is a Public Housing Authority (PHA) located in St. Cloud, MN, operating and administering a low-rent Public Housing (PH) program and a Section 8 Housing Choice Voucher (HCV) program with 291 PH units and 951 HCVs. The SCHRA has recently expanded with 39 Mainstream Vouchers and one Family Unification Program (FUP) award. The agency received High Performer designations for their most recent Public Housing Assessment System (PHAS) and the Section Eight Management Assessment Program (SEMAP) scores.

Review Results

As stated in the cover letter, these results touch on multiple areas of compliance to provide the Authority with meaningful feedback. The review team looked at the following categories: Management and Governance of the PHA by reviewing SCHRA's bylaws, board minutes, policies, and supporting materials; HCV through the review of SCHRA's voucher utilization, reporting, Housing Assistance Payments (HAP) register, financial statements, HCV policies, payment standards, utility allowance schedule(s), tenant files, and supporting materials; and PH through the review of SCHRA's PH occupancy, year-to-date financial statements, lead-based paint testing results, work orders, tenant accounts receivable, unit/development conditions, tenant files, and supporting materials.

Results of the Compliance Monitoring Review are presented below in three categories: Findings, which are items of regulatory violations found during the review; Concerns, which are items found during the review that do not rise to the level of finding; and Observations, which are positive items the review team found important enough to include in this report. To make your review of these results more efficient, we have listed all items in order by Observations, Concerns, and then Findings. Please note that these may not be all-encompassing of SCHRA's status but what was found during the review. We ask that you discuss this information with the SCHRA Board and staff.

Observations

- **Observation 1:** Although the COVID-19 pandemic prevented the opportunity to conduct an onsite review, the SCHRA was very responsive and successfully provided all documentation electronically as requested by the HUD FO. The SCHRA provided accurate and applicable documentation in order to conduct the review. This remote review was conducted with efficiency and expediency thanks to SCHRA.
- **Observation 2:** The SCHRA grievance evidence, hearings, and results were well documented. The grievance proceedings were conducted in a timely and fair manner. The findings were followed through by the SCHRA and further documented.
- **Observation 3:** A review of SCHRA's Board Minutes indicates that financials are provided to the Board and reviewed on a monthly basis. SCHRA's year-end audit is provided to the Board in April of each year and all questions, concerns and audit findings (if applicable) are discussed at the May Board meeting. The Board has adequate time to review financials and the year-end audit. The Board provides feedback to HRA staff before the audit submission is due to HUD in September.
- **Observation 4:** SCHRA has documented Financial and Internal Control policies in place to facilitate proper financial oversight of the HRA. A review of the HRA's financial policies indicates that proper segregation of duties has been implemented at the HRA so that no financial transaction is handled by one individual from beginning to end. The policies clearly indicate which employee (designated by position title) is responsible for each financial transaction duty or oversight procedure.
- **Observation 5:** Procurement policy and procurement actions were performed well and accurately documented. At the highest level, above \$175,000, the combined Empire and Wilson Elevator project was reviewed along with other procurement actions. The combined bid award for this project was \$900,860. In total, this documentation was comprised of approximately 1037 pages and upon review it was readily determined the PHA's procurement manager exercised detailed proficiency in demonstrating the requirements and due diligence afforded to procurement at this threshold.
- **Observation 6:** SCHRA is consistently among the best in Minnesota for its timely and accurate completion and reporting of the form-50058. Submissions for the review period of May, June, July, August and September were 100%. SCHRA's dedication to timely and accurate completion of the form-50058 highlights their dedication to providing safe, affordable, and quality housing in Minnesota.

Concerns

- **Concern 1:** The SCHRA bylaws call for seven board members. The bylaws do allow for temporary or interim vacancies, however, there has been at least once vacancy since September of 2018.
 - **Recommendation:** Provide our office with a response addressing what SCHRA is doing to address the vacancy and when we can expect this position to be filled.
- **Concern 2:** HCV Unit Months Leased (UML) has been sporadic. UML was low in 2019 and then very high in 2020 as the agency went into financial shortfall. SCHRA began 2020 with 1,006 UML out of only 950-unit months available (UMA) in January 2020.
 - **Recommendation:** Provide a response addressing what the agency is doing to stabilize and forecast UMLs year-to-year.

Findings

- **Finding 1:** The SCHRA has not established a written policy or written procedure in the records retention policy or anywhere in the Admissions and Continued Occupancy Policy (ACOP) or Section 8 Administrative Plan (Admin Plan) for destroying criminal records received by the PHA from a law enforcement agency. Although interviews revealed proper and confidential records management, there was no written policy for shredding, hard drive destruction, or destroying sensitive or PII records. There was no reference to turning over sensitive documents to a shred contractor. Although the work is obviously apparent, it must be in a policy.
 - **Regulatory citation:** 24 CFR §5.903(g)(3)
 - **Corrective action:** The PHA must draft a written policy for the ACOP and Admin plan and the policies must be approved by the Board. After the policy is approved, provide a copy of the Board resolution approving the policy in order to enable the HUD FO to close this finding. Alternatively, the SCHRA may provide a certification that this action has been completed with details of what the policies include and when they were approved by Board-resolution.
- **Finding 2:** There is no Individual Relief Request policy for relief from surcharges for excess consumption of PHA-purchased utilities, or from payment of utility supplier billings in excess of allowances for resident-purchased utilities. This policy is missing from the SCHRA ACOP.
 - **Regulatory citation:** 24 CFR §965.508
 - **Corrective action:** The PHA must draft a written policy for the ACOP and have the policy approved by the Board. After the policy is approved, provide a copy of the Board resolution approving the policy to enable our office to close this finding. Alternatively, the SCHRA may provide a certification that this action has been completed with details of what the policy includes and when it was approved by Board-resolution.

Conclusion

We thank you, the St. Cloud HRA staff, and Board for the courtesy and cooperation shown to the HUD review team during our review. As outlined in this report, SCHRA is performing effectively in a number of areas and helping to serve important needs in the St. Cloud area. We also appreciate SCHRA's responsiveness to HUD's recommendations in areas where compliance is lacking, or performance can be improved. In summary, the PHA will need to review two concerns with recommendations for improvement and two findings which will require corrective actions by the PHA. **Within 60 days** of the date of this report, please submit your response to this report. For each finding, please respond with the required corrective actions laid out for you or a plan to implement these actions if more time is needed. For each concern, please respond with either the recommendation made for you or a SCHRA-proposed alternative action, and a plan to implement if more time is needed. Your submitted response should be in one complete package and address all concerns and findings together, even if the response is a plan for implementation. The submission should be properly labeled by concern/finding and if supporting documentation is included, please reference this appropriately. We sincerely hope you find the results of this review as helpful as they are intended.