



BOARD OF COMMISSIONERS
MONTHLY BUSINESS MEETING

OCTOBER 25, 2023

9:00 A.M.

W. ANDREW BOSS BUILDING
555 N. WABASHA ST.

- I. ROLL CALL
- II. OATH OF OFFICE; COMMISSIONER KEVIN LINDSEY; COMMISSIONER LIZ XIONG
- III. MISSION MOMENT
- IV. INTRODUCTION OF NEW STAFF:
- V. APPROVAL OF MEETING MINUTES: SEPTEMBER 27, 2023
- VI. REVIEW OF BILLS AND COMMUNICATIONS: BANK REGISTERS FOR SEPTEMBER 2023
- VII. SEARCH COMMITTEE UPDATE
- VIII. UNFINISHED BUSINESS

IX.A. NEW BUSINESS CONSENT ITEMS

The following items are considered to be routine or non-controversial and will be approved in one motion, without discussion. If a Board member or other meeting attendee wishes to discuss a particular item, that person should inform the Chair and the item will be moved to the Discussion portion of the agenda.

1. RESOLUTION IN RECOGNITION OF DEDICATED SERVICE BY JANICE BEDNAREK
2. FIRE SUPPRESSION SYSTEM INSPECTION, TESTING, AND MAINTENANCE AT PHA PROPERTIES; CONTRACT NO. 24-089
3. 2023 ALLINA HEALTH CHARITABLE CONTRIBUTIONS APPLICATION BY THE PRESIDENTS COUNCIL, CITY-WIDE RESIDENTS COUNCIL AND PHA; RAISED GARDEN BEDS
4. TEMPORARY EASEMENT AT CLEVELAND HI-RISE, CONSTRUCTION OF FINN STREET AT SAINT PAUL HIGHLAND BRIDGE DEVELOPMENT

5. DRAFT PUBLIC HOUSING AGENCY PLAN FOR PHA FISCAL YEAR 2025;
PUBLIC HEARING

IX.B. NEW BUSINESS DISCUSSION ITEMS

1. MANAGEMENT AND OCCUPANCY REVIEW (MOR) FOR THE FISCAL YEAR
ENDING MARCH 31, 2023
2. PROPERTY INSURANCE POLICY RENEWAL
3. INVESTMENT POLICY UPDATE
4. UTILITY ALLOWANCES FOR MULTIFAMILY/PROJECT-BASED RENTAL
ASSISTANCE (PBRA) FAMILY HOUSING PROPERTIES

X. INFORMATIONAL ITEMS

- A. LOUISE SEEBA'S FY23 EVALUATION AND SUMMARY OF LEGAL SERVICES
- B. UPDATE ON DESIGN AND CONSTRUCTION OF NEW UNITS AT
MCDONOUGH HOMES AND DUNEDIN TERRACE; FAIRCLOTH UNITS
- C. CITY COUNCIL RESOLUTION NO. 23-1532; PHA BOARD APPOINTMENT LIZ
XIONG
- D. MINORITY, WOMEN AND DISABLED QUARTERLY BUSINESS REPORT
- E. INVESTMENT REPORT FOR ALL PROGRAMS AS OF OCTOBER 25, 2023
- F. EMERGENCY HOUSING VOUCHERS (EHV); UPDATE ON UTILIZATION AND
FEES
- G. REPORT OF COLLECTION LOSS WRITE-OFFS; SECOND QUARTER OF
FISCAL YEAR 2024



Resolution Number 23-10/25-01

**RESOLUTION IN RECOGNITION OF
DEDICATED SERVICE**

By

JANICE BEDNAREK

Whereas, Janice Bednarek served the Saint Paul Public Housing Agency and its residents for over 39 years, from October 26, 1984, until her retirement on December 12, 2023; and

Whereas, she provided distinguished service in many ways, including the following:

- Jan began her career with the Agency in October 1984 as a Clerk-Typist in the Resident Services Department.
- In January 1990 Jan transferred to the Maintenance Department as a Maintenance Helper where she displayed an aptitude for high performance and a strong work ethic.
- In June 1991 Jan was promoted to Maintenance Mechanic. She served the PHA in that capacity for more than 32 years, preparing vacant units for rental and tending to the PHA's property needs.
- Jan earned the respect, admiration and gratitude of colleagues, peers and supervisors for her tireless efforts, wisdom, and guidance, embodying the values of the PHA.
- Throughout her 39 years with the PHA, Jan demonstrated her commitment to the Agency's mission, residents and community by serving with professionalism and a consistent pursuit of excellence in all aspects of her work, which made her an invaluable member of the Maintenance Department.

In all these ways, Jan contributed to the Agency's exemplary record that includes ongoing High Performer ratings from HUD, adding to the PHA's national reputation for outstanding maintenance and administration of the Public Housing program.

NOW THEREFORE BE IT RESOLVED, that we, the Board of Commissioners of the Public Housing Agency of the City of Saint Paul, on behalf of the Board, the staff, and residents, do recognize and hereby acknowledge with deep appreciation, respect, and admiration for the services provided to the Agency and community by Jan Bednarek and we wish her well in her retirement.

OCTOBER 25, 2023

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL**REPORT TO COMMISSIONERS****FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR****REGARDING** Fire Suppression System Inspection,
Testing, and Maintenance at
PHA Properties; Contract No. 24-089**DATE** October 25, 2023

Staff requests Board approval to award a contract for fire suppression (sprinkler) system inspection, testing, and maintenance at PHA properties to Summit Fire Protection of St. Paul, Minnesota, at the unit prices stated in their proposal for an estimated annual labor cost of \$38,000. The current bid is approximately 8% higher than the previous contract rate due to labor cost increases. If approved, the contract will remain in effect for an initial period of one year, with the option to negotiate annual extensions for a maximum contract term of five years.

Staff advertised the Request for Proposals (RFP) for these services in newspapers, posted a complete set of proposal documents to Northstar Planroom (northstarplanroom.com), and sent invitations to bid to several fire suppression service firms that had expressed an interest in working for the PHA. The two responding firms were independently rated by PHA staff on the criteria stated in the RFP that including general response to the RFP, experience/technical competence, licenses and certifications, references, affirmative action efforts (M/W/DBE) and cost. The evaluation committee ranked Summit Fire Protection as the highest rated proposer, as shown on the attached summary.

PHA hi-rises, community buildings, and 22 recently constructed family housing units at Roosevelt, Mt. Airy and McDonough Homes have fire suppression equipment. This contract includes the following services at those sites:

- Inspecting, testing and maintaining fire suppression (sprinkler) systems for buildings;

- Inspecting, testing and maintaining fire suppression systems for commercial kitchen range hoods;
- Inspecting, testing and maintaining fire pumps;
- Repairing fire suppression system equipment on an as-needed basis, 24 hours a day, 365 days a year;
- Coordinating with other PHA contractors for testing the fire alarm system components and automatic power transfer switches that serve fire suppression systems.

Summit Fire Protection is performing satisfactorily under the current PHA contract for similar work. Copies of the Employer Information Reports for Summit Fire Protection and the second highest rated proposer, LVC Companies, are attached.

There are sufficient funds for this contract in the current PBRA Operating Budgets, and sufficient funds will be requested in PBRA budgets for future years.

JTL/TDB/TDA

Attachments: Summary of Proposal Ratings
Employer Information Reports (EEO-1)

Fire Suppression System Inspection, Testing, and Maintenance at PHA Properties

Contract No. 24-089

Evaluation Scores by Selection Committee

CONTRACTOR	EVALUATORS	GENERAL RESPONSE, TECHNICAL COMPETANCE & RELATED EXPERIENCE	LICENSES & CERTIFICATES	REFERENCES FOR SIMILAR WORK	M/W/DBE	COST	TOTAL POINTS
		(1-35 PTS)	(1-30 PTS)	(1-10 PTS)	(1-5 PTS)	(1-20 PTS)	(1-100 PTS)
Summit Fire Protection	#1	35	30	10	1	18	94
	#2	32	26	10	1	18	87
	#3	35	30	10	1	18	94
	#4	35	29	10	1	18	93
	Averages:	34	29	10	1		92
LVC Companies	#1	28	30	10	1	20	89
	#2	32	28	9	1	20	90
	#3	30	30	9	1	20	90
	#4	30	30	10	1	20	91
	Averages:	30	30	9.5	1		90

**EQUAL EMPLOYMENT OPPORTUNITY
Employer Information Report**

Company Name: Summit Fire Protection Co. Contact Person: Julie Pottratz
 Address: 575 Minnehaha Ave W. Telephone #: 651-288-0792
 City: St. Paul Fax #: 651-237-8020
 State: MN Zip: 55103 Fed. Tax ID #: 41-1927111
 Email Address: Jpottratz@summitfire.com

Company Owner* Information:

- | | |
|--|---|
| <p>Category:</p> <p>1 <input checked="" type="checkbox"/> White Non-Hispanic</p> <p>2 <input type="checkbox"/> Black Non-Hispanic</p> <p>3 <input type="checkbox"/> American Indian</p> <p>4 <input type="checkbox"/> Hispanic</p> <p>5 <input type="checkbox"/> Asian/Pacific Islander</p> <p>7 <input type="checkbox"/> Female</p> <p>8 <input type="checkbox"/> Disabled</p> | <p>Native Origins in:</p> <p>Europe, North America, or the Mid-East</p> <p>Any Black racial group in Africa</p> <p>North America, and maintain cultural identification through tribal affiliation or community recognition, not including Eskimos or Aleuts.</p> <p>Mexico, Puerto Rico, Cuba, Central or South America, or other Spanish origin, culture, or descent, regardless of race.</p> <p>Far East, Southeast Asia, the Indian Subcontinent, Pacific Islands</p> |
|--|---|

* Owner is defined as: one who owns and controls at least 51% of the business, and is involved with the daily operation and management of the business.

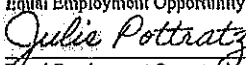
Company Employee Information:

Report the number of all employees - permanent, part-time, apprentices

Occupation Category	White Non-Hispanic		Black Non-Hispanic		American Indian		Hispanic		Asian/Pacific American		Disabled		Totals		
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	All
Officials & Managers	35	4	0	0	0	1	0	0	0	0	0	0	35	5	40
Professionals	21	0	0	7	0	0	0	0	0	0	0	0	21	7	28
Technicians	180	3	5	0	1	0	11	0	1	0	1	0	201	3	204
Sales Workers	18	4	1	0	0	0	0	1	0	0	0	0	19	5	24
Office & Clerical	10	37	0	2	0	0	0	1	0	2	0	0	10	42	52
Craftsmen (Skilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Operatives (Unskilled)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laborers (Unskilled)	29	0	7	0	0	0	0	0	0	0	0	0	36	0	36
Service Workers	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	293	48	13	9	1	1	11	1	1	2	1	0	322	62	384

On-the-Job Trainees* (White collar)															
On-the-Job Trainees* (Production)															

* Report only employees enrolled in formal on-the-job training programs. This information shall also be included in the counts for the appropriate category above.

Julie Pottratz
 Equal Employment Opportunity Officer (Print Name)

 Equal Employment Opportunity Officer (Signature)

**EQUAL EMPLOYMENT OPPORTUNITY
Employer Information Report**

Company Name: LUC Companies Inc. Contact Person: Julie Barden
 Address: 4200 W 76th St Telephone #: 952-835-4600
 City: Minneapolis Fax #: 952-835-4153
 State: MN Zip: 55435 Fed. Tax ID #: 41-1433490
 Email Address: hr@lucinc.com

Company Owner* Information:

Category:

- 1 White Non-Hispanic
- 2 Black Non-Hispanic
- 3 American Indian
- 4 Hispanic
- 5 Asian/Pacific Islander
- 7 Female
- 8 Disabled

Native Origins in:

Europe, North America, or the Mid-East
 Any Black racial group in Africa
 North America, and maintain cultural identification through tribal affiliation or community recognition, not including Eskimos or Aleuts.
 Mexico, Puerto Rico, Cuba, Central or South America, or other Spanish origin, culture, or descent, regardless of race.
 Far East, Southeast Asia, the Indian Subcontinent, Pacific Islands

LUC is an
ESOP

* Owner is defined as: one who owns and controls at least 51% of the business, and is involved with the daily operation and management of the business.

Company Employee Information:

Report the number of all employees - permanent, part-time, apprentices

Occupation Category	White Non-Hispanic		Black Non-Hispanic		American Indian		Hispanic		Asian/Pacific American		Disabled		Totals		
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	All
Officials & Managers	12	3									1		13	3	16
Professionals	18	12		1			1	2					19	15	34
Technicians	2												2	0	2
Sales Workers	26	1											26	1	27
Office & Clerical		19		2				1		3		3	0	28	28
Craftsmen (Skilled)	90	3	2		1		6		4		1		104	3	107
Operatives (Unskilled)	27	3	1		1		2						31	3	34
Laborers (Unskilled)	1												1	0	1
Service Workers													0	0	0
Totals	176	41	3	3	2	0	9	3	4	3	2	3	196	53	249

On-the-Job Trainees* (White collar)															
On-the-Job Trainees* (Production)															

* Report only employees enrolled in formal on-the-job training programs. This information shall also be included in the counts for the appropriate category above.

Darla J Teslow
 Equal Employment Opportunity Officer (Print Name)
Darla J Teslow
 Equal Employment Opportunity Officer (Signature)

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL**REPORT TO COMMISSIONERS****FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR****REGARDING** 2023 Allina Health Charitable
Contributions Application by the
Presidents Council, City-Wide Residents
Council and PHA; Raised Garden Beds**DATE** October 25, 2023

Staff requests Board approval to apply for a \$10,000 grant from Allina Health's 2023 Charitable Contributions program, in partnership with the Presidents Council of PHA Hi-Rises and the City-Wide Residents Council. With staff's assistance, the Residents Council would use these funds to buy more raised garden beds and supplies, to expand gardening opportunities and access to healthy foods for residents, especially elderly or disabled residents. These activities are a popular component of the PHA's Health Improvement Programs.

In September 2023, Allina Health invited the PHA and selected other community partners to apply for these funds, with funding requests accepted through November 27, 2023. Staff will present the proposed list of activities to the Residents Council leadership groups on October 23, 2023; and staff anticipate that both groups will fully support the grant request.

Allina Health has generously supported other activities that support health, wellness and social connection for PHA residents. Since 2012, on behalf of the City-Wide Residents Council and the Presidents Council, the PHA has received \$34,000 in Allina Health Charitable Contributions and \$24,020 in Neighborhood Health Connection grants.

Staff anticipates that Allina Health will announce the grant awards in December 2023.

ANH/BAC

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

REPORT TO COMMISSIONERS

**FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR**

REGARDING Temporary Easement at Cleveland Hi-Rise
Construction of Finn Street
at Saint Paul Highland Bridge Development

DATE October 25, 2023

Staff requests Board approval to execute a temporary easement agreement granting Ryan Companies US, Inc., the use of a strip of land along the west property line at the PHA's Cleveland Hi-Rise, during the construction of the new Finn Street right-of-way as part of the neighboring Highland Bridge development. Staff also recommends accepting Ryan Companies' offer to pay the PHA \$9,170 for use of the property during the term of the temporary easement. The easement would last for two years and begin on the first day Ryan Companies accesses the site. One half of the easement proceeds (\$4,585) will be disbursed to the Cleveland Hi-Rise Resident Council for their use to further enhance resident enjoyment of Cleveland Hi-Rise.

Due to the location of the proposed street and the elevations in the area, the project will need to encroach onto the PHA's property to safely construct Finn Street and the sidewalks. As shown on the attached Exhibit B, the easement would cover the proposed work area and an additional 10 feet beyond the work area, to provide the contractor sufficient space to construct the slope. Construction is expected to start later this year or early 2024, with most of the work happening during the 2024 construction season.

As part of the project some existing trees along the property line will need to be removed, including nine trees on the PHA's property. The construction will not impact any other PHA site features, such sidewalks and benches. To compensate the PHA for the loss of the trees, Ryan Companies agrees to plant and maintain 20 new trees of various species within the easement work area. The easement will

extend until 2025 for tree maintenance, site stabilization, and also in the event that the project needs to be revisited for additional work or corrections. Any damage to PHA property associated with the work will be repaired and/or replaced by Ryan Companies at their expense.

In addition, Ryan Companies agrees to install a sidewalk stub extending from the Finn Street sidewalk to the property line of the Cleveland Hi-Rise site at the north end¹. The PHA plans to construct a new sidewalk in the future, connecting the new stub and the existing Cleveland Hi-Rise sidewalk. That will create a convenient and safe means for PHA residents to access Highland Bridge's parks and other site amenities.

PHA staff and Legal have reviewed the offer, and both agree that based on Ramsey County's existing assessed value of the parcel, Ryan Companies' offer is equal to or greater than the fair-market-value of property for the purpose of the temporary easement. Accordingly, PHA staff are recommending that the Board accept Ryan Companies' proposal and support execution of the agreement.

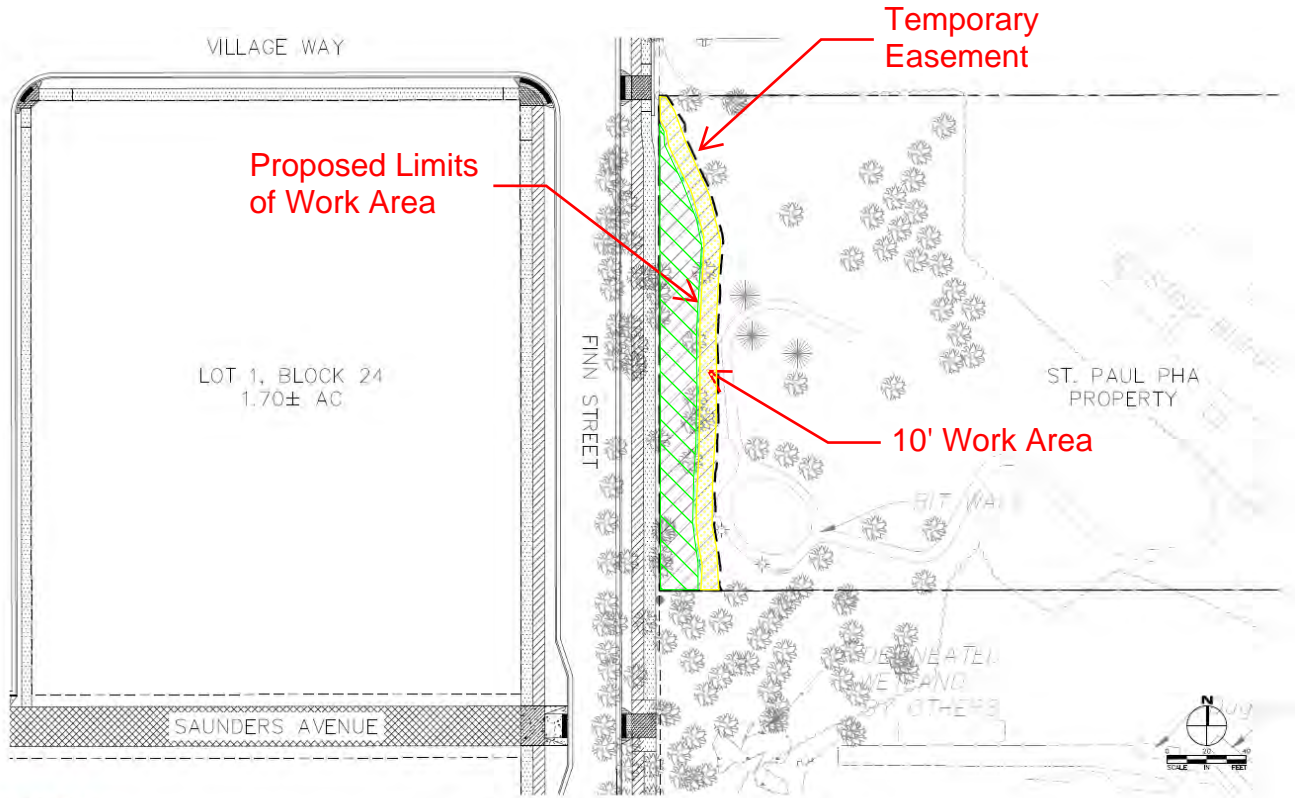
TDA/BNF

Attachments: Exhibit B – Depiction of Easement Area
Exhibit C – Location of Sidewalk Stub

¹ The sidewalk stub was requested by the PHA – refer to Exhibit C for location of proposed stub.

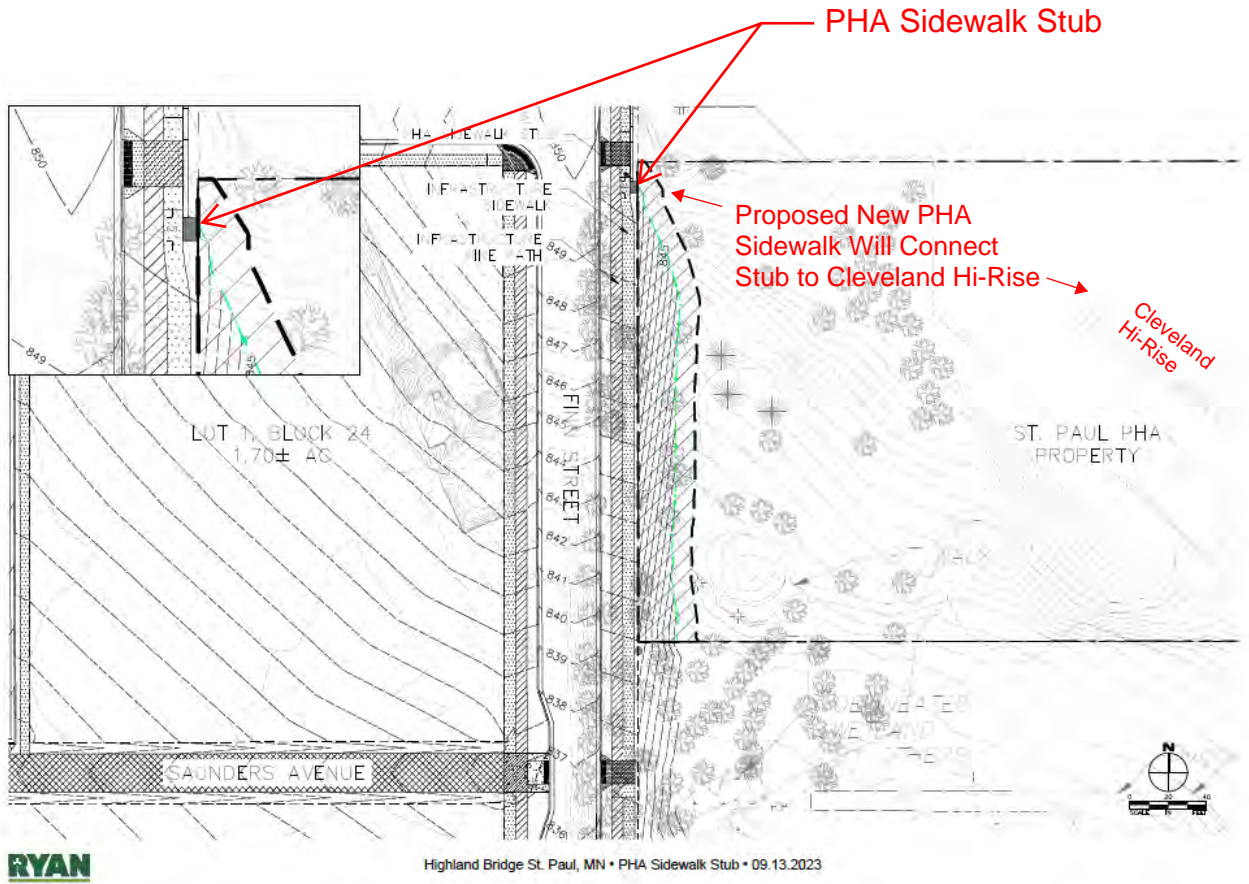
EXHIBIT B

DEPICTION OF EASEMENT AREA



Highland Bridge St. Paul, MN • PHA Easement Extents • 09.13.2023

EXHIBIT C



PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

REPORT TO COMMISSIONERS

**FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR**

REGARDING Draft Public Housing Agency Plan for
PHA Fiscal Year 2025; Public Hearing

DATE October 25, 2023

Staff recommends preliminary Board approval of the attached Annual Agency Plan for the next fiscal year, PHA FY 2025 (Federal Fiscal Year 2024), beginning April 1, 2024. Since Multifamily Housing does not require an Agency Plan, only the Housing Choice Voucher/Section 8 program and the Public Housing scattered sites are covered by this Plan.

On October 3, 2023 the St. Paul Pioneer Press published the required 45-day notice announcing that the PHA will hold a virtual public hearing on the Agency Plan on Tuesday, November 21, 2023 beginning at 4:00 PM. At the hearing staff will summarize the proposed updates to the Annual Agency Plan. Staff will request final Board approval of the Agency Plan at the Board meeting on December 20, 2023, so the Plan can be submitted to HUD in January. The PHA's current approved Agency Plan and the draft plan are posted on the PHA's website, www.stpha.org. The draft Plan for next year is substantially the same as the approved Plan for the current year.

Staff invited public housing residents and Housing Choice Voucher participants to participate in two virtual (Zoom) meetings of the Resident Advisory Board (RAB) in September 2023.

FAH

Attachments: Draft Annual Agency Plan for PHA FY 2025 and Attachments
Notice of Public Hearing on November 21, 2023

Streamlined Annual PHA Plan <i>(High Performer PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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ANNUAL PLAN FOR PHA FY 2025 [FFY 2024], beginning April 1, 2024

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																										
A.1	<p> PHA Name: <u>PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL</u> PHA Code: <u>MN001</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performer PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>418</u> Number of Housing Choice Vouchers (HCVs) <u>5,242*</u> Total Combined <u>5,660</u> *Incl. FUP + MSS/DV + VASH + EHV PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <i>The PHA's AGENCY PLAN is posted on the PHA's official website, www.stpha.org. All of the PHA's Admission & Occupancy Policies for the Public Housing program and Housing Choice Voucher (Section 8) are also posted there. Copies of the Plan are available upon request at the PHA's Central Administrative Office, 555 N. Wabasha Street, St. Paul MN 55102 and at PHA site offices. Questions about the PHA's Agency Plan may be directed to Mai Moua, Executive Assistant/Communications Manager (mal.moua@stpha.org) 651-292-6086.</i> </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																	
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																			
		PH	HCV																								
Lead PHA:																											

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <i>See Attachment G.</i></p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Safety and Crime Prevention.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification <i>See Attachment P: Significant Amendment/Modification of 5-Year CFP Plan</i></p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element below:</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office Review. NOT APPLICABLE: Single project, scattered sites</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Hope VI or Choice Neighborhoods.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <i>See Attachment I.</i></p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Demolition and/or Disposition. <i>(see below)</i></p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant Based Assistance. <i>(See below)</i></p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Project-Based Assistance under RAD. <i>See summary below and details in Attachment J.</i></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Project Based Vouchers. <i>(see below)</i></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <i>(see below)</i></p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). <i>See Attachment L.</i></p> <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p> <p><i>Conversion Completed: Public Housing to Project-Based Assistance under RAD. No further conversion activities were planned or underway when this Plan amendment was written</i></p> <p><i>History: On October 3, 2019 the PHA closed on 8 RAD conversions, removing 3,855 units from public housing and converting 3,836 to Project-Based Rental Assistance (PBRA) under HUD's Multifamily Housing division. (19 units used for non-dwelling purposes were not included in the PBRA HAP Contracts.) The PBRA HAP contracts were effective January 1, 2020.</i></p> <p><i>Together the eight RAD conversion applications constituted a near-portfolio-wide conversion including all of the PHA's the sixteen hi-rises and four family housing developments. The PHA's 418 scattered site homes were not part of these RAD applications; they remain as public housing.</i></p> <p><i>Pending Disposition Activities: No disposition activities were planned or underway when this Plan amendment was written. The PHA continues to manage, maintain and improve the 418 single family homes and duplexes on scattered sites which remain in the Public Housing program.</i></p> <p><i>Project-Based Vouchers (PBV): Staff expects to present recommendations to the Board early in 2024 for awarding Project-Based Vouchers (PBVs) to developers who applied through Minnesota Housing's (Minnesota Housing Finance Agency) 2023 Consolidated Requests for Proposals (RFP). In January 2023 the Board voted to offer up to 150 PBVs in that RFP.</i></p> <p><i>Emergency Housing Vouchers (EHV): The PHA received and fully utilized 157 Emergency Housing Vouchers (EHV), in partnership with the Continuum of Care (Heading Home Ramsey or "HHR") to administer these vouchers. PHAs were required to issue all allocated EHVs by September 30, 2023. No EHV can be issued after that deadline, but assistance will continue to be paid on vouchers already issued.</i></p> <p><i>Units with Approved Vacancies for Modernization: The PHA will continue to hold some scattered site homes vacant upon turnover, to allow significant repair/renovation/modernization work to be completed without relocating residents. (For example, major plumbing and electrical upgrades that require disconnecting the services, replacing kitchen or bathroom flooring and fixtures that render the rooms unusable for days at a time, etc.) Staff plan ahead for this construction work by including significant amounts in annual budgets (Capital Fund Program grants and</i></p>

	Operating Budget), but the work is not started until the home actually becomes vacant. As that occurs, staff asks HUD approval to designate the unit "Vacant Undergoing Modernization".
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.</p> <p><i>The PHA has earned HUD's "High Performer" rating for both public housing (PHMAP and PHAS; 32 years through PHA FY 2022; the PHAS score for FY 2023 is pending) and the Section 8 Housing Choice Voucher Program (22 years; SEMAP). The PHA continues to fulfill its mission:</i></p> <p style="padding-left: 40px;">"The PHA helps families and individuals with low incomes achieve greater stability and self reliance by providing safe, affordable, quality housing, and links to community services."</p>
B.4.	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved.</p> <p><i>See HUD Form 50075.2; HUD approved effective 6/28/2021 and 7/12/2021</i></p>
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p><u>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p><u>Form 50077-ST-HCV-HP, PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</u> must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>

D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>		
D.1	<p>Affirmatively Furthering Fair Housing.</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA may provide further detail on completing this item.</p> <table border="1" data-bbox="175 436 1442 680"> <tr> <td data-bbox="175 436 1442 478"> <p>Fair Housing Goal:</p> </td> </tr> <tr> <td data-bbox="175 478 1442 680"> <p><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> <p><i>Not applicable this year.</i></p> </td> </tr> </table>	<p>Fair Housing Goal:</p>	<p><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> <p><i>Not applicable this year.</i></p>
<p>Fair Housing Goal:</p>			
<p><i><u>Describe fair housing strategies and actions to achieve the goal</u></i></p> <p><i>Not applicable this year.</i></p>			

Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

- A.1** Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.”

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a).)

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR §903.7(b) Describe the PHA’s procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR §903.7(b) A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b) Describe the unit assignment policies for public housing. 24 CFR §903.7(b)

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA’s 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).)

Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see [24 CFR 903.2](#). ([24 CFR §903.23\(b\)](#))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

HOPE VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. ([Notice PIH 2011-47](#))

Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. ([24 CFR §903.7\(h\)](#))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at: <http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. ([24 CFR §903.7\(j\)](#))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. ([24 CFR §983.57\(b\)\(1\)](#)) If using project-based vouchers, provide the projected number of project-based units and general locations and describe how project-basing would be consistent with the PHA Plan.

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. ([24 CFR §903.7 \(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: “See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX.”

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark “yes” and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark “yes,” submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA’s decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State or Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154; or 24 CFR 5.160(a)(3) as applicable (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in

a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

D. Affirmatively Furthering Fair Housing.

D.1 Affirmatively Furthering Fair Housing.

The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' ... PHA Plans (including any plans incorporated therein) ... Strategies and actions must affirmatively further fair housing" Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Public reporting burden for this information collection is estimated to average 7.02 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.



PHA Plan for PHA FY 2025 (FFY 2024) Attachments to Agency Plan

- Attachment A. Membership of the Resident Advisory Board
- Attachment B. Comments on Agency Plan and PHA Responses
- Attachment C. PHA Management Organizational Chart
- Attachment D. Violence Against Women Act (VAWA), Reauthorized 2022
- Attachment E. Pending Disposition Activities: None
- Attachment F. *Capital Fund Program. The PHA will submit the CFP application and annual reports separately with the signed amendment to the Annual Contributions Contract (ACC) after the actual amount of the PHA's CFP grant for the new Federal Fiscal Year is announced.*
- Attachment G. Public Housing and Section 8 Policy Changes
- Attachment H. Housing Needs; Excerpts from the City of Saint Paul, Minnesota Consolidated Plan and Submission 2020-2024 (PDF)
- Attachment I. Development/Conversion Concept: Expand Public Housing Inventory Available for Eligible Families or Individuals
- Attachment J. Conversion of Public Housing to Project-Based Assistance under RAD
- Attachment K. Implementing HUD's Smoke-Free Mandate
- Attachment L. Use of Operating Funds for Capital Activities
- Attachment M. Deleted
- Attachment N. Definition of a Significant Amendment to the Agency Plan
- Attachment O. Emergency Housing Vouchers (EHV)
- Attachment P. Definition of a Significant Amendment to the 5-Year CFP Plan

MEMBERSHIP OF THE RESIDENT ADVISORY BOARD

- Section 8/Housing Choice Voucher representatives who volunteered for the RAB in response to mass mailings.
- Residents of public housing (that is, the scattered site single family homes and duplexes) who volunteered for the RAB in response to mailings.

PHA staff will continue to send information about the RAB to the two PHA Commissioners who are residents of PHA-owned housing. As of October 1, 2023 Leonard Thomas represents hi-rise residents and Veronica Robinette represents family housing residents.

The Resident Advisory Board membership fluctuates due to residents moving out of public housing or leaving the HCV/Section 8 program, etc.

RAB mailings have also been sent to Southern Minnesota Regional Legal Services, Inc. (SMRLS).

Before the PHA converted most of its public housing (16 hi-rises and four family housing developments) to Multifamily Housing (Project-Based Rental Assistance, PBRA) the RAB also included representatives from those properties.

Because of the COVID-19 pandemic, the 2023 RAB meetings and the public hearing were “virtual”, held on “Zoom” conference calls (the same as meetings of the Presidents Council and City-Wide Resident Council).

SUMMARY OF COMMENTS ON AGENCY PLAN AND PHA RESPONSES

RAB Comments

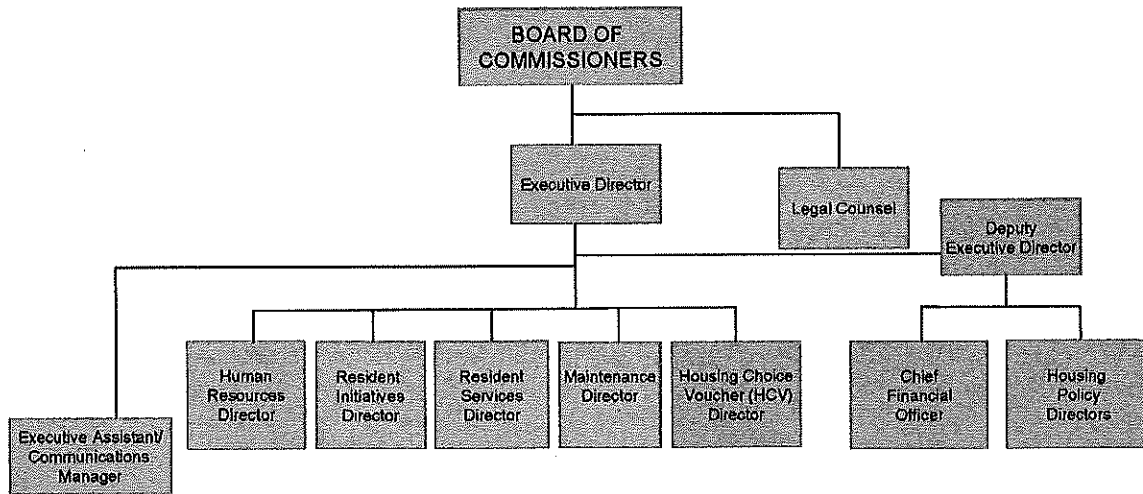
Because of the COVID-19 pandemic, the RAB meetings were “virtual” this year, held on “Zoom” conference calls (the same as meetings of the Presidents Council and City-Wide Resident Council). The PHA convened two meetings of the Resident Advisory Board (RAB) in September 2023 to discuss the Agency Plan requirements and drafts and other policy issues. The RAB did not submit any written comments on the Agency Plan.

Comments from the Public Hearing

The Agency Plan Public Hearing will be held on November 21, 2023.

Because of the COVID-19 pandemic, the public hearing will be “virtual” again this year, held on a “Zoom” conference call with telephone access. No written comments on the Plan had been submitted when this draft of the Agency Plan was written.

**PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL
ORGANIZATIONAL CHART
Board Approved February 22, 2023**



Violence Against Women Act (VAWA); 2013 Reauthorization

On April 25, 2007 the PHA Board of Commissioners approved a Policy on Protections for Victims of Domestic Violence (“VAWA Policy”) and related amendments to the PHA’s Admission and Occupancy Policies for the Public Housing Program and the Section 8 Housing Choice Voucher Program. The policies are posted on the PHA’s Internet website, www.stpha.org. On May 24 and September 27, 2017 the PHA Board approved revisions to the policy to conform to the 2013 Reauthorization.

The PHA adopted these policies in compliance with the Violence Against Women Act (VAWA) as amended. The Act also requires the PHA to describe in the Agency Plan any goals, objectives, policies or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault or stalking. (Sec. 603).

- The PHA supports the goals of the VAWA and will comply with its requirements.
- The PHA will continue to administer its housing programs in ways that support and protect residents (including residents of public housing and Multifamily Housing/PBRA, and Section 8 Housing Choice Voucher program participants) and applicants who may be victims of domestic violence, dating violence, sexual assault or stalking.
- The PHA will not take any adverse action against a resident/participant or applicant solely on the basis of her or his being a victim of such criminal activity, including threats of such activity. “Adverse action” in this context includes denial or termination of housing assistance.
- The PHA will not subject a victim of domestic violence, dating violence, sexual assault or stalking to a more demanding standard for lease compliance than other residents.
- The PHA will continue to develop policies and procedures as needed to implement the requirements of VAWA, and to collaborate with other agencies to prevent and respond to domestic violence, dating violence, sexual assault or stalking, as those criminal activities may affect applicants for and participants in the PHA’s housing programs. The PHA cooperates with St. Paul area public and non-profit agencies that provide activities, services and programs to assist and support victims of domestic violence. (See attached list of agencies or go to the website for Minnesota Coalition for Battered Women - <http://www.mcbw.org>)
- The PHA’s VAWA Policy states that “The PHA will provide notices explaining the VAWA protections to applicants for housing assistance (both Section 8 Housing Choice Vouchers and Public Housing), to public housing residents and Section 8 voucher participants, and to property owners participating in the voucher program.”
- The PHA has provided VAWA training to its staff, and to other housing agencies through the Minnesota Chapter of NAHRO.

ATTACHMENT E to Saint Paul PHA Agency Plan for PHA FY 2025 (FFY 2024)

○

○ Name	Business Phone	Crisis Line	Area Served
<u>St. Paul Intervention Project</u>	651-645-2824	651-645-2824	Ramsey County
<u>Jewish Domestic Abuse Collaborative - Jewish Family Services of Mpls</u>	952-546-0616		Hennepin, Ramsey Counties
<u>Breaking Free</u>	651-645-6557	651-645-6557	Ramsey County
<u>Esperanza United</u>	651-646-5553	651-772-1611	Hennepin, Ramsey Counties
<u>Think Self Deaf Domestic Violence Program</u>	651-829-9089	651-399-9995 (text/SMS)	Hennepin, Ramsey Counties
<u>National Clearing House on Abuse in Later Life</u>	608-255-0539		Statewide
<u>Praxis International</u>	651-699-8000		St. Paul/National
<u>Southern Minnesota Regional Legal Services</u>	651-228-9823	651-222-4731	St. Paul/Southern Minnesota
<u>Women of Nations</u>	651-251-1609	877-209-1266	Hennepin, Ramsey Counties
<u>Women's Advocates</u>	651-227-9966	651-227-8284	Statewide
<u>Bridges to Safety</u>	651-645-2824	651-266-9901	Ramsey County

Violence Free Minnesota <https://www.vfmn.org/contact>
 60 East Plato Blvd., Suite 230, St. Paul, MN 55107
 Voice: (651) 646-6177 or (800) 289-6177
 Fax: (651) 646-1527

Public Housing residents and Section 8/Housing Choice Voucher Participants who fear for their safety and need assistance keeping their home address confidential from their abusers may contact the **Safe at Home** program administered by the Office of the Minnesota Secretary of State. More information about the Safe at Home program can be found at <http://www.sos.state.mn.us/safe-at-home/about-safe-at-home/>

Pending Disposition Activities

No disposition activities were underway or contemplated when this Plan was written

On October 3, 2019 the PHA closed on all 8 RAD conversions, converting 3,855 public housing units to Project-Based Rental Assistance (PBRA) under HUD's Multifamily Housing division. The PBRA HAP contracts were effective January 1, 2020. The PHA continues to manage, maintain and improve the 418 single family homes and duplexes on scattered sites which remain in the Public Housing program.

Declaration of Trust (not a disposition). HUD's Special Applications Center (SAC) approved the PHA's request to release HUD's Declaration of Trust (DOT) for the W. Andrew Boss Building (located at 555 North Wabasha Street in St. Paul) which has been on file in the Ramsey County Property records. This is not a property disposition; a "Use Restriction" commits the PHA to continue using the property for its current purposes for not less than 30 years.

Capital Fund Program

The Capital Fund budgets and reports are not attached to the Agency Plan.

The PHA submits the required Capital Fund Program (CFP) budgets and reports along with the signed amendment to the Annual Contributions Contract (ACC).

POLICY CHANGES IN PUBLIC HOUSING AND SECTION 8

The following PHA policies were revised after the last Agency Plan was submitted. (Section B.1. of the Annual Plan). The PHA also adopted policy waivers authorized by the CARES Act, as shown on Attachment P.

The complete Admission & Occupancy Policies (AOP) are posted on the PHA's Internet website, www.stpaulpha.org.

- On April 26, 2003, the Board of Commissioners approved revisions to the Admission and Occupancy Policies for the Public Housing Program, as follows:
 - Revising the policy regarding “over-income” households to comply with federal law changes and recent instructions from HUD, including
 - Increasing the annual income limit defined as “over-income”, to 120% of the Twin Cities Area Median Income (AMI) ;
 - Extending the time during which an over-income household may remain in public housing; and
 - Revising related policies to conform to HUD requirements; and
 - Updating the procedure for offering vacant scattered site homes to an eligible applicant, to allow two consecutive unit offers; and
 - Making other “housekeeping” updates and edits in the public housing policies, including removing references to the sixteen PHA-owned hi-rises and four family housing developments, which are no longer part of the Public Housing program. (They are now RAD-PBRA, in HUD’s Multifamily Housing program.)

HOUSING NEEDS

The City of Saint Paul's Draft Consolidated Plan for 2020 – 2024 describes the housing needs in the community, at pages 38 - 53.

The 2020-2024 Consolidated Plan outlines federal funding priorities for housing, economic development, infrastructure, and public service needs. The 2020-2021 Annual Action Plan summarizes the actions, activities, and resources used to address these priority needs. Both plans are required by the U.S. Department of Housing and Urban Development (HUD).

<https://www.stpaul.gov/departments/planning-economic-development/consolidated-plan>

Development/Conversion Concept: Expand Public Housing Inventory Available for Eligible Families or Individuals

In recent years the PHA has been pursuing opportunities to develop new affordable housing, using existing PHA resources to leverage other funds. The PHA received long-term forgivable loans from the Minnesota Housing (Finance) Agency to construct some new units and accelerate capital improvements on existing public housing properties.

In 2023 the PHA received commitments of funding for eleven new family housing units ("Faircloth Units") from Ramsey County, who awarded a total of \$2,600,000 to the PHA for the development of seven family housing units at McDonough Homes and \$1,350,000 for the development of four family housing units at Dunedin Terrace. The units are being constructed under the Low Income Public Housing (LIPH) program. They will either remain as LIPH or be converted to PBRA using HUD's "Faircloth to RAD" program, depending on which model provides greater financial stability for the projects.

The PHA will continue to seek out opportunities to produce affordable housing for veterans and other eligible households by leveraging existing resources in Public Housing, Section 8 or Multifamily housing.

Conversion of Public Housing to Project-Based Assistance Under RAD (Rental Assistance Demonstration)

On October 3, 2019 the PHA closed on 8 RAD conversions, removing 3,855 units from public housing and converting 3,836 units to Project-Based Rental Assistance (PBRA) under HUD's Multifamily Housing division. (19 units used for non-dwelling purposes were not included in the PBRA HAP Contracts.)

Together the eight RAD conversion applications constituted a near-portfolio-wide conversion including all of the PHA's the sixteen hi-rises and four family housing developments. The PHA's 418 scattered site homes were not part of these RAD applications; they will remain as public housing. The PHA continues to manage, maintain and improve the 418 single family homes and duplexes on scattered sites which remain in the Public Housing program.

Implementing HUD's Smoke-Free Mandate in Public Housing

The PHA has implemented HUD's Smoke-Free Mandate in Public Housing, following the Final Rule "Instituting Smoke-Free Public Housing" published December 5, 2016 and HUD Notice PIH 2017-03.

On April 25, 2018 the PHA Board approved the following policy for public housing, as Appendix H to the Admission and Occupancy Policies for Public Housing:

In the interests of providing a healthful living and working environment for PHA residents, staff and others, and to comply with HUD's "Smoke-Free Public Housing Rule" (24 CFR Sec. 965.653) smoking is prohibited in all public housing living units and interior areas (including but not limited to balconies, hallways, rental and administrative offices, community centers, day care centers, laundry centers, and similar structures), as well as in outdoor areas within 25 feet from public housing and adjacent outdoor common spaces (like patios), and administrative office buildings.

The policy applies to the use of all "prohibited tobacco products" which are defined as

Items that involve the ignition and burning of tobacco leaves, such as (but not limited to) cigarettes, cigars, and pipes; as well as waterpipes (hookahs).

This policy does not include "Electronic Nicotine Delivery Systems" (ENDS) such as "e-cigarettes".

This policy shall be incorporated in the lease for all residents.

This policy was effective July 30, 2018.

Use of Operating Fund for Capital Activities

The PHA does not anticipate using funds from the Annual Operating Budget for capital activities in public housing during the Plan year. The only units remaining in public housing are the 418 scattered site single family homes and duplexes; and we expect the Capital Fund Program (CFP) grants for that project will be sufficient to pay for planned capital improvements.

[ATTACHMENT M – DELETED]

DEFINITION OF A SIGNIFICANT AMENDMENT TO THE AGENCY PLAN

The PHA's current definition of a significant amendment is as follows:

*Substantial deviations or significant amendments or modifications are defined as discretionary changes in the plans or policies of the PHA that fundamentally change the mission, goals, objectives, or plans of the Agency and which require formal approval of the Board of Commissioners.
(approved by the PHA Board of Commissioners on December 15, 1999)*

The PHA believes this definition does not need to be revised at this time.

The PHA has adopted a separate "significant amendment" statement that applies specifically to the 5-Year Action Plan for the Capital Fund Program. See Attachment P.

Emergency Housing Vouchers (EHV)

The PHA received and fully utilized 157 Emergency Housing Vouchers (EHV), in partnership with the Continuum of Care (Heading Home Ramsey or "HHR") to administer these vouchers. PHAs were required to issue all allocated EHV's by September 30, 2023. No EHV can be issued after that deadline, but assistance will continue to be paid on vouchers already issued.

Definition of a Significant Amendment to the 5-Year CFP Plan

Substantial deviations or modifications to the CFP 5-Year Action Plan are defined as changes in the plan that require formal approval by the Board of Commissioners. Additions of a Capital Fund project or non-emergency work items that are not in the current CFP Annual Statement or 5-year Action Plan in an amount equal to or greater than \$250,000 would be considered significant amendments, as well as material changes in regard to demolition, disposition, homeownership, RAD or other conversion, Capital Fund financing, development or mixed finance conversion activities.



October 2, 2023

NOTICE OF PUBLIC HEARING

PHA AGENCY PLAN

Fiscal Year 2025 Draft Available for Review

The Saint Paul Public Housing Agency (PHA) has drafted an Annual Agency Plan for its Fiscal Year 2024 beginning 4/1/2024, in consultation with a Resident Advisory Board. To protect PHA residents, staff and the public during the continuing pandemic, this year's public hearing on the Agency Plan will be held virtually on:

TUESDAY, NOVEMBER 21st, 4:00 – 5:30 p.m.

For more information about how the virtual public hearing will be conducted, please go to the PHA's internet website, <https://www.stpha.org/public-notice>.

The Agency Plan summarizes policies and plans for both Public Housing and the Housing Choice Voucher rent assistance program (Section 8). The current Agency Plan's contents and the draft plan will be available for review on the internet at www.stpaulpha.org.

Written comments on the draft PHA Agency Plan may be submitted any time before December 1, 2023 by email to Ka.Thao@stpha.org or by U.S. Mail to:

Saint Paul Public Housing Agency
555 N. Wabasha Street, Suite 400
Saint Paul, Minnesota 55102-1017

For more information or to receive a copy of the PHA Agency Plan summary by mail or email, please contact Ka Thao, 651-292-6055 or Ka.Thao@stpha.org.



PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

REPORT TO COMMISSIONERS

FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR

REGARDING Management and Occupancy Review (MOR)
for the Fiscal Year Ending March 31, 2023

DATE October 25, 2023

Staff recommends that the Board receive and file the attached reports from HUD's Management and Occupancy Review (MOR) for all eight RAD Project-Based Rental Assistance (RAD-PBRA) properties, which began in February 2023. HUD sent the attached summary letter to the Executive Director on September 29, 2023, stating that "The overall rating of the property is 'Superior'". To be clear, HUD rated all eight RAD-PBRA properties as Superior, as detailed in the attached checklists for each property. This is the highest possible score for MORs.

HUD conducts MORs of all properties in the Multifamily Housing programs to ensure that property owners/managers comply with the Department's rules and regulations. This MOR was conducted by approximately 15 HUD staff from the Minneapolis Field Office of Multifamily Housing. The two-part review began with an on-site file review on February 13, 2023 and concluded on March 2, 2023 with a physical site inspection of randomly selected RAD units.

In addition to confirming that PHA staff successfully navigated the huge transition from Public Housing to Project-Based Rental Assistance/Multifamily Housing, this MOR score means the PHA's next review will be conducted in three years, the longest possible interval between reviews.

To prepare for PHA's first MOR, staff contracted with Du & Associates to conduct a "pre-MOR" review that began in February 2022 and was completed in August 2022. Upon completion of the pre-MOR, Du & Associates submitted review findings and provided training to staff. This allowed staff to create an action plan to address most findings ahead of the official

HUD MOR. Some findings flagged by Du & Associates could not be remedied, for example findings related to point-in-time reports that were missing from tenant files; and those same findings were noted in the HUD MOR.

HUD did note one item as critical in their report: the Equal Housing Opportunity logo needs to be displayed at the front entrance of all RAD properties. Staff are working to address this finding promptly and will provide the required responses to all of the MOR findings by the October 29, 2023 deadline.

Staff will continue to manage and maintain the RAD-PBRA properties in accordance with HUD requirements and other federal, state and local laws and regulations, as well as sound practices for managing affordable housing.

KNG/LAF/JMG

Attachments: MOR Summary Letter dated September 29, 2023

2023 MOR Findings Summary Report

MOR Checklists for Each RAD-PBRA Project:

- Project 1 McDonough Homes
- Project 2 Hamline, Front and Seal Hi-Rises
- Project 3 Edgerton, Iowa and Wilson Hi-Rises
- Project 4 Roosevelt Homes
- Project 5 Mt. Airy Homes & Hi-Rise, Valley Hi-Rise
- Project 6 Exchange and Wabasha Hi-Rises
- Project 7 Ravoux, Central and Neill Hi-Rises
- Project 8 Dunedin Terrace & Hi-Rise, Montreal and Cleveland Hi-Rises



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Multifamily Midwest Region
Minneapolis Satellite Office
Paul D. Wellstone Federal Building
212 3rd Avenue South, Suite 150
Minneapolis, MN 55401-2657

September 29, 2023

Jon Gutzmann, Executive Director
Public Housing Agency of the City of St. Paul
555 Wabasha Street North, Suite 400
St. Paul, MN 55102-1602
Jon.Gutzmann@stpha.org – sent by email only

Dear Mr. Gutzmann:

SUBJECT: HUD ID 800247993 – MN46RD00002 – McDonough Homes
HUD ID 800248727 – MN46RD00003 – Hamline, Front, Seal
HUD ID 800248728 – MN46RD00004 – Edgerton, Iowa, Wilson
HUD ID 800248729 – MN46RD00005 – Roosevelt Homes
HUD ID 800248729 – MN46RD00006 – Mt. Airy and Valley
HUD ID 800248730 – MN46RD00007 – Exchange/Wabasha
HUD ID 800248731 – MN46RD00008 – Ravoux, Central, Neil
HUD ID 800248733 – MN46RD00009 – Dunedin, Montreal, Cleveland

The U.S. Department of Housing and Urban Development (HUD) would like to thank you for your cooperation and assistance during the Management and Occupancy Review (MOR) for the above referenced contracts. Enclosed are the Management and Operating Review Rating Summary and the Summary Reports – Finding, noting the results of the MOR. The overall rating of the property is “Superior”.

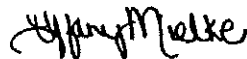
During the review it was clear that you and your staff adequately prepared for the conversion from Public Housing to Multifamily by receiving the necessary training and making required changes to operations. This was a daunting task, given the number of units that were converted at one time. Your staff was very accommodating during the file review portion of the review; providing explanations and required documentation when asked. We hope the information exchanged during the review was as beneficial to you as it is to HUD. While conducting our site inspections, it was obvious that your staff is well connected to each community and your residents. There were some observations and findings uncovered during the reviews of the Occupancy files and we fully anticipate that you will embrace these as learning opportunities and make any necessary adjustments.

One critical Fair Housing component that needs to be addressed is that the Equal Housing Opportunity sign or logo needs to be at the front entrance of all your properties. This may not have been a requirement under Public Housing, but it is required under Multifamily. For your family sites, if you are not able to affix the logo to the existing signs, perhaps you could have a metal post added that contains the logo. Each of the building entrances and/or signs should have the logo displayed.

A written response must be submitted to mn.incoming@hud.gov with a copy to Julie.A.LaSota@hud.gov within 30-days of receipt, unless an extension is requested and granted by HUD. You must provide a written response for each of the findings noted, indicating the corrective action taken to cure each deficiency, or the reason why the items remain uncorrected.

If you have any questions, please contact Julie LaSota, Resolution Specialist, by email at Julie.A.LaSota@hud.gov. Please note that this correspondence will be sent by email only. No hard copy will follow.

Sincerely,



Tiffany Mielke, Chief Asset Resolution Branch
Minneapolis Asset Management Division

Enclosures

cc: tara.johnson@stpha.org
ana.matos@stpha.org
lisa.feidler@stpha.org

SUMMARY REPORT – FINDINGS

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- o The condition describes the problem or deficiency
- o The criteria cites the statutory, regulatory, or administrative requirements that were not met
- o The cause explains why the condition occurred
- o The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
<p><u>Addendum A. A.1</u></p> <p>This includes all files in place at the time of the RAD conversion on 1/1/2020.</p>	<p>Condition: Original Applications not found in any of the pre-RAD Occupancy files. The application for tenancy or assistance (Application) does not contain date and time of receipt. There was not an application in the Occupancy files for all households in place at the time of the RAD conversion.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 4-16 A1: Upon receipt of an application for tenancy or assistance (Application), the owner must indicate on the application the date and time received.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to indicate date and time of receipt on the Application may result in tenants being selected in improper order from the waiting list.</p> <p>Corrective Action: Pre-RAD: Document applicable files with an explanation for the absence of the Application. In response, provide a copy of the explanation and assurances that all future Applications will be date and time stamped.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A. A.3</u></p> <p>This includes all files in place at the time of the RAD conversion on 1/1/2020.</p>	<p>Condition: EIV Existing Tenant Search results not found in any of the pre-RAD Occupancy files. O/A failed to use the EIV Existing Tenant Search report at the time of application processing.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 9-12: O/A must use the Existing Tenant Search report at the time they are processing an application to determine if the applicant(s) are currently being assisted at another Multifamily Housing or PIH location.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to use the EIV Existing Tenant Search report at the time of application processing may result in dual subsidy.</p> <p>Corrective Action: It appears that this issue is isolated to just the pre-RAD universe of Occupancy files. A note should be placed in each pre-RAD Occupancy file indicating that the application is not available, as this household was in place at the time of the RAD conversion. In response to this finding, provide assurance that this will be done and that the report will be used during applicant processing in the future.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – A.8</u></p> <p>MN46RD00005 (no info on foster children) (HoH only, not signed)</p> <p>MN46RD00007 (in file but filled incorrectly)</p>	<p>Condition: Form HUD-27601 missing or filed in incorrectly. Completing this form is optional and there is no penalty for not completing it. When the applicant chooses not to self-certify race or ethnicity, a notation as such may be placed in the file.</p> <p>Criteria: The applicant provides self-certification of their race and ethnicity for data collection by using form HUD-27061-H. HUD HH 4350.3 R1 C4 Par.4-14 A4 and Exhibit 4-3. Completing this form is optional and there is no penalty for not completing it. When the applicant chooses not to self-certify race or ethnicity, a notation as such may be placed in the file.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to use the HUD-27061-H form to collect Race and Ethnic data may result in incorrect information being collected and reported to HUD.</p> <p>Corrective Action: Offer the tenant the opportunity to complete the HUD-27061-H Race and Ethnic Data Reporting form and place it in the tenant file. In response, provide a copy of the completed, signed form.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – A9</u></p> <p>MN46RD00008 file signed 2.8.2022 but EIV pulled 12.1.2021. - Signed over 120 days prior to AR</p>	<p>Condition: HUD-9887, Notice and Consent to the Release of Information and HUD-9887-A, Applicant/Tenant Consent to the Release of Information was missing or incomplete from the file.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 5-15B: All adult members of the household must authorize O/A to request independent verification of data required for program participation, by signing the HUD-9887 and HUD-9887-A consent form.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to provide and obtain signatures on the HUD-Form 9887 and HUD-9887-A may result in the O/A not having proper consent to the release of tenant information.</p>	<p>30 days from the date of this letter</p>

	<p>Corrective Action: Have all adult members of the household sign the HUD-9887 and HUD-9887-A and place it in the tenant file. In response, provide a copy of the completed, signed form.</p>	
<p><u>Addendum A – A.10</u></p> <p>This appears to be all of the files. Going forward, all files must have LPB Certifications at MI and all subsequent AR.</p>	<p>Condition: There was no acknowledgement in the file that the tenant received the Lead Based Paint Certification.</p> <p>Criteria: HH 4350.3 R1 C4 P4-24B: O/A must provide the Lead Based Paint certification to all applicants and current tenants, at move-in and annually at recertification.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to provide the tenant with the Lead Based Paint certification may result in the tenants not being aware of potential hazards and remedies and responsibilities.</p> <p>Corrective Action: Owner must certify that procedures will be put in place to ensure that LPB certifications are provided at each annual recertification for all households and that acknowledgements are kept on file.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – B1</u></p> <p>MN46RD00004 [REDACTED] – email indicating wallet was stolen and applied for new card 10.22. Must follow up.</p> <p>MN46RD00005 [REDACTED] – Drivers License check.</p>	<p>Condition: There is no verification of SSN in the file</p> <p>Criteria: HH 4350.3 R1 C4 Par. 3-9: Applicants and tenants must disclose and provide verification of the complete and accurate SSN assigned to them.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to obtain verification of SSN assigned to each household member may result in rental subsidy being paid on behalf of an ineligible tenant.</p> <p>Corrective Action: Obtain acceptable form of verification of SSN. In response, provide a copy of the supporting documentation.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – B.2.</u></p> <p>This includes all files in place at the time of the RAD conversion on 1/1/2020.</p> <p>MN46RD00002 [REDACTED] Missing last digit on permanent resident alien cards for all HH members.</p>	<p>Condition: Missing or incomplete information for immigration status. It is noted that for all households in place at the time of the RAD conversion, this had not been a requirement under Public Housing, and therefore would not be available.</p> <p>Criteria: HH 4350.3 R1 C4 P3-12E: As part of the annual or interim recertification process, owners must determine the citizenship/immigration status of tenants from whom the owner has not previously collected the proper documentation or whose documentation suggested that their status was likely to change. <u>It is noted that for all households in place at the time of the RAD conversion, this had not been a requirement under Public Housing, and therefore would not be available.</u></p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to complete the required screening prior to move-in may result in housing individuals that would otherwise be ineligible. Tenant may no longer be an eligible non-citizen causing the subsidy amount paid on behalf of the household to be incorrect.</p> <p>Corrective Action: Place a note in each pre-RAD file and document the file with the missing information for the post-RAD file. In response to this finding, provide assurance this will be done.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – B.3 and 4.</u></p> <p>This includes all files in place at the time of the RAD conversion on 1/1/2020.</p>	<p>Condition: Missing or incomplete information for pre-RAD files. There was no evidence in the file that criminal, drug, and sex offender registration screening had been performed on all adult household members prior to move-in.</p> <p>Criteria: HUD Handbook 4350.3, Rev. 1, Chg 4, Chapter 4-3 D. HUD Handbook 4350.3, Rev. 1, Chg 4, Chapter 4-14, B.2.</p> <p>Cause: Owner/Agent error.</p> <p>Effect: Failure to conduct screening activities on applicants may result in rental subsidy being paid on behalf of an ineligible applicant.</p> <p>Corrective Action: Pre-RAD files: Document the tenant file with an explanation for the absence of applicant screening activities.</p> <p>Perform sex offender screening on all adult household members, as well as checking the sex offender registrations, as required. Provide copies of supporting documents and assurance screening activities will be performed on all future applicants.</p> <p>In response to this finding, provide assurance this has been done.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A. C-1</u></p> <p>This includes all files in place at the time of the RAD conversion on 1/1/2020.</p>	<p>Condition: All Move In and annual unit inspections were not found in the file.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 6-29 C1: Before executing a lease, the owner and tenant must jointly inspect the unit. HH 4350.3 R1 C4 Par. 6-29 A3: Owners perform unit inspections on at least an annual basis to determine whether the appliances and equipment in the unit are functioning properly and to</p>	<p>30 days from the date of this letter</p>

	<p>assess whether a component needs to be repaired or replaced. This is also an opportunity to determine any damage to the unit caused by the tenant's abuse or negligence and, if so, make the necessary repairs and bill the tenant for the cost of the repairs.</p> <p>Cause: Owner/Agent Error</p> <p>Effect: Unable to assess if the unit was in decent, safe, and sanitary condition at the time of move-in. There is no record for the agent to assess the condition of the unit and if any maintenance is required after an annual inspection.</p> <p>Corrective Action: If Move In inspection reports are available from pre-RAD properties, they should be transferred to the Occupancy file and going forward, procedures should be put in place to include Move In, Annual and Move Out Inspection Reports in each file. Provide a certification that procedures will be updated to include Move In and all annual inspections going forward.</p>	
<p><u>Addendum A – D.3</u></p> <p>MN46RD00004 ██████████</p>	<p>Condition: Recertification Activities: One file contained certification documents where resident dated all documents with incorrect year. Was not caught by Agent and corrected.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 4: O/A must ensure all documents are completely correctly, and signed and dated by residents, at move-in and annually at recertification.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Incorrect information in files and 50059s.</p> <p>Corrective Action: Require tenant to correct the date on all relevant documents. For your response, provide HUD with copies.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – D.8 Income</u></p> <p>MN46RD00002 ██████████ - income calc does not appear correct</p> <p>MN46RD00008 ██████████ - Letter for pension older than 120 days. Dated 3.11.21 stamped 6.21.22. No date on self cert. No explanation as to why needed self cert and not getting 3rd party verifications.</p> <p>██████████ - No information in tenant file stating hrs worked or how they derived \$13101 as income mwhen current 6 paystubs = \$3023.38. Should divide by 6 = \$503.90?? Not enough information.</p>	<p>Condition: O/A may not have properly calculated income.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 5-6: All income must be properly calculated.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to properly calculate income may result in the incorrect amount of rental subsidy being paid on behalf of the tenant.</p> <p>Corrective Action: Recalculate income. If necessary, submit a corrected 50059 via TRACS marked as correction. In response, provide a copy of the signed, corrected 50059 and supporting documentation.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – D.9 Income from Assets</u></p> <p>MN46RD00002: ██████████ - 6 month avg used for savings instead of actual.</p> <p>MN46RD00008 ██████████ - Agent not consistent when taking monthly balance. HUD comes up with different amount.</p> <p>██████████ - Indicates tenant has checking account, but no \$ on cert.</p> <p>██████████ - Did not verify int/dividend income from Fidelity and did not use ending balance.</p>	<p>Condition: O/A did not properly calculate income from assets.</p> <p>Criteria: HH 4350.3 R1 C4 Par. 5-7: All income from assets must be properly calculated.</p> <p>Cause: Owner/Agent Error</p> <p>Effect: Failure to properly calculate income from assets may result in the incorrect amount of rental subsidy being paid on behalf of the tenant.</p> <p>Corrective Action: Recalculate asset income. If necessary, submit a corrected 50059 via TRACS marked as correction. In response, provide a copy of the signed, corrected 50059 and supporting documentation.</p>	<p>30 days from the date of this letter</p>

<p><u>Addendum A – D.11</u> <u>Allowance/Expenses/Deductions</u></p> <p>MN46RD00008 [REDACTED] - Nothing in file as to receipts or verifications. No documentation in file notifying tenant of discrepancy.</p> <p>MN46RD00008 [REDACTED] - It appears resident is not eligible for medical expense deduction. Resident turned 62 in Aug 2022. All medical expenses pre-date resident turning 62 and appear to be ineligible. D15: Deductions on 50059 include \$328 medical deduction which is ineligible. Income should be \$13,295. TTP should be \$332 vs. \$324 on 59. Assistance should be \$445 vs. \$453.</p>	<p>Condition: O/A did not properly calculate deductions.</p> <p>Criteria: HH 4350.3 R1 C4 P5-10: All deductions must be properly calculated.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to properly calculate deductions may result in the incorrect amount of rental subsidy being paid on behalf of the tenant.</p> <p>Corrective Action: Recalculate deductions. If necessary, submit a corrected 50059 via TRACS marked as correction. In response, provide a copy of the signed, corrected 50059 and supporting documentation.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – D.13</u> <u>Disposal of Assets</u></p> <p>MN46RD00002 – HoH asked, but it was not completed.</p>	<p>Condition: O/A did not properly verify income/assets/expenses/deductions/family characteristics</p> <p>Criteria: HH 4350.3 R1 C4 Par. 5-12: O/A must properly verify all income, assets, expenses, and deductions that affect family eligibility or level of assistance.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Failure to properly verify income/assets/expenses/deductions/family characteristics may result in the incorrect amount of rental subsidy being paid on behalf of the tenant.</p> <p>Corrective Action: Obtain proper form of verification. If necessary, submit a corrected 50059 via TRACS marked as correction. In response, provide a copy of the signed, corrected 50059 and supporting documentation.</p>	<p>30 days from the date of this letter</p>
<p><u>Addendum A – G – Rejection</u></p> <p>MN46RD00008 [REDACTED] Rejection letter not in file. Sample was provided. No appeal made by applicant, but unsure if applicant knew they could appeal</p>	<p>Condition: Rejection letter does not have information on appealing the decision.</p> <p>Criteria: HH 4350.3 R1 C4 P4-9 C2: The written rejection notice must give the applicant 14 days to dispute the rejection and provide persons with disabilities the right to reasonable accommodations to participate in the informal hearing process.</p> <p>Cause: Owner/Agent error</p> <p>Effect: Applicant may not be aware of their rights and fail to appeal the rejection.</p> <p>Corrective Action: Make required corrections to the rejection notice. Provide a revised rejection letter to ineligible applicants. In response, provide a copy of revised letter and assurance rejected applicant receive proper notification.</p>	<p>30 days from the date of this letter</p>
	<p>Refer to each of the File Review Spreadsheets for comments on files. The above list may not be all inclusive but covers the majority of the concerns. If you have questions, please contact Julie LaSota, Resolution Specialist, at Julie.A.LaSota@hud.gov</p>	

McDonough MN46RD00002

██████████ 12.5.2022 MI
ZERO INCOME

D. 13. Disposal of Assets question not answered 9/15/2022
A. 11. No Multiple Subsidy Report

██████████ 11.1.2022 AR/Corrected
Term'd then reinstated

B. 6. No verification of age for minor children, or lease signed by minor hwho turned 18 4.1.2022
D. 2. AR was not processed on time.
D. 3. Hamziya Dube should have signed docs on 4/1/2022 (18)
D. 18. Written Repayment Agreement - It ius unclear if this has been entered into

██████████ 2.1.2023 AR

A. 1. Application is not dated or time staped

A. 3. No 90-day report due at Move-In. Started doing her in 2022
B. 6. No Student Status Report for 2/1/2023 recert

██████████ 5.1.2022 AR

B. 3. Criminal and drug screening not in ██████████
B. 4. No Sex Offender Registry Check on file
b. 6. No Student Status Verification on file - HofH
D. 6. No new EIV. No current EIV for both residents.
D.6. it was also observed that EIV amt on 50059????
D. 6. No new EIV. No current EIV for both residents.
D. 17. Observed that income calc was not accurate. \$841 instead of \$742 for recert period.

██████████ 2/1/23 AR

B. 1. Did not have copy of date/time stamped application in file - done online
B. 3. Criminal and drug screening - tenant self certified
B. 4. No Lifetime Sex Offender Registry report in file
B. 6. No disability or student status verifcaiton (STUDENT STATUS NOT LIKELY NEEDED)
D. 11. Shown as "Elderly" on 50059, however this is "Disability" allowance

██████████ ao 3/1/2023 Interim

B. 3. Tenant in place at RAD conversion. Some Criminal and Drug Screenings are not availabile
B. 4. No Lifetime Sex Offender Registry checks on file
B. 6. No disability or student status verification documents in file
D. 5. Based on most recent IR, family is paying Market Rate (\$2,228) which is 30% of Income (RAD requirement)
SHOULD HAVE NOTED THIS AS TERMINATED FROM SUBSIDY

██████████ 11.1.2022 AR

A. 1. Application not in file. It appears resident moved in 1.1.2020 at time of RAD conversion
A. 2. 92006 Not in file for Initial Certification
B. 3. No criminal or drug screening found in file
B. 4. No Lifetime Sex Offender Registry Check on file
B. 6. No disability or student status verification (took Disability Allowance)

██████████ 8.1.2022 AR

B. 3. No criminal or drug screening on file
B. 4. No Sex Offender Registry report on file
B. 6. No student status records on file
D. 5. Wages - There was income discrepancies EIV had \$33,590.21 while 50059 has \$14,196
D. 17. Prior to MI there were monthly income discrepancies. Was investigated and is on file.

██████████ 8.1.2022 A/A

A. 1. Note in file - RAD conversion, so application not on file
B. 2. Full numbers not for all - missing last digit of perm resident card
B. 4. Note in file - Lifetime Sex Offender check not in file - RAD conversion
D. 9. Used 6 mo avg for savings (\$396) instead of current balance of \$422
D. 13. Disposal of Asets - H of H question was asked, but not completed
D. 17. Income discrepancies note. Documented in file as investigated. OK

██████████ 10.26.2022 MO

F. 1. MO 50059 present - this was Termination/Eviction
F. 3. TSD not refunded due to \$ owed \$222.07 withheld to cover AR of \$2,655, Misc. \$1,611.75, MO charrges of \$730

xx Rejection xx ██████████

4.12.2021 - Acceptable reason for rejection - background check and past due at old address \$719

MN46RD00003 - Hamline Front Seal

[REDACTED]
AR - Occupancy pre-RAD

No findings
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
MI

No findings or observations

[REDACTED]
AR - Occupancy pre-RAD

A.11 EIV Multiple Subsidy - Did not find in file
A.12. EIV Multiple Subsidy Report - not in file
D.11. Did not find verification for medical deductions
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR

A.11 EIV Multiple Subsidy - Did not find in file
A.12. EIV Multiple Subsidy Report - not in file
D.8. Nothing in file for MSA

[REDACTED]
AR - Occupancy pre-RAD

D.11. Nothing in file for medical deduction
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
MO

No findings or observations

[REDACTED]
AR - Occupancy pre-RAD

Observation: Tenant term'd due to non-compliance with AR - OK
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

Observation - Tenant term'd due to non-compliance with AR - OK
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

C.7. Lease - have current, but all old shredded
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

No findings or observations except pre-RAD file
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED] Rejected applicant
9.16.2022

No findings or observations

MN46RD00004 - Edgerton Iowa Wilson

[REDACTED] - Rejected Application

No findings or observations

[REDACTED]
AR

No findings or observations

[REDACTED]
AR - Occupancy pre-RAD

C.7.Inspection - MI Inspection not in file. Last inspection 7/9/2021
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

C.7.Inspection - MI Inspection not in file. Last inspection 9.70.2022
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR

C.7.Inspection - MI not in file. Last Insp 7.12.2021

[REDACTED]
IR - Occupancy pre-RAD

C.7.Inspection - MI inspection not in file
Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
D.3.Cert - Resident dated all docs with incorrect year. Was not caught/corrected.

[REDACTED]
MI

B.1 and 2: Copy of SS card not in file. Email indicating wallet was stolen
and they applied for new card 10.2022. Must obtain copy for file.

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
C.7.Inspection - MI not in file. Only current inspection in file

[REDACTED]
Move Out

No findings or observations

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
C.7.Inspection - MI not in file. Only current inspection in file

MN46RD00005 - Roosevelt

[REDACTED]
AR

B.1 and 2. Drivers License for other adults differs from ??

[REDACTED]
IR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
Observation: IR Rent adjustment was retroactive and a decrease.

[REDACTED]
MI

A.12. Multiple Subsidy - not in file

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.8. Race/Ethnicity - No information for foster children

[REDACTED]
AR-C - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.12. Multiple Subsidy - not in file

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.8. Race/Ethnicity: HoH only, and not signed

[REDACTED]

A.3. EIV Existing Tenant - unsure if in file
D.13 Disposal of Assets - Did not find

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.12. Multiple Subsidy - not in file
D.2. Cert Timeliness - Observation- tenant delay, not Mgmt Agent

[REDACTED]
MO - Transfer

F. Move Out: No 50059-A for Move Out - Transferred Units

[REDACTED]
Rejected Application

No findings or observations

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.11.EIV Multiple Subsidy - did not see in file
A.12.EIV Multiple Subsidy - did not see addressed
D.3. Cert Signed/Dated
- Observation - Term'd due to over income no subsidy needed

MN46RD00006 - Mt. Airy/Valley

Rejected File - [REDACTED]

No findings or observations

[REDACTED]

AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]

AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]

AR - Occupancy pre-RAD

D.19 New Hires - Not sure. Nothing checked on form

[REDACTED]

Move Out

10.17.2022 - Deceased. Had unpaid rent and damages.

[REDACTED]

IR - Occuancy pre-RAD

[REDACTED]

AR

A.10.Lease - No LBP acknowledgement at AR
A.12 Multiple Subsidy - not in file
B.3.Criminal/Drug Screen - did not find
B.4.Lifetime Sex Offender Check - did not find
C.7.Lease - MI 50059 not dated/signed
D.2.Cert Timeiness - Observation: Tenant delay, not Mgmt Agent
D.4.Cert 30-day notice: Observation - No notice needed - decrease

[REDACTED]

AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]

AR - Occuancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.10.Lease Docs - LBP ony at initial occuancy

[REDACTED]

AR - pre-RAD Occupancy

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.10.Lease Docs - LBP ony at initial occuancy

[REDACTED]

AR - pre-RAD Occupancy

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.10.Lease Docs - LBP ony at initial occuancy

MN46RD00007 Exchange Wabasha

[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
[REDACTED] MI	C.7.Lease Inspection- Observation - 2022 inspection flagged for housekeeping. Unsure if followed up.
[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
[REDACTED] MO - 3.31.2022	No record of deposit returned, however it appears there was a cleaning fee assessed
[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
[REDACTED] AR - Occupancy pre-RAD	Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result A.8.Race/Ethnicity - Form in file but filled out incorrectly
[REDACTED] MO - (Transfer??/HCV??)	No record of move out inspection or disposition of SD Unclear of actual MO date.
Rejection - [REDACTED]	Observation: Applicant appealed, however appeal denied

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
Rejection - [REDACTED]

Rejection letter not in file. Sample was provided. No appeal made by applicant, but unsure if applicant knew they could appeal

5-07A-0258
MI

A.1.Application - missing date and time stamp
A.3. EIV Existing Tenant Search: Per Ana, these were not printed up
C.2.Lease - Smoke Free Addendum - not HUD approved. Pet Policy not attached to lease or in file
D.8. Cert - income: Pension letter older than 120 days. Dated 3.11.2021, stamped 6.21.2022
No date stamp on self cert. No explanation as to why needed self cert and not getting nthird party verification
D.9.Cert Income: Did not verify interest/dividend income on Fidelity Acct.
Did not use June ending balance.

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.9.9887: Entire doc not in file. Signed 2.8.2022 and pulled EIV 12.1.2021.
D.2. Timeliness: Observation - AR prior to 12 months - due to HUD approved schedule
D.55.Income: No doc in tenant file stating hours worked or how they derived \$13101 as in come when current 6 paystubs = \$3023.38, which, when divided by 6 = \$503.90. Not enough information to determine what correct income should be.
D.9. Cert: Agent not consistent when taking beginning balance. HUD comes us with a different Cash Value of Assets. May impact amount of subsidy.
D.11 Allowances: Nothing in file as to receipts or verifications.
D.17 Inome Discrepancies: No docs in file notifying tenant of discrepancy

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
D.9.Cert Income: Indicates tenant has checking account, but no \$ amount on Cert
D.13.Disposal of Assets: Not dated

[REDACTED]
Move Out

MO 11.30.2022. Observation: Notification of charges sent within allotted time.
No evidence charges were collected.

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.9.9887: Signed over 120 prior to AR
D.8.Cert Income: COLA not applied to 2023 Social Security income

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
D.11.Allowances: It appears resident is not eligible for medical expense deduction. Resident turned 62 in Aug 2022. All medical expenses pre-date resident turning 62 and appear to be ineligible.
D15: deductions on 50059 include \$328 midical deduction whichs ineigible. Income should be \$13,295. TTP should be \$332 vs. \$324 on 50059. Assistance should be \$445 vs. \$453.
D.19: New employment in 9.2022, not reported in EIV.

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

MN46RD00009 - Dunedin, Montreal Cleveland

[REDACTED]
AR

Finding: VAWA Form 5282 in file. Must be kept in segregated file under lock and key

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]
TM/AR* - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
D.2.Cert Timeliness: Resident was TM due to noncompliance with AR, so HUD reviewed prior year AR.

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result

[REDACTED]

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
D.2.Cert Timeliness: Resident signed 8.17.22, agent signed 8.19.2022, Effective 9.1.2022
D.3.Signed/Dated: 8.24.2022 ;etter for 9.1.2022 rent adjustment

[REDACTED]
MO

11.14.2022: No findings or observations

[REDACTED]
AR

No findings or observations

[REDACTED]
AR - Occupancy pre-RAD

Converted with RAD. A.1, A.3, B.3 and B.4 not in file as a result
A.11.Multiple Subsidy Report: Not in file

[REDACTED]
MI

A.3.EIV Existing Tenant Search - No EIV summary in file
B.4.Lifetime Sex Offender Check: Not in file
D.6.Soc Sec Income: Used award letter and did not apply COLA. Award letter dated 6.3.2022; greater than 120 days from Cert. Award \$887 without 2023 COLA.

[REDACTED] - Rejection

Acceptable - no findings or observations

[REDACTED]
AR

No findings or observations

800247993_9834 Summary_McDonough

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800247993	Contract Number: MN46RD00002
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: McDonough Homes	Project Address: 1544 Timberlake Rd, St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

	A	C	TCD	
A. General Appearance and Security				Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Reg Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>75</u> is 25% of the overall score. This category is rated
14. Application Processing/Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score:				
<p>To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.</p>				

Name and Title of Person Preparing this Report: (Please type or print):

Signature: Julie LaSota, Resolution Specialist

Date: 9/28/20

Name and Title of Person Approving this Report: (Please type or print):

Signature: Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov

Date: 9/29/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

800247993_9834 Summary_McDonough

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each "C" item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
—	See attached	—
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800248727_9834 Summary_Hamline Front Seal

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

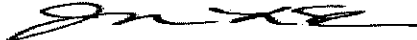
Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248727	Contract Number: MN46RD00003
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Hamline Front Seal	Project Address: 777 Hamline Ave N, St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

	A	C	TCD	
A. General Appearance and Security				Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>65</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac Ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>65</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>75</u> is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>65</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score: To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.				

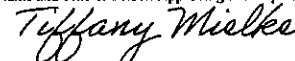
Name and Title of Person Preparing this Report: (Please type or print):



Signature: Julie LaSota, Resolution Specialist

Date: 9/28/20

Name and Title of Person Approving this Report: (Please type or print):



Signature: Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov

Date: 9/28/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only.
form HUD-9834 (06/2016)
Ref. HUD Handbook 4350.1, REV-1
and HUD Handbook 4566.2

800248727_9834 Summary_Hamline Front Seal

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
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800248728_9834 Summary_Edgerton Iowa Wilson

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248728	Contract Number: MN46RD00004
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Edgerton Iowa Wilson	Project Address: 1000 Edgerton St., St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>76</u> is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Refer to attached MOR Findings Report for Specifics.
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input type="checkbox"/>		
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score: To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.				

Name and Title of Person Preparing this Report: (Please type or print):



Signature: **Julie LaSota, Resolution Specialist**

Date: 9.28.20

Name and Title of Person Approving this Report: (Please type or print):

Signature: **Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov**

Date: _____

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only.
 form HUD-9834 (06/2016)
 Ref. HUD Handbook 4350.1, REV-1
 and HUD Handbook 4566.2

800248728_9834 Summary_Edgeron Iowa Wilson

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each "C" item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
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800248729_9834 Desk Review_Roosevelt Homes

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

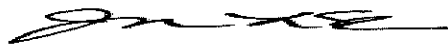
Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248729	Contract Number: MN46RD00005
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Roosevelt Homes	Project Address: 1575 Ames Ave., St., St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

	A	C	TCD	
A. General Appearance and Security				Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>75</u> is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	Refer to attached MOR Findings Report for Specifics.
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score: To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.				

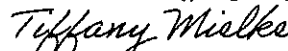
Name and Title of Person Preparing this Report: (Please type or print):



Signature: **Julie LaSota, Resolution Specialist**

Date: 9/28/20

Name and Title of Person Approving this Report: (Please type or print):



Signature: **Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov**

Date: 9/29/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only.
 form HUD-9834 (06/2016)
 Ref. HUD Handbook 4350.1, REV-1
 and HUD Handbook 4566.2

800248729_9834 Desk Review_Roosevelt Homes

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each "C" item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
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800248730_9834 Summary_Mt Airy Valley

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248730	Contract Number: MN46RD00006
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Mt. Airy Valley	Project Address: 200 Arch St., St., St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>75</u> is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	Refer to attached MOR Findings Report for Specifics.
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score:				
<p>To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.</p>				

Name and Title of Person Preparing this Report: (Please type or print):

Julie LaSota

Signature: Julie LaSota, Resolution Specialist

Date: 9.28.20

Name and Title of Person Approving this Report: (Please type or print):

Tiffany Mielke

Signature: Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov

Date: 9/29/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

800248730_9834 Summary_Mt Airy Valley

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
—	See attached	—
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800248731_9834Summary_Exchange Wabasha

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248731	Contract Number: MN46RD00007
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Exchange/Wabasha	Project Address: 545 Wabasha St N., St., St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Heid <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>76</u> is 25% of the overall score. This category is rated Refer to attached MOR Findings Report for Specifics.
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days (MOs)	
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
G. General Management Practices	A	C	TCD	
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score:				
To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.				

Name and Title of Person Preparing this Report: (Please type or print):

Julie LaSota

Signature: Julie LaSota, Resolution Specialist

Date: 9.28.20

Name and Title of Person Approving this Report: (Please type or print):

Tiffany Mielke

Signature: Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov

Date: 9/29/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. form HUD-9834 (06/2016) Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

800248731_9834Summary_Exchange Wabasha

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- o The condition describes the problem or deficiency
- o The criteria cites the statutory, regulatory or administrative requirements that were not met
- o The cause explains why the condition occurred
- o The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
—	See attached	—
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800248731_9834 Summary_Ravoux, Central, Neill

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248732	Contract Number: MN46RD00008
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Ravoux Central Neill	Project Address: 554 Central Ave W., St., St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Held <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>75</u> is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days (MOs)	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days (MOs)	
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score: To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.				

Refer to attached MOR Findings Report for Specifics

Name and Title of Person Preparing this Report: (Please type or print):

Julie LaSota

Signature: Julie LaSota, Resolution Specialist

Date: 9.28.20

Name and Title of Person Approving this Report: (Please type or print):

Tiffany Mielke

Signature: Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov

Date: 9/29/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. form HUD-9834 (06/2016)
Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

800248731_9834 Summary_Ravoux, Central, Neill

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing -- Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each "C" item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- o The condition describes the problem or deficiency
- o The criteria cites the statutory, regulatory or administrative requirements that were not met
- o The cause explains why the condition occurred
- o The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
---	See attached	---
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800248733_9834 Summary_Dunedin Montreal Cleveland

Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

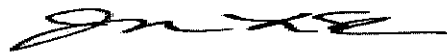
Summary

Date of On-Site Review: 2.13.2023	Date of Report: 9.28.2023	Project Number: 800248733	Contract Number: MN46RD00009
Section of the Act: 8 (RAD)	Name of Owner: St. Paul PHA	Project Name: Dunedin Montreal Cleveland	Project Address: 469 Ada St., St., St. Paul
Loan Status: <input type="checkbox"/> Insured <input type="checkbox"/> HUD-Field <input type="checkbox"/> Non-Insured <input type="checkbox"/> Co-Insured	Contract Administrator: <input checked="" type="checkbox"/> HUD <input type="checkbox"/> CA <input type="checkbox"/> PBCA	Type of Subsidy: <input checked="" type="checkbox"/> Section 8 <input type="checkbox"/> PAC <input type="checkbox"/> Section 236 <input type="checkbox"/> Section 221(d)(3) BMIR <input type="checkbox"/> Rent Supplement <input type="checkbox"/> RAP <input type="checkbox"/> PRAC <input type="checkbox"/> Unsubsidized	Type of Housing: <input checked="" type="checkbox"/> Family <input type="checkbox"/> Disabled <input type="checkbox"/> Elderly <input type="checkbox"/> Elderly/Disabled <input type="checkbox"/> Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	
1. General Appearance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
2. Security	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
B. Follow-up and Monitoring of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
C. Maintenance and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
5. Maintenance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Vacancy and Turnover	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Spec Cl Vac ongoing	
7. Energy Conservation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
D. Financial Management/Procurement	A	C	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0. <u>95</u> is 25% of the overall score. This category is rated
8. Budget Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Cash Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
10. Cost Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Procurement Controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Accounts Receivable/Payable	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Accounting and Bookkeeping	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
E. Leasing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0. <u>75</u> is 25% of the overall score. This category is rated
14. Application Processing/ Tenant Selection	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
15. Leases and Deposits	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Eviction/Termination of Assistance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
17. Enterprise Income Verification (EIV) System Access and Security Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
18. Compliance with Using EIV Data and Reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	30 days	
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Refer to attached MOR Findings Summary for specific
20. TRACS Security Requirements	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
21. Tenant File Security	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Immediately (Mills)	
22. Summary of Tenant File Review	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
F. Tenant/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
23. Tenant Concerns	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Provision of Tenant Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
G. General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0. <u>95</u> is 10% of the overall score. This category is rated
25. General Management Operations	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Owner/Agent Participation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Staffing and Personnel Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Overall Rating: <input checked="" type="checkbox"/> Superior <input type="checkbox"/> Above Average <input type="checkbox"/> Satisfactory <input type="checkbox"/> Below Average <input type="checkbox"/> Unsatisfactory <u>90</u> Overall Score:				
<p>To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.</p>				

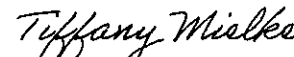
Name and Title of Person Preparing this Report: (Please type or print):



Signature: **Julie LaSota, Resolution Specialist**

Date: 9.28.20

Name and Title of Person Approving this Report: (Please type or print):



Signature: **Tiffany Mielke, Chief, Asset Resolution Branch, Tiffany.L.Mielke@hud.gov**

Date: 9/29/20

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

800248733_9834 Summary_Dunedin Montreal Cleveland

**Management Review for
Multifamily Housing Projects**

U.S. Department of Housing and Urban Development
Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178
Exp. 04/30/2018

Summary

SUMMARY REPORT – FINDINGS

For each “C” item checked on the summary report, reference the appropriate citing, and target completion date. Findings must include the condition, criteria, cause, effect and required corrective action:

- The condition describes the problem or deficiency
- The criteria cites the statutory, regulatory or administrative requirements that were not met
- The cause explains why the condition occurred
- The effect describes what happened because of the condition

Corrective actions are required for all findings.

Item Number	Finding	Target Completion Date
—	See attached	—
—		—
—		—
—		—
—		—
—		—
—		—
—		—
—		—

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL**REPORT TO COMMISSIONERS****FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR****REGARDING** Property Insurance Policy Renewal**DATE** October 25, 2023

Staff requests Board approval to renew the PHA's property insurance with the Housing Authority Insurance Group (HAI) for one year effective December 1, 2023. The estimated annual premium is \$1,044,093 (up from \$966,120, or an 8.07% increase from last year) on an insurable property value of \$907,997,876 (up 0.19% from \$906,313,761 last year). This premium increase is primarily due to two factors:

1. HAI's loss ratio for the PHA is 312% for the most recent 3-year period and 211% for the most recent 5-year period. This means for every \$1.00 paid to HAI in insurance premium, HAI is paying out an average of \$3.12 in claims for the most recent 3-year period and an average of \$2.11 in claims for the most recent 5-year period.
2. The PHA is required to insure all properties at the insurable value, which is the 100% replacement value as calculated yearly by an underwriter using an industry-standard tool called the Marshall & Swift/Boeckh (MSB) system. The MSB calculation includes factors such as the high increase in costs of goods and services, number of buildings needing insurance, construction types, age of buildings, and size of buildings being insured.

HAI insures the PHA's property through its subsidiary company, Housing Authority Property Insurance. Important factors in the coverage remain the same, including:

- A \$25,000 deductible;
- No blanket coverage; replacement cost will be subject to values on file with HAI;
- Exclusion for mold and fungi;
- Exclusion for Acts of Terrorism.

Additionally, the wind/hail deductible will remain at 5% of each individual property's insurable value. The wind/hail deductible increased from 1% of each individual property's insurable value to 5% in the previous property insurance renewal that went into effect on December 1, 2022.

Prior to the wind/hail deductible increase, the PHA saw significant damage to properties at Mt. Airy, McDonough, and Roosevelt Homes resulting from large storms that hit the Midwest in the summer of 2022. This damage was extensive enough for the PHA to issue claims with HAI to recover damages and repair the properties. The claim submission was accepted by HAI in the spring of 2023, and the PHA has started work on roof replacements at Roosevelt, Mt. Airy, and McDonough Homes. PHA contractors have finished roof replacements at Roosevelt, resulting in total funding received from HAI in the amount of \$1,006,127, and the PHA being responsible for \$394,111 in deductible costs. Roof replacement at Mt. Airy has begun and is estimated to be completed by Summer 2025. The PHA will receive an estimated \$105,666¹ from HAI for roof replacements at Mt. Airy, and the PHA will pay an estimated \$41,371 for the deductible.

McDonough roof replacement construction is set to begin in Spring 2024 and construction is estimated to be completed by Spring 2025. To complete the roof replacement project at McDonough Homes, staff has estimated that HAI will provide \$3,624,676 in claim funding, and the PHA will be responsible for \$1,045,740 in deductible costs.

In total, HAI will pay an estimated \$4,736,469 toward the cost of complete roof replacements at Roosevelt, Mt. Airy, and McDonough; and the estimated deductible the PHA will pay is \$1,481,222. Completing these repairs is essential to keeping PHA properties in safe, livable condition. The increasing cost of the property insurance premium is more than offset by the

¹ This figure does not include a supplemental addition of 5 roofs at a cost of approximately \$150,000. Responsibility for this amount is still being determined.

payments received from HAI based on these claims. As a capital member of the Housing Authority Risk Retention Group (HARRG) and Housing Authority Property Insurance (HAPI), the PHA receives dividend distributions as shown in the attached table. As of FY 2024, the dividends have totaled \$1.58 million. The dividends are paid to the PHA in the form of a check and are deposited in the Central Office Cost Center (COCC) as “Other Income”.

Sufficient funds have been budgeted for property insurance in the FY 2024 Operating Budgets and will be included in staff’s recommendations to the Board for the FY 2025 Operating Budgets.

WW/MGB

Attachment History of HAI Dividend Payments to the PHA

PHA FISCAL YEAR	DIVIDEND
FY 2007	\$68,882
FY 2008	\$164,479
FY 2009	\$43,758
FY 2010	\$172,011
FY 2011	\$136,216
FY 2012	\$151,863
FY 2013	\$114,932
FY 2014	\$102,765
FY 2015	\$88,062
FY 2016	\$60,584
FY 2017	\$55,333
FY 2018	\$0
FY 2019	\$43,804
FY 2020	\$46,676
FY 2021	\$113,349
FY 2022	\$17,349
FY 2023	\$101,770
FY 2024	\$75,605
TOTAL	\$1,577,438

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL**REPORT TO COMMISSIONERS****FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR****REGARDING** Investment Policy Update**DATE** October 25, 2023

Staff recommends Board approval of Resolution No. 23-10/25-02 revising the investment policy to allow the Agency to invest in certificates of deposit (CDs) and other evidences of deposit at financial institutions insured by the National Credit Union Administration (NCUA). The NCUA is an independent federal agency created by the United States Congress to regulate, charter, and supervise federal credit unions. The NCUA fulfills the same function that the Federal Deposit Insurance Corporation (FDIC) performs for commercial banks and savings institutions. The NCUA is backed by the full faith and credit of the United States' government, and fully insures deposits up to \$250,000. The proposed policy revisions will allow the Agency greater flexibility to pursue a wider range of investment securities which may yield higher returns to support the Agency's programs. The securities would still be backed by the full faith and credit of the U.S. government, and adhere to Department of Housing and Urban Development (HUD) investment regulations and Government Finance Officers' Association (GFOA) investment best practices. A copy of the proposed policy is attached, with deletions ~~interlined~~ and new text underlined.

The Agency's investment policy covers all investments except those relating to the pension fund. Pension Fund participants make their own decisions on allocating investments between the various choices available.

The investment policy requires pooling of cash for investment purposes, allowing for (but not requiring) the use of larger securities with potentially higher rates of earnings. The proper distribution of earnings is handled through accounting allocation procedures. The investment

objectives are clearly defined as safety, liquidity, and yield, in that order. The Executive Director or his designee is authorized to handle investment transactions. The policy states certain minimum standards for the depository institution, as well as directions regarding safekeeping, custody, authorized investment types, investment parameters and reporting. The policy states that PHA management will review this policy on an annual basis and recommend amendments as needed. The last revision to the agency's investment policy was approved by the Board on August 23, 2006.

WW

Attachments: Resolution No. 23-10/25-02
Proposed Investment Policy

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

RESOLUTION NO. 23-10/25-02

INVESTMENT POLICY

WHEREAS, the Public Housing Agency of the City of Saint Paul (PHA) administers the Rental Assistance Demonstration/Project-Based Rental Assistance Program, Low Rent Public Housing Program and the Housing Choice Voucher/Section 8 Program in the City of Saint Paul; and

WHEREAS, in the course of administering these programs the PHA handles substantial amounts of money, consisting primarily of federal subsidy payments, tenant rents and income from rental of the Central Administrative Office building at 555 North Wabasha Street in Saint Paul; and

WHEREAS, staff has recommended amendment of the attached Investment Policy to allow for investment in certificates of deposit and other evidences of deposit at financial institutions insured by the National Credit Union Administration (NCUA); and

WHEREAS, the Board finds that the recommended Investment Policy is appropriate and in the best interests of the Agency;

NOW THEREFORE BE IT RESOLVED, by the Board of Commissioners of the Public Housing Agency of the City of Saint Paul, that the attached Investment Policy is approved.

Public Housing Agency of the City of Saint Paul Investment Policy

~~Board approved August 23, 2006~~
Revision Recommended for Board Approval October 25, 2023

I. Governing Authority

Legality

The investment program shall be operated in conformance with federal, state, and other legal requirements.

II. Scope

A. *All Funds Included.*

This policy applies to the investment of all funds, excluding the investment of employees' retirement funds.

B. *Pooling of Funds.*

Except for cash in certain restricted and special funds, the Public Housing Agency of the City of Saint Paul (PHA) will consolidate cash and reserve balances from all funds to maximize investment earnings and to increase efficiencies with regard to investment pricing, safekeeping and administration. Investment income will be allocated to the various funds based on their respective participation and in accordance with generally accepted accounting principles.

III. General Objectives

The primary objectives, in priority order, of investment activities shall be safety, liquidity, and yield:

A. *Safety*

Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to ensure the preservation of capital in the overall portfolio. The objective will be to mitigate credit risk and interest rate risk.

1. Credit Risk: The PHA will minimize credit risk, which is the risk of loss due to the failure of the security issuer or backer, by:
 - a. Limiting investments to the types of securities listed in Section VII of this Investment Policy;
 - b. Pre-qualifying the financial institutions, broker/dealers, intermediaries, and advisers with which the PHA will do business in accordance with Section V; and

- c. Diversifying the investment portfolio so that the impact of potential losses from any one type of security or from any one individual issuer will be minimized.
2. Interest Rate Risk: The PHA will minimize interest rate risk, which is the risk that the market value of securities in the portfolio will fall due to changes in market interest rates, by:
 - a. Structuring the investment portfolio so that securities mature to meet cash requirements for ongoing operations, thereby avoiding the need to sell securities on the open market prior to maturity; and
 - b. Investing operating funds primarily in shorter-term securities, money market mutual funds, or similar investment pools and limiting the average maturity of the portfolio in accordance with this policy. (See section VIII.)

B. *Liquidity*

The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated. This is accomplished by structuring the portfolio so that securities mature concurrent with cash needs to meet anticipated demands (static liquidity). Furthermore, since all possible cash demands cannot be anticipated, the portfolio should consist largely of securities with active secondary or resale markets (dynamic liquidity). Alternatively, a portion of the portfolio may be placed in money market mutual funds or local government investment pools which offer same-day liquidity for short-term funds.

C. *Yield*

The investment portfolio shall be designed with the objective of attaining a market rate of return throughout budgetary and economic cycles, taking into account the investment risk constraints and liquidity needs. Return on investment is of secondary importance compared to the safety and liquidity objectives described above. Investments are limited to relatively low risk securities in anticipation of earning a fair return relative to the risk being assumed. Securities shall generally be held until maturity with the following exceptions:

1. A security with declining credit may be sold early to minimize the risk of loss of principal;
2. A security swap may be implemented in order to improve the quality, yield, or target duration in the portfolio; or
3. Liquidity needs of the portfolio require that the security be sold.

IV. Standards of Care

A. Prudence

The standard of prudence to be used by investment officials shall be the "prudent person" standard and shall be applied in the context of managing an overall portfolio. Investment officers acting in accordance with written procedures and this investment policy and exercising due diligence shall be relieved of personal responsibility for an individual security's credit risk or market price changes, provided deviations from expectations are reported in a timely fashion and the liquidation and the sale of securities are completed in accordance with the terms of this policy.

The "prudent person" standard states that, "Investments shall be made with judgment and care, under circumstances then prevailing, which persons of prudence, discretion and intelligence exercise in the management of their own affairs, not for speculation, but for investment, considering the probable safety of their capital as well as the probable income to be derived."

B. Ethics and Conflicts of Interest

Officers and employees involved in the investment process shall refrain from personal business activity that could conflict with the proper execution and management of the investment program, or that could impair their ability to make impartial decisions. Employees and investment officials shall disclose any material personal interests in financial institutions with which they conduct business on behalf of the Agency. They shall further disclose any personal financial/investment positions that could be related to the performance of the investment portfolio. Employees and officers shall refrain from undertaking personal investment transactions with the same individual with whom business is conducted on behalf of the PHA.

C. Delegation of Authority

Authority to manage the investment program is derived from the PHA Bylaws and is granted to the Executive Director who may further delegate that responsibility and authority. Management of the investment program shall be in accordance with established written procedures and internal controls for the operation of the investment program consistent with this investment policy. Procedures should include references to: safekeeping, delivery vs. payment, investment accounting, repurchase agreements, wire transfer agreements, and collateral/depository agreements. No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the Executive Director or his/her designee. The investment manager shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

V. Authorized Financial Institutions, Depositories, and Broker/Dealers

- A. A list will be maintained of financial institutions and depositories authorized to provide investment services. In addition, a list will be maintained of approved security broker/dealers selected by creditworthiness (e.g., a minimum capital requirement of

\$10,000,000 and at least five years of operation). These may include "primary" dealers or regional dealers that qualify under Securities and Exchange Commission (SEC) Rule 15C3-1 (uniform net capital rule).

- B. All financial institutions and broker/dealers who desire to become qualified for investment transactions must supply the following as appropriate:
1. Audited financial statements demonstrating compliance with state and federal capital adequacy guidelines
 2. Proof of National Association of Securities Dealers (NASD) certification (not applicable to Certificate of Deposit counterparties)
 3. Proof of state registration
 4. Completed broker/dealer questionnaire (not applicable to Certificate of Deposit counterparties)
 5. Certification of having read and understood and agreeing to comply with the PHA's investment policy.
 6. Evidence of adequate insurance coverage.
- C. An annual review of the financial condition and registration of all qualified financial institutions and broker/dealers will be conducted by the investment manager.

VI. Safekeeping and Custody

A. Delivery vs. Payment

- B. All trades of marketable securities will be executed by delivery vs. payment (DVP) to ensure that securities are deposited in an eligible financial institution prior to the release of funds.

C. Safekeeping

Securities will be held by an independent third-party custodian selected by the entity as evidenced by safekeeping receipts in the PHA's name. The safekeeping institution shall annually provide a copy of their most recent report on internal controls (Statement of Auditing Standards No. 70, or SAS 70).

D. Internal Controls

The investment manager is responsible for establishing and maintaining an internal control structure designed to ensure that the assets of the PHA are protected from loss, theft or misuse. Details of the internal controls system shall be documented in an investment procedures manual and shall be reviewed and updated annually. The internal control structure shall be designed to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognizes that (1) the cost of a control

should not exceed the benefits likely to be derived and (2) the valuation of costs and benefits requires estimates and judgments by management.

The internal controls structure shall address the following points:

1. Control of collusion
2. Separation of transaction authority from accounting and recordkeeping
3. Custodial safekeeping
4. Avoidance of physical delivery of securities
5. Clear delegation of authority to subordinate staff members
6. Written confirmation of transactions for investments and wire transfers
7. Dual authorizations of wire transfers
8. Development of a wire transfer agreement with the lead bank and third-party custodian

Accordingly, the investment manager shall establish a process for an annual independent review by an external auditor to assure compliance with policies and procedures or alternatively, compliance should be assured through the PHA's annual independent audit.

VII. Suitable and Authorized Investments

A. Investment Types

Consistent with the GFOA Policy Statement on State and Local Laws Concerning Investment Practices, the following investments will be permitted by this policy and are those defined by HUD, and state law where applicable:

1. U.S. Treasury obligations which carry the full faith and credit guarantee of the United States government and are considered to be the most secure instruments available;
2. U.S. government agency or U.S. government sponsored agency's obligations that have a liquid market with a readily determinable market value;
3. Certificates of deposit and other evidences of deposit at financial institutions insured by the Federal Deposit Insurance Corporation or National Credit Union Administration,
4. Repurchase agreements whose underlying purchased securities consist of the aforementioned instruments;

5. Money market mutual funds regulated by the Securities and Exchange Commission and whose portfolios consist only of dollar-denominated securities; and
6. Local government investment pools either state-administered or developed through joint powers statutes and other intergovernmental agreement legislation.
7. Other forms as may be permitted by HUD and state law.

B. Collateralization

Collateralization will be required on all demand deposit accounts, including checking accounts and non-negotiable certificates of deposit in an amount (at market value) at least equal to 110% of the amount on deposit which is in excess of the FDIC insured amount, plus accrued interest at the close of the business day.

VIII. Investment Parameters

A. Diversification

The investments shall be diversified by:

1. Limiting investments to avoid overconcentration in securities from a specific issuer or business sector (excluding U.S. Treasury securities),
2. Limiting investment in securities that have higher credit risks,
3. Investing in securities with varying maturities, and
4. Continuously investing a portion of the portfolio in readily available funds such as local government investment pools (LGIPs), money market funds, overnight repurchase agreements, or other interest bearing accounts to ensure that appropriate liquidity is maintained in order to meet ongoing obligations.

B. Maximum Maturities

1. To the extent possible, the PHA shall attempt to match its investments with anticipated cash flow requirements. Unless matched to a specific cash flow, the PHA will not directly invest in securities maturing more than five (5) years from the date of purchase or in accordance with state statute and local ordinance, which ever is the lesser time to maturity. The PHA shall adopt weighted average maturity limitations, consistent with the investment objectives.
2. Reserve funds and other funds with longer-term investment horizons may be invested in securities exceeding five (5) years if the maturities of such investments are made to coincide as nearly as practicable with the expected use of funds. The intent to invest in securities with longer maturities shall be disclosed in writing to the PHA Board.
3. Because of inherent difficulties in accurately forecasting cash flow requirements, a portion of the portfolio should be continuously invested in readily available funds

such as local government investment pools, money market funds, or overnight repurchase agreements to ensure that appropriate liquidity is maintained to meet ongoing obligations.

C. Competitive Bids

The investment officer shall obtain competitive bids from at least three brokers or financial institutions on all purchases of investment instruments purchased on the secondary market.

IX. Reporting

A. Methods

The investment manager shall prepare an investment report at least quarterly, including a management summary that provides an analysis of the status of the current investment portfolio and the individual transactions executed over the last quarter. This management summary will be prepared in a manner which will allow the PHA to ascertain whether investment activities during the reporting period have conformed to the investment policy. The report should be provided to the PHA's Executive Director, and Board. The report will include the following:

1. Listing of individual securities held at the end of the reporting period.
2. Realized and unrealized gains or losses resulting from appreciation or depreciation by listing the cost and market value of securities over one-year duration that are not intended to be held until maturity (in accordance with Governmental Accounting Standards Board (GASB) requirements).
3. Average weighted yield to maturity of portfolio on investments as compared to applicable benchmarks.
4. Listing of investment by maturity date.
5. Percentage of the total portfolio which each type of investment represents.

B. Performance Standards

The investment portfolio will be managed in accordance with the parameters specified within this policy. The portfolio should obtain a market average rate of return during a market/economic environment of stable interest rates. A series of appropriate benchmarks shall be established against which portfolio performance shall be compared on a regular basis. The benchmarks shall be reflective of the actual securities being purchased and risks undertaken, and the benchmarks shall have a similar weighted average maturity as the portfolio.

C. *Marking to Market*

The market value of the portfolio shall be calculated at least annually and a statement of the market value of the portfolio shall be included in the audited annual financial statements.

X. Policy Considerations

A. *Exemption*

Any investment currently held that does not meet the guidelines of this policy shall be exempted from the requirements of this policy. At maturity or liquidation, such monies shall be reinvested only as provided by this policy.

B. *Amendments*

This policy shall be reviewed on an annual basis. Any changes must be approved by the investment manager and any other appropriate authority, as well as the individuals charged with maintaining internal controls.

XI. Approval of Investment Policy

The investment policy shall be formally approved and adopted by the Board of Commissioners of the PHA and reviewed annually by PHA staff.

PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL

REPORT TO COMMISSIONERS

**FROM JON M. GUTZMANN
EXECUTIVE DIRECTOR**

REGARDING Utility Allowances for Multifamily/
Project-Based Rental Assistance (PBRA)
Family Housing Properties

DATE October 25, 2023

Staff requests Board approval of Resolution No. 23-10/25-03 to adjust the utility allowances for the four family housing developments that were converted to HUD’s Multifamily Housing/Project-Based Rental Assistance (PBRA) program under Rental Assistance Demonstration (RAD). As explained below, it is necessary to increase the utility allowances for all unit sizes at each of the four family housing sites, effective January 1, 2024. The affected properties are as follows:

- McDonough Homes (592 units; RAD/PBRA Project 1)
- Roosevelt Homes (320 units; Project 4)
- Mt. Airy Homes (302 units; in Project 5) and
- Dunedin Terrace (88 units; in Project 8).

As explained further below, the recommended utility allowances are substantially higher for all unit sizes, based on the analysis of actual utility costs. Consequently, residents will pay less to the PHA for rent.¹ However, as another benefit of the RAD-PBRA conversion, HUD’s HAP subsidies to the PHA will increase to offset the reduced rent, for all occupied units. There is no net cost to the PHA from increasing utility allowances.

The methodology, adjustment factors, and recommended utility allowances for each unit size at each property are shown in the attachments. The proposed changes are in the process of being

¹ Residents pay 30% of their adjusted income for rent and utilities. When the utility allowance goes up, the tenant’s rent paid to the PHA goes down by the same amount.

reviewed and approved by HUD Field Office staff, who requested that the PHA submit them in advance of the Board approval to allow additional time for review. Once the utility allowances are approved by HUD and the Board, the Agency will submit the rent schedules – which incorporate the 7.3% operating cost adjustment factor (OCAF) increase approved by the Board at the August 23, 2023, meeting – to HUD for final approval to go into effect on January 1, 2024. The contract rent schedules do not require Board approval, so staff will provide an Informational Report to the Board at the December 20, 2023 meeting, showing the new contract rents for the RAD-PBRA projects.

The utility allowance is an estimate of the monthly utility costs paid by the tenant in a subsidized rental home or apartment in PBRA, Public Housing or the Housing Choice Voucher (HCV) program. HUD defines it as the “monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances.”² The utility allowance reduces the amount of rent the household must pay to the PHA (in PBRA or public housing) or to the property owner/landlord (in HCV). The tenant’s rent payment plus the utility allowance equals 30% of the household’s adjusted income. When the utility allowance goes down, the tenant’s rent payment to the PHA goes up by the same amount. Alternatively, when the utility allowance goes up, the tenant’s rent payment to the PHA goes down by the same amount. In some cases, the tenant’s utility allowance is higher than their income-based rent amount, so the PHA sends the resident a monthly “utility reimbursement” check. (This payment is sometimes called “negative rent”.) HUD reimburses the PHA through the monthly Housing Assistance Payment (HAP), which is based on vouchers the PHA submits monthly.

² 24 CFR Part 5.603; quoted in HUD Multifamily Housing Notice H-2015-04

In Multifamily/PBRA housing, the amount of the HAP subsidy the PHA receives from HUD is based on the contract rent for each month. Lower rent payments caused by higher utility allowances increases the subsidy received by the PHA amount dollar-for-dollar, resulting in no net cost or benefit to the PHA.

HUD's rules and the Handbook for Multifamily Housing require an annual analysis of utility allowances in conjunction with annual adjustments of contract rents. HUD requires a full analysis of actual usage data to be performed every three years but allows owners (such as the PHA) to perform "factor-based" utility analysis for the two interim years. The last full analysis was performed in 2021. For 2024, a fully utility analysis was performed. The 2024 baseline utility allowances were based on a review of actual average utility costs for twelve months for a sample of family units at each site.³ Xcel Energy provided the data (at a cost of \$5 service fee per each unit requested) after receiving signed releases from the residents of all the units included in the samples. St. Paul District Energy provided data (at no cost to the PHA) for heating expenses for family units at Mt. Airy Homes. HUD dictates the minimum sample sizes and provides spreadsheets that calculate the average utility costs for each unit size at each project.⁴

The utility allowances for each family development are detailed in an attachment to this report. For the next two years, the PHA will use the factor-based utility analysis approach to set the utility allowances for 2025 and 2026. The next full analysis of actual usage data will be required to establish new baseline utility allowance rates for the RAD-PBRA projects in 2027.

³ Hi-rise residents do not pay separate utility bills, so there is no utility allowance for those units. The scattered site single family homes and duplexes remaining in the Low Rent Public Housing program are not included in this recommendation.

⁴ HUD Multifamily Notice H-2015-04

Under the recommended utility allowances, all family residents would see their monthly utility allowance go up by at least \$16 per month. For residents with larger households in larger unit sizes, the increases to utility allowances for CY 2024 are as much as \$81 per month.

Staff have submitted the proposed changes and supporting analysis to HUD Multifamily as required.⁵ With the Board's approval of the utility allowances, staff will provide notice to residents regarding the changes to the rent schedules for 2024.

WW/FAH

Attachments:

- Resolution No. 23-10/25-03 Utility Allowances for Multifamily/PBRA Family Properties
- Proposed 2024 Utility Allowances for Multifamily/PBRA Family Properties

⁵ 24 CFR § 880.610 Adjustment of utility allowances. In connection with annual and special adjustments of contract rents, the owner must submit an analysis of the project's Utility Allowances. Such data as changes in utility rates and other facts affecting utility consumption should be provided as part of this analysis to permit appropriate adjustments in the Utility Allowances.

**PUBLIC HOUSING AGENCY OF THE CITY OF SAINT PAUL
RESOLUTION NO. 23-10/25-03**

**RENTAL ASSISTANCE DEMONSTRATION (RAD) CONVERSION TO
PROJECT-BASED RENTAL ASSISTANCE (PBRA);
APPROVAL OF UTILITY ALLOWANCE SCHEDULE**

WHEREAS, the Public Housing Agency of the City of Saint Paul (PHA) was approved by the U.S. Department of Housing & Urban Development (HUD) to convert 3,836 dwelling units of Low Income Public Housing (LIPH; Section 9) to Project-Based Rental Assistance (PBRA; Section 8), through HUD's Rental Assistance Demonstration (RAD) program, with an effective date of January 1, 2020 for the Housing Assistance Payments Contracts for all eight RAD Projects; and

WHEREAS, public housing agencies that are converting public housing units to PBRA through RAD are required annually to analyze and adjust utility allowances, if necessary, for all properties in which tenants are responsible to pay for utilities; so that all households will pay 30% of adjusted income for rent including utility costs; and

WHEREAS, the PHA has obtained and analyzed actual utility costs for the required number of units and following HUD guidance has determined that it is necessary to adjust the utility allowances for all unit sizes at each family housing site, effective January 1, 2024; and

WHEREAS, the Board of Commissioners finds that the proposed Utility Allowance Schedule is necessary and appropriate, as part of the PHA's continued operations under Project-Based Rental Assistance (PBRA) through HUD's Rental Assistance Demonstration (RAD) program, to best serve the needs of PHA residents;

NOW THEREFORE BE IT RESOLVED by the Board of Commissioners of the Public Housing Agency of the City of Saint Paul, as follows:

1. The attached Utility Allowance Schedule is approved as presented, effective January 1, 2024;
2. The Executive Director or his designee is authorized to provide the required notification of utility allowance changes to all affected residents; and
3. Pursuant to HUD notice dated January 11, 1990, the PHA certifies that no employee is serving in a variety of positions that will exceed 100 percent of his or her work time.

CY 2024 RAD-PBRA Utility Allowance Summary

2023 Utility Allowance
 2024 Utility Allowance
Total Increase/(Decrease)
Percentage Increase

McDonough				
1 BR	2BR	3 BR	4 BR	5 BR
59	94	124	126	136
81	126	175	184	216
22	32	51	58	80
37.3%	34.0%	41.1%	46.0%	58.8%

2023 Utility Allowance
 2024 Utility Allowance
Total Increase/(Decrease)
Percentage Increase

Roosevelt			
1 BR	2 BR	3 BR	4 BR
46	84	98	121
68	123	167	172
22	39	69	51
47.8%	46.4%	70.4%	42.1%

2023 Utility Allowance
 2024 Utility Allowance
Total Increase/(Decrease)
Percentage Increase

Mt Airy			
2 BR	3 BR	4 BR	5 BR
145	153	172	222
161	213	253	281
16	60	81	59
11.0%	39.2%	47.1%	26.6%

2023 Utility Allowance
 2024 Utility Allowance
Total Increase/(Decrease)
Percentage Increase

Dunedin			
2 BR	3 BR	4 BR	5 BR
86	103	124	125
118	151	177	185
32	48	53	60
37.2%	46.6%	42.7%	48.0%