



300 Third Avenue NE
Crosby, MN 56441-1642

PHONE (218) 546-5088
FAX (218) 546-5041
www.crosbyhra.org

Crosby HRA Board Meeting
Tuesday, June 9, 2020 at 11:00 a.m.
Webex Video/Teleconference

Join from your browser: <https://meetingsamer8.webex.com/meetingsamer8/j.php?MTID=m8998617f4792d8175e811983ea525c18>

Join by phone: (408) 418-9388

Meeting number (access code): 126 971 4280

Meeting password: 3001

AGENDA

- 1. Call to Order**
- 2. Roll Call**
- 3. Reading and Approval of Minutes** (*Attachments 1*)
- 4. Bills and Communications**
 - a. Financial Report (*Attachment 2*)
 - b. Housing Manager Report (*Attachment 3*)
- 5. Unfinished Business**
- 6. New Business**
 - a. Approval of Updated Policies (*Attachment 4*)
 - » Access to Public Records Policy
 - » EIV Security Policy
 - » Record Retention Policy
- 7. Adjournment**

Next Meeting: Tuesday, July 14, 2020

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Minutes of the May 12, 2020, Crosby HRA Board Meeting

The regular meeting of the commissioners of the Housing and Redevelopment Authority of Crosby was held at 11:00 a.m., Tuesday, May 12, 2020, via Webex teleconference.

1. **CALL TO ORDER:** Chair Peeples called the meeting to order at 11:05 a.m.
2. **ROLL CALL:** Present at the meeting were Chair Linda Peeples and Commissioners Julie McGinnis, Renae Marsh, and Margaret Saba. Also present were Interim Executive Director/ Finance Director Karen Young, Housing Manager Shannon Fortune, Housing Specialist Mallory Smith, and Executive Assistant LeAnn Goltz. Absent: Buzz Neprud.

3. **READING AND APPROVAL OF MINUTES FROM PREVIOUS MEETING:**

Commissioner Marsh moved to approve the minutes from the March 24th and March 26th, 2020, board meetings, seconded by Commissioner McGinnis. Via roll call vote, all commissioners were in favor of the motion and none were opposed. The minutes were approved.

4. **BILLS AND COMMUNICATIONS:**

- a. **Financial Report:** Young provided financial information for March and April 2020.

2020 Audit: The 2020 audit fieldwork is tentatively scheduled with CliftonLarsonAllen (CLA) during the week of June 22nd.

Capital Fund Program Grant (CFP): The 2020 CFP obligation from HUD was awarded in the amount of \$101,828, the largest funding amount received in the history of the program.

CARES Act Supplemental Operating Funds: The CARES Act provided additional PH Operating Funds to prevent, prepare for, and respond to coronavirus, including to provide additional funds for public housing agencies to maintain normal operations and take other necessary actions during the period that the program is impacted by coronavirus. We were notified of an additional \$13,220 in Operating Funds for the above mentioned uses. The funds can only be used for current eligible expenses and expire at the end of the year.

Executive Director Search: The Executive Director position profile was posted for a second time by our consultant and closed on April 15th. Six applications were received as a result of the job posting. The Brainerd HRA hiring committee met and selected three of the six applicants to go through a video interview process. This was not an interactive process but one in which the consultant selected 6–8 questions in which the candidates had about 1.5 minutes to respond to each question. The hiring committee reviewed the applicant information and interviews and selected one finalist for an interview. The Brainerd HRA Board set May 27th as the interview date. The Brainerd Fire Department Training Room is reserved for the interviews as it is larger than the HRA conference room and would allow for social distancing.

Commissioner McGinnis made a motion to approve March checks numbered 117603 through 117666 and March ACH payments numbered 114 through 116 and 1358 through 1363 as well as April checks numbered 117667 through 117686 and April ACH payments numbered 117 and 1364 through 1369. Commissioner Marsh seconded the motion. Through roll call vote, all commissioners were in favor of the motion and none were opposed. The motion was approved.

b. Housing Manager Report:

COVID-19 Planning/Update: After contact with a potentially infected tenant, Public Health advised that Tony, Devon, and Mallory should initiate a 14-day self-quarantine. The quarantine began Friday, April 3rd and ended Friday, April 17th for Tony, Monday, April 20th for Devon, and Tuesday, April 21st for Mallory. (Mallory was out for an extra two days for her wedding.) Initially when maintenance staff came back, they were alternating work days and isolating as much as possible, except for high-priority work orders. A laptop was procured for Mallory, who was able to continue to work at home during her quarantine. Currently, Mallory is working in the office; however, the office is closed to the public, with all business being conducted over the phone, via email, mail and the drobox. Cleaning/sanitizing is being done daily in the building, in addition to the regular twice-weekly cleaning normally provided by the housekeeping service. All common areas except the laundry rooms remain closed. All tenant activities are cancelled until further notice. To help provide helpful information to tenants and applications, LeAnn and Mallory have updated the website and the Facebook page with postings and resources.

Monthly Property Performance Report for April 2020: Fortune reviewed the performance report and informed the Board that she will be adjusting this report moving forward so that it coincides with Crosby's fiscal year, which starts in April.

Policy Updates: The goal of staff is to get all required policies reviewed and provided to the Board for approval in a one-year period. The Board can expect two to four policies to review and approve on a monthly basis, starting now and going through next March.

5. **UNFINISHED BUSINESS:** Nothing to report.

6. **NEW BUSINESS**

- a. **Discussion on HUD Notice PIH 2020-05:** On March 27th, 2020, President Trump signed the CARES Act into law, which further provides HUD with broad authority, in the context of the current public health emergency, to waive statutes and regulations for the Public Housing program. The waivers implemented through this notice provide administrative relief and allow for alternative approaches to various aspects of PHA operations. HUD encourages PHAs to apply the waivers authorized in this notice based on local circumstances and needs.

PHAs are required to keep written documentation that record which waivers the PHA applied to their programs(s) and the effective dates. A PHA does not need to notify HUD or receive HUD approval to begin utilizing these waivers/alternative requirements. However, HUD may subsequently require the PHA to provide information to HUD on the waivers used by the PHA and the date the PHA applied the waiver to its program(s). If a PHA chooses to apply any of the waivers provided for in this notice, the PHA is required to notify residents and owners of any impacts that the waiver and alternative requirement (where applicable) may have on them by whatever means it considers most effective as soon as practicable.

PHAs are not required to receive formal Board approval to implement these waivers nor are they required to go through a public hearing process. These waivers can go into effect immediately as based on the local needs and conditions. Staff has gone through the notice and selected the waivers that will currently benefit our PH program for administrative relief with an effective date equal to the date of this notice. The PHA may adopt the use of these waivers at any time throughout the period of availability as defined in the notice. Any informally adopted waivers under this notice must be formally adopted as soon as practicable following June 30th, 2020, but no later than July 31st, 2020. We will seek formal board approval at the July meeting.

b. **Approval of Updated Policies:**

- » **Rental Payment Policy:** This policy mirrors verbiage contained in the leases and resident handbooks regarding late fees and payment timelines, how payments may be submitted, and reflects the agency's decision to not accept cash payments.

Moved by Commissioner Marsh followed by a second from Commissioner McGinnis to adopt Resolution No. 2021-01 approving the Rental Payment Policy. Through a roll call vote, all commissioners were in favor and none were opposed. The motion passed.

- » **Pet Ownership Policy – Family Units:** This policy reiterates the deposit amounts (\$100.00, refundable) and animal rules laid out in the resident handbook, including appropriate care requirements. Fortune clarified that the pet deposit does not apply to assistance animals or service animals. Regardless, all tenants are responsible for their animals and any damages that may occur.

The Board had a discussion about the first rule of the policy that states, “A pet will generally be defined as a common household pet, i.e., cats and dogs.” They felt the definition of a household pet should be more specific and requested that it be changed to, “A pet is defined as a cat or dog.”

Moved by Commissioner McGinnis and seconded by Commissioner Marsh to adopt Resolution No. 2021-02 approving the Pet Ownership Policy – Family Units as amended by defining a common household pet as a cat or dog. Through a roll call vote, all commissioners were in favor and none were opposed. The motion passed.

- » **Pet Ownership Policy – Dellwood/Edgewood, Resolution No. 2021-03:** This policy reiterates the deposit amounts (\$100.00, refundable) and animal rules laid out in the resident handbook, including appropriate care requirements.

The Board requested the same change to this policy as was made for the Pet Ownership Policy - Family Units.

Moved by Commissioner McGinnis and seconded by Commissioner Saba to adopt Resolution No. 2021-03 Approving the Pet Ownership Policy – Dellwood/Edgewood as amended by defining a common household pet as a cat or dog. Through a roll call vote, all commissioners were in favor and none were opposed. The motion passed.

- » **Section 504 Non-Discrimination, Resolution No. 2021-04:** This policy is related to the agency’s policy of non-discrimination on the basis of disability status.

Moved by Commissioner McGinnis and seconded by Commissioner Marsh to adopt Resolution No. 2021-04 approving the Section 504 Non-Discrimination. Through a roll call vote, all commissioners were in favor and none were opposed. The motion passed.

7. NEXT MEETING: Tuesday, June 9th, 2020

8. ADJOURNMENT:

Moved and seconded by Commissioners McGinnis and Marsh, the meeting was adjourned at 12:12 p.m.



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To: Crosby HRA Board Members
From: Karen Young, Finance Director
Date: June 3, 2020
Re: June Financial Report

Please find attached the financial information for May 2020.

2020 Audit

We confirmed that given the current COVID-19 concerns, the 2020 audit fieldwork scheduled with CliftonLarsonAllen (CLA) during the week of June 22nd will be performed remotely and not on-site.

Executive Director Search

The Brainerd HRA Board conducted interviews on May 27th with the final candidate selected by the hiring committee. Upon completion of the interview process, the Brainerd HRA Board took action offering the position to Eric Charpentier, contingent on HUD approval. Eric accepted the offer also contingent on HUD approval. The formal offer has been withheld at this time awaiting HUD approval.

Until recently, Eric served as a Brainerd HRA Board Member, which requires HUD approval in order to hire a former board member as an employee. A waiver request has been submitted to HUD.

Action Requested:

Approval of May checks numbered 117687 through 117719 and May ACH payments numbered 1370 through 1377.

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Crosby Housing & Redevelopment Authority 2021 Ratios

FASS Ratios	Max Pts	Scoring	Apr	May
Quick Ratio	12	QR <1 =0-, QR >2 =12	12.00	12.00
Months Expendable Net Assets	11	MENA <1.0= 0, ME >4 =11	11.00	11.00
Debt Svc Coverage	2	DSC < 1 = 0, DSC >1.25 =2	2.00	2.00
Total Points	25		25.00	25.00

MASS Ratios	Max Pts	Scoring	Apr	May
Occupancy	16	O <90%=0, O >98%=16	16.00	16.00
Tenant Accounts Receivable	5	TAR <1.5%=5, TAR >2.5%=0	0.00	5.00
Accounts Payable	4	AP < .75 = 4, AP >1.5 =0	4.00	4.00
Total Points	25		20.00	25.00

Total of Above Ratios	50		45	50
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MASS Ratios	Max Pts	Scoring	Apr	May
Timeliness of Obligation	5	>90% at OED = 5 <90% at OED = 0	5.00	5.00
Occupancy Rate	5	OR <93% = 0, OR >96% =5 Must have 5 points or	5.00	5.00
Total Points	10	Capital Fund Troubled	10.0	10.0

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PH Operating - Board
Public Housing Operating - Board
May, 2020

	Current Period	Current Year	Year To Date Budget	Variance
Income				
100-000-3110.000 Dwelling Rental	-16,183.00	-32,888.00	-33,015.00	127.00
100-000-3120.000 Excess Utilities	0.00	0.00	-91.66	91.66
100-000-3401.000 Operating Subsidy	-6,664.00	-16,245.00	-15,000.00	-1,245.00
100-000-3402.000 Capital Fund Revenue	0.00	-17,918.56	-10,000.00	-7,918.56
100-000-3610.000 Interest Revenue	0.03	1.09	0.00	1.09
100-000-3690.000 Other Income	-5.60	-5.60	-1,165.00	1,159.40
100-000-3691.000 Other Tenant Revenue	-478.50	-478.50	-2,033.34	1,554.84
100-000-3695.000 Laundry Revenue	-214.75	-352.75	-380.00	27.25
Total Income	-23,545.82	-67,887.32	-61,685.00	-6,202.32
Expense				
100-000-4110.000 Administration Salaries	1,448.32	2,844.48	3,138.34	-293.86
100-000-4130.000 Legal	0.00	0.00	375.00	-375.00
100-000-4140.000 Staff Training	0.00	0.00	66.66	-66.66
100-000-4150.000 Travel	0.00	0.00	131.66	-131.66
100-000-4190.000 Sundry-Other Admin	12.50	27.50	58.34	-30.84
100-000-4191.000 Management Fees	3,000.00	6,000.00	6,000.00	0.00
100-000-4194.000 Office Supplies	46.87	75.36	150.00	-74.64
100-000-4195.000 Membership Dues	0.00	0.00	51.66	-51.66
100-000-4196.000 Telephone	57.38	114.98	120.00	-5.02
100-000-4198.000 Advertising	0.00	0.00	80.84	-80.84
100-000-4199.000 Postage	0.00	392.50	47.50	345.00
100-000-4210.000 Tenant Svcs Salaries	313.04	606.30	720.00	-113.70
100-000-4230.000 Tenant Services Other	16.17	32.34	216.66	-184.32
100-000-4310.000 Water	1,245.60	1,245.60	2,480.84	-1,235.24
100-000-4315.000 Sewer	1,896.53	1,896.53	3,650.84	-1,754.31
100-000-4320.000 Electricity	0.00	0.00	3,534.16	-3,534.16
100-000-4330.000 Gas	0.00	0.00	2,014.16	-2,014.16
100-000-4431.000 Garbage & Trash	594.45	594.45	1,400.00	-805.55
100-000-4410.000 Maintenance Labor	3,229.01	6,413.81	7,011.66	-597.85
100-000-4420.000 Materials	335.11	497.31	2,166.66	-1,669.35
100-000-4430.000 Contracts Costs	576.74	789.21	2,833.34	-2,044.13
100-000-4432.000 Decorating Contract	23.98	23.98	1,500.00	-1,476.02
100-000-4435.000 Grounds Contract	19.49	19.49	166.66	-147.17
100-000-4445.000 Elevator Maintenance	2,454.00	2,454.00	583.34	1,870.66
100-000-4450.000 Plumbing/Heating	482.50	482.50	833.34	-350.84
100-000-4455.000 Snow Removal	0.00	0.00	400.00	-400.00
100-000-4456.000 Exterminating	22.00	22.00	206.66	-184.66
100-000-4457.000 Janitor/Cleaning	613.58	1,075.58	1,133.34	-57.76
100-000-4510.000 Insurance	1,856.66	3,713.32	3,396.68	316.64
100-000-4520.000 Property Tax	813.91	1,576.01	1,164.16	411.85
100-000-4540.000 Employee Benefits	2,326.44	4,548.02	5,441.66	-893.64
Total Expense	21,384.28	35,445.27	51,074.16	-15,628.89
Net Income(-) or Loss	-2,161.54	-32,442.05	-10,610.84	-21,831.21

Crosby HRA
Edgewood Operating Stmt - Board
May, 2020

	Current Period	Current Year	Year To Date Budget	Variance
Income				
700-000-3110.000 Dwelling Rental	-19,121.00	-38,583.00	-38,107.50	-475.50
700-000-3120.000 Excess Utilities	-20.00	-40.00	-320.00	280.00
700-000-3404.000 Other Government Grant	-8,685.00	-16,580.00	-17,120.84	540.84
700-000-3610.000 Interest Revenue	13.45	-2,992.28	-5,300.00	2,307.72
700-000-3690.000 Other Income	-5.60	-505.60	-36.66	-468.94
700-000-3691.000 Other Tenant Revenue	-15.00	-30.00	-1,088.34	1,058.34
700-000-3695.000 Laundry Revenue	-1,030.50	-1,349.75	-1,324.16	-25.59
Total Income	-28,863.65	-60,080.63	-63,297.50	3,216.87
Expense				
700-000-4110.000 Administration Salaries	2,372.48	4,816.72	5,165.00	-348.28
700-000-4130.000 Legal	0.00	0.00	375.00	-375.00
700-000-4140.000 Staff Training	0.00	0.00	100.00	-100.00
700-000-4150.000 Travel	0.00	0.00	125.00	-125.00
700-000-4190.000 Sundry-Other Admin	12.50	31.50	46.66	-15.16
700-000-4191.000 Management Fees	4,500.00	9,000.00	9,000.00	0.00
700-000-4194.000 Office Supplies	46.87	75.37	150.00	-74.63
700-000-4195.000 Membership Dues	0.00	0.00	51.66	-51.66
700-000-4196.000 Telephone	57.39	115.01	120.00	-4.99
700-000-4198.000 Advertising	0.00	0.00	66.66	-66.66
700-000-4199.000 Postage	0.00	392.50	46.66	345.84
700-000-4210.000 Tenant Svcs Salaries	469.54	909.42	1,080.00	-170.58
700-000-4230.000 Tenant Services Other	16.18	32.35	33.34	-0.99
700-000-4310.000 Water	470.68	470.68	1,199.16	-728.48
700-000-4315.000 Sewer	803.62	803.62	1,985.00	-1,181.38
700-000-4320.000 Electricity	0.00	0.00	4,610.00	-4,610.00
700-000-4330.000 Gas	0.00	0.00	2,066.66	-2,066.66
700-000-4431.000 Garbage & Trash	168.65	168.65	366.66	-198.01
700-000-4410.000 Maintenance Labor	3,319.69	6,595.19	7,215.00	-619.81
700-000-4420.000 Materials	341.92	585.22	1,666.66	-1,081.44
700-000-4430.000 Contracts Costs	971.77	1,292.16	2,166.66	-874.50
700-000-4432.000 Decorating Contract	35.98	35.98	1,833.34	-1,797.36
700-000-4435.000 Grounds Contract	19.50	19.50	100.00	-80.50
700-000-4445.000 Elevator Maintenance	2,454.00	2,454.00	583.34	1,870.66
700-000-4450.000 Plumbing/Heating	85.00	85.00	2,000.00	-1,915.00
700-000-4455.000 Snow Removal	0.00	0.00	583.34	-583.34
700-000-4456.000 Exterminating	33.00	33.00	250.00	-217.00
700-000-4457.000 Janitor/Cleaning	796.46	1,489.46	1,366.66	122.80
700-000-4510.000 Insurance	1,509.16	3,018.32	3,795.02	-776.70
700-000-4520.000 Property Tax	838.02	1,710.16	1,412.50	297.66
700-000-4540.000 Employee Benefits	2,582.20	5,066.05	6,296.68	-1,230.63
Total Expense	21,904.61	39,199.86	55,856.66	-16,656.80
Net Income(-) or Loss	-6,959.04	-20,880.77	-7,440.84	-13,439.93

Housing and Redevelopment Authority of Crosby
Payment Summary Report
May 2020

Payment Date	Payment Number	Remit to Vendor	Total Check Amt
5/7/2020	1370	Lincoln Financial Group	\$748.97
5/7/2020	1371	Electronic Federal Tax Payment System	\$1,129.04
5/7/2020	1372	Minnesota Dept Of Revenue	\$128.70
5/21/2020	1373	Lincoln Financial Group	\$748.97
5/21/2020	1374	Void	\$0.00
5/21/2020	1375	Minnesota Dept Of Revenue	\$128.70
5/21/2020	1376	Electronic Federal Tax Payment System	\$1,164.02
5/21/2020	1377	Electronic Federal Tax Payment System	\$30.62
5/7/2020	117687	Adams Pest Control	\$55.00
5/7/2020	117688	Bremer Bank Credit Card	\$18.00
5/7/2020	117689	City Of Crosby	\$4,868.44
5/7/2020	117690	Climate Makers	\$355.00
5/7/2020	117691	Crosby Ace Hardware	\$226.22
5/7/2020	117692	Crow Wing County San. Landfill	\$100.00
5/7/2020	117693	Crow Wing County Treasurer	\$7,613.59
5/7/2020	117694	Ctcit	\$200.00
5/7/2020	117695	HDS, Inc.	\$120.00
5/7/2020	117696	Hd Supply Facilities Maint	\$113.38
5/7/2020	117697	Healthpartners	\$3,649.72
5/7/2020	117698	Holden Electric Co. Inc.	\$5,360.75
5/7/2020	117699	Minnesota Energy Resources	\$1,905.94
5/7/2020	117700	Minnesota Power	\$26.00
5/7/2020	117701	Minnesota Power	\$70.00
5/7/2020	117702	Nisswa Sanitation Inc	\$226.09
5/7/2020	117703	Tenant Refund	\$203.98
5/7/2020	117704	Rental History Reports	\$25.00
5/7/2020	117705	Terry Quick	\$61.53
5/7/2020	117706	The Office Shop	\$93.74
5/7/2020	117707	Tkda	\$1,049.63
5/7/2020	117708	Visa--Unity	\$224.61
5/21/2020	117709	Ctc	\$362.91
5/21/2020	117710	Gravelle Plumbing & Heating	\$212.50
5/21/2020	117711	Hd Supply Facilities Maint	\$134.18
5/21/2020	117712	Jack Pine Brewery	\$25.00
5/21/2020	117713	Judy Robinson	\$1,200.00
5/21/2020	117714	Mei Elevator Solutions	\$4,908.00
5/21/2020	117715	Northland Fire Protection	\$191.00
5/21/2020	117716	ShofCorp LLC	\$75.48
5/21/2020	117717	Tkda	\$1,097.51
5/21/2020	117718	Verizon Wireless	\$130.96
5/21/2020	117719	Visa--Unity	\$247.63

**Housing and Redevelopment Authority of Crosby
Payment Summary Report
May 2020**

Payment Date	Payment Number	Remit to Vendor	Total Check Amt
		Report Total	\$39,230.81



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Crosby, MN 56441-1642

PHONE (218) 546-5088
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To: Crosby HRA Board Members
From: Shannon Fortune, Housing Manager
Date: June 3, 2020
Re: Housing Manager Report

Ongoing COVID-19 Response

Work orders are still being considered on a case-by-case/priority basis, additional cleaning and sanitizing tasks have continued, common areas still remain closed, tenant activities and gatherings are still cancelled. Move-ins have continued using an extremely limited contact model, as have interim and annual recertifications. To help with maintaining social distance once the office reopens to the public, a video intercom system is being investigated. Masks were purchased for all residents using the additional CARES funding and were distributed this week.

Annual Management & Occupancy Review (MOR)

We had been notified by MN Housing in April that our annual MOR would be conducted on Jun-10th. In mid-May there was concern about the potential to spread the COVID-19 virus during on-site visits and the possibility of transitioning to an “e-review” model was discussed, with some information being provided on a secure document sharing platform that could facilitate that process. Just this past week, we received new communication from MN Housing indicating that an on-site review was still a possibility, maybe even later in June but that it was definitely not happening on June 10th. MN Housing is awaiting guidance from HUD on how they should proceed with monitoring visits and will let us know once they settled on a plan. As a reminder, the MOR is an in-depth review of tenant files, operating procedures, and administrative policies along with a physical inspection component, and occurs annually.

Dellwood POHP Project Update

After taking some time in response to COVID-19 precautions, Baratto is ready to begin the next phase of the POHP project, which includes closet, bedroom and bathroom doors on 2nd & 3rd floors, air conditioner sleeves on all three floors, and replacing some fire panels and common entry doors. Staff conducted a phone poll of all Dellwood tenants to assess the comfort level of proceeding with the work. Baratto will be monitoring their employees for symptoms and exposure, requiring personal protective equipment, and doing what they can to minimize time spent in units. This, combined with the masks provided to residents and the additional cleaning and sanitizing being done in the building, supports our goal of taking all possible precautions to our tenants and staff during this project. The work is expected to begin some time in the next two weeks.

Monthly Property Performance Report for May 2020

Please see attachment 3a.

No Action Requested; Discussion Items

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Crosby Housing and Redevelopment Authority

Monthly Property Performance Report

May 2020

1. Property Narrative

2. Physical Occupancy

Unit Size	Total Units	Occupied Units	Mod Rehab	Make Ready	Vacant Units	Percent Occupied
Edgewood	61	60	n/a	n/a	1	98%
Dellwood	39	39	n/a	n/a	0	100%
Family Units	20	20	n/a	n/a	0	100%
TOTAL	120	119	0	0	1	99%

3. Customer Traffic

Applications Requested	4
Applications Placed on PH Wait List	1
Applications Denied on PH Wait List	1

4. Waiting List

Unit Size	# of Units	Total # on Wait List	Notified	Screening	Denied
1 bdrm	99	47	5	1	0
2 bdrm	13	13	0	0	0
3 bdrm	6	8	0	0	0
4 bdrm	2	2	0	0	0
TOTAL	120	70	5	1	0

5. Move-Ins and Move Outs

	This Month	Year-to-Date*
Move-Ins	0	1
Move-Outs	1	2

*Starting 4/1/2020

6. Lists of Vacant Units and Unit Status

Unit	Unit Size	Anticipated Lease Date	Applicant Approved?
EW #213	1BR	6/15/2020	In Process

7. Recertifications

Interim Recertifications	22
Annual Recertifications	11
Completed for this month	33

8. Annual Unit Inspections

Total units to be inspected this year*	120
Number completed start of month	0
Number inspected for the month	0
Number completed year-to-date	0
Total left to be inspected this year	120
Have all building system inspections been completed?	In Process
If yes, please enter date	n/a

**Starting 4/1/2020*

9. Lease Enforcements

Lease warnings/violations issued	1
30-day lease terminations	0

10. Evictions

Resident	Reason	Summons Date	Judgment Action
None			

11. Non-Emergency Work Orders

Beginning Balance	0
Received	26
Closed	23
Ending Balance	3
Total Completed Work Orders for Year*	32

**Starting 4/1/2020*

12. Emergency Work Orders

	This Month	Year-to-Date
Requested	1	6
Completed within 24 hours	1	6
Percent completed within 24 hours	100%	100%

13. Rent Collection

	This Month
Rent Charges	36,131
Other Charges	184
Total New Charges	36,315
Arrears, tenants in possession	542

Accounts Receivable

Current Tenant Accounts Receivable (Rent)	(196)
Current Rent Charges	36,131
Current Rent Collections	36,327
Accounts Receivable Rate	-1%
Collection Rate	101%

Collections - Prior 12 Month Period

Prior Tenants Accounts Receivable (Rent)	1,421
Prior Rent Charges	433,232
Collection Rate	100%

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300 Third Avenue NE
Crosby, MN 56441-1642

PHONE (218) 546-5088
FAX (218) 546-5041
www.crosbyhra.org

To: Crosby HRA Board Members
From: Shannon Fortune, Housing Manager
Date: June 2, 2020
Re: Updated Policy Approval

There are three (3) policies before the Board for approval this month.

- » **Access to Public Records Policy - Resolution No. 2021-05** (*Attachment 4a*)
The Crosby HRA, along with all governmental entities, must comply with the Minnesota Government Data Practices Act (MGDPA), Minnesota Statutes, Chapter 13. This act creates a presumption that state and local government records are accessible to the public, unless a statute or rule provides otherwise. The policy defines accessibility of records and the process to see (inspect) or obtain copies of government data maintained by the Crosby HRA.
- » **EIV Security Policy - Resolution No. 2021-06** (*Attachment 4b*)
The purpose of the EIV policy is to provide instruction and information to staff, auditors, and tenants on the acceptable use, disposition and storage of data obtained through HUD - EIV (Enterprise Income Verification) System.
- » **Record Retention Policy - Resolution No. 2021-07** (*Attachment 4c*)
Upon policy research, it was determined that we should set in place a record retention policy that outlines the agency's policy to retain and/or dispose of records; complies with all local, state, and federal laws; and is consistent with HUD's prescribed retention schedules.

Action Requested:

Approve Resolution No. 2021-05 adopting the Access to Public Records Policy.

Approve Resolution No. 2021-06 adopting the EIV Security Policy.

Approve Resolution No. 2021-07 adopting the Record Retention Policy.

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**CROSBY HOUSING AND REDEVELOPMENT AUTHORITY
ACCESS TO PUBLIC RECORDS POLICY**

Adopted: Resolution No. 2021-05

I. PUBLIC RECORDS

The Minnesota Government Data Practices Act (MGDPA), Minnesota Statutes, Chapter 13, creates a presumption that state and local government records are accessible to the public, unless a statute or rule provides otherwise. The Crosby HRA, along with all governmental entities, must comply with this act. The MGDPA regulates the management of government data, which is defined as “all data collected, created, received, maintained, or disseminated” by a covered governmental entity “regardless of physical form, storage media, or conditions of use.”

- A. **Data Classifications:** The types of data regulated by the MGDPA are not limited to paper files, but include computerized files, e-mails, photographs, charts, maps, videotapes, audio tapes - even handwritten notes and working documents.

Type of Data	Subject of Data (individual or entity)	Who Has Access (to whom data are available now)
General Rule	Individual, business, or other entity	Public
Private	Individual	Data subjects
Confidential	Individual Government	Entity only
Nonpublic	Business or other entity	Business or entity that is the subject of the data
Protected Nonpublic	Business or other entity	Government entity only

Data governed by state law that are classified as something other than public are classified in one of the following ways:

- Private: data identifying an individual that are only available to the individual or with the individual’s consent (Minn. Stat. § 13.02, subd. 12)
- Confidential: data identifying an individual that are not available to anyone outside the entity holding the data, including the individual (Minn. Stat. § 13.02, subd. 3)
- Nonpublic: data on a business or other entity that are only available to the subject of the data or with the subject’s consent (Minn. Stat. § 13.02, subd. 9)
- Protected Nonpublic: data on a business or other entity that are not available to the subject of the data or anyone else outside the entity holding the data (Minn. Stat. § 13.02, subd. 13)

II. OBTAINING RECORDS

Any person may request access to data under the MGDPA (Minn. Stat. § 13.03, subd. 3(a)). There is no limitation based on the status of the requestor. The MGDPA does not require a stated purpose when requesting the records nor does it restrict in any way the use of government data by the requester. However, if a person requests access to data that has commercial value and was developed with a

significant expenditure of public funds, the government may charge a fee. Subdivision 3 clearly anticipates a commercial use of such valuable information.

A. Requests to Access Records

- a) **Form of Request:** There is not a requirement for how requests to access records/data are to be made. Requests may be made orally or in writing with no particular format.
- b) **Response:** It is the HRA's duty to respond to requests for records and provide the specific statutory authority when access is denied. The HRA generally may not require requestors to identify themselves, state a reason for a request, or otherwise justify a request for public data. They may, however, request information to confirm that an individual requesting private data is in fact the subject of the data (or the authorized representative). If the data does not exist, the requestor will be informed of this fact. Before responding, the HRA will determine what data is requested, what data exists, if the requestor is the subject of the data, and how the data is classified.
- c) **Inspection, Copies, Costs:** An "inspection" is typically (but is not limited to) a visual inspection of paper or similar types of government data. Inspections do not require printing copies, unless printing a copy is the only way to provide access. When a person requests to inspect government data, the HRA must provide access (pursuant to the applicable classifications of the MGDPA as previously listed) at no cost to the requestor. If a person requests copies of the data, the HRA must provide copies, but may charge for the copies provided (see below). The amount the responsible authority may charge for copies of data will vary, depending on the nature of the request, as well as who is requesting the data.
 - i) **Requestor is Not the Subject of the Data:** If 100 or fewer pages of black and white, letter or legal size paper copies are requested, the responsible authority may charge no more than 25 cents for each page copied, or 50 cents for each two-sided copy. The HRA may not charge any more than this amount for black and white copies, regardless of the actual cost to respond to the request.

Actual Costs

For any other request for copies of data (such as for more than 100 black and white paper copies, color copies, photographs, or audio/video cassettes or discs), the HRA may require the requestor to pay the actual costs of searching for and retrieving government data, including the cost of employee time, and for making, certifying, compiling, or electronically transmitting the copies of the data. The HRA may not charge for costs related to separating public from not-public data.

Actual costs may include staff time required to retrieve, sort, and label documents (if necessary to identify what is to be copied), to remove staples or paper clips, to take documents to the copier for copying, and to copy documents. Staff time must be calculated at the wages or salary (and benefits) level of the lowest-paid employee who could have prepared the documents or made the copies.

Actual costs can include materials, such as paper, ink/toner, staples, audio or videotapes, CDs, etc., as well as any special costs that could occur when copying computerized data,

such as creating or modifying a computer program when necessary to format the data. Actual costs may also include mailing costs and vehicle costs that occur if the HRA has to transport the data to another facility in order to provide copies.

When someone inspects data, but only requests copies of some of that data, the HRA may only charge for the number of pages actually copied. Under these circumstances, if the request is for 100 or fewer pages, the HRA may charge no more than 25 cents per page actually copied. If more than 100 pages are copied, then the HRA may charge actual costs, but only for the portion of the inspected documents that were copied, not the total amount incurred responding to the initial request to inspect.

Commercial Value

The Crosby HRA may impose an additional “reasonable” fee for copies of public government data that has commercial value or is a substantial and discrete portion of—or an entire—formula, pattern, compilation, program, device, method, technique, process, database, or system developed with a significant expenditure of HRA funds. Any such fee charged must be clearly demonstrated by the HRA to relate to the actual development costs of the information. The HRA, upon the request of any person, must provide sufficient documentation to explain and justify the fee being charged.

Electronic Format

If the HRA maintains data in a computer storage medium, copies of any public data contained in that medium, will be provided in electronic form. This does not require the HRA to provide the data in an electronic format or program that is different from the format or program in which the data is maintained.

Response Time

When possible, copies should be provided at the time a request is made. If the HRA is not able to provide copies at that time, copies shall be supplied as soon as reasonably possible.

ii) **Requestor is the Subject of the Data**

When the data subject makes the request, somewhat different rules apply. The requestor must be allowed to inspect data (public or private) without any charge.

If the requestor wants copies, then the HRA may require the requestor to pay the actual costs of making, certifying, and compiling the copies.

Unlike for requests made by the public, actual costs also apply to requests for 100 or fewer pages of black and white, legal or letter size copies.

The HRA must respond to a request from the data subject immediately, if possible, or within 10 days of the request (excluding Saturdays, Sundays, and legal holidays) when an immediate response is not possible.

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HOUSING AND REDEVELOPMENT AUTHORITY IN AND FOR
THE CITY OF CROSBY
RESOLUTION NO. 2021-05

ACCESS TO PUBLIC RECORDS POLICY

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby is required to have in place a Access to Public Records Policy in compliance with all local, state and federal laws; and

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby has reviewed and updated its previously established Information Request Policy; and

NOW, THEREFORE BE IT RESOLVED by the Board of Commissioners of the PHA as follows:

1. The Access to Public Records Policy is hereby approved.

I CERTIFY THAT the above resolution was adopted by the Housing and Redevelopment Authority in and for the City of Crosby.

Dated: _____
Linda Peebles, Chair

Dated: _____
Karen Young, Interim Executive Director

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**CROSBY HOUSING AND REDEVELOPMENT AUTHORITY
EIV SECURITY POLICY & PROCEDURES**

Adopted: Resolution No.: 2021-06

PURPOSE

The purpose of this policy is to provide instruction and information to staff, auditors, and tenants of the Crosby Housing and Redevelopment Authority (hereinafter, “the Agency”) on the acceptable use, disposition, and storage of data obtained through HUD - EIV (Enterprise Income Verification) System.

The purpose of EIV is to assist HUD and the Agency in streamlining the income verification process and to help in minimizing the need for third party verification. EIV allows the user to identify:

- Applicants currently receiving HUD assistance
- Income not previously reported
- New employment
- Historical patterns of earnings and received income
- Multi-subsidy for household members included in both PIC and TRACS databases
- Deceased household member(s)

In addition, information in EIV can be used to provide more comprehensive oversight to compliance policies and their implementation. The data provided via the EIV system will be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data. Privacy of data and data security for computer systems are covered by a variety of federal laws and regulations, government bulletins, and other guiding documents.

SAFEGUARDING EIV DATA

The information processed by the EIV system can include wage and income data about private individuals, as well as identifying information such as Social Security Number, address, and employment information. This policy describes methods to comply with HUD’s required EIV safeguards.

Technical Safeguards

1. Reduce the risk of a security violation related to the EIV system's software, network, or applications.
2. Identify and authenticate all users seeking to use the EIV system data.
3. Deter and detect attempts to access the system without authorization.
4. Monitor the user activity on the EIV system.

Administrative Safeguards

1. Ensure that access rights, roles, and responsibilities are appropriately and adequately assigned.
2. Protect copies of sensitive data and destroy system-related records to prevent reconstruction of the contents.
3. Ensure authorized release of tenant information consent forms are included in all family files, before accessing and using data.
4. Maintain, communicate, and enforce standard operating procedures related to securing EIV data.
5. Train staff on security measures and awareness, preventing the unauthorized accessibility and use of data.

Physical Safeguards

1. Establish barriers between unauthorized persons and documents or computer media containing private data.
2. Clearly identify restricted areas by use of prominently posted signs or other indicators.
3. Develop a list of authorized users who can access restricted areas-e.g., contractors, maintenance, and janitorial/cleaning staff.
4. Prevent undetected entry into protected areas and/or documents.
5. Notify coordinators/security administrators of system breaches and penetration by unauthorized users.

The housing manager will have the responsibility of ensuring compliance with the security policies and procedures outlined in this document. These responsibilities include:

- Maintaining and enforcing the security procedures.
- Keeping records and monitoring security issues.
- Communicating security information and requirements to appropriate personnel including coordinating and conducting security awareness training sessions.
- Conducting review of all User IDs issued to determine if the users still have a valid need to access EIV data and taking necessary steps to ensure that access rights are revoked or modified as appropriate.
- Reporting any evidence of unauthorized access or known security breaches and taking immediate action to address the impact of the breach including but not limited to prompt notification to HUD. The housing manager will escalate the incident by reporting to appropriate parties or HUD.

Limiting Access to EIV Data

User accounts for the EIV system will be provided on a need-to-know basis, with appropriate approval and authorization by the executive director.

Security Awareness Training

Security awareness training is a crucial aspect of ensuring the security of the EIV system and data. Users and potential users will be made aware of the importance of respecting the privacy of data, following established procedures to maintain privacy and security, and notifying management in the event of a security or privacy violation. Before granting access to the EIV information, each person must be trained in EIV Security policies and procedures. Additionally, all employees having access to EIV data will be briefed at least annually on the security policy and procedures that require their awareness and compliance. Information about user access and training will be maintained in the HRA EIV file.

EIV System Coordinator

The housing manager will act as the EIV Coordinator.

EIV Users

Before requesting EIV user access, appropriate staff will review the EIV training material provided by HUD and complete the appropriate Security Awareness Training Questionnaire and review the EIV Security Policy and the EIV User Policy. Upon completion of these three tasks, the EIV User will submit to the EIV Coordinator the appropriate User Access Authorization Form. Upon receipt, the EIV

coordinator will review the completed Security Awareness Training Questionnaire for accuracy and recommend further training if necessary. If the EIV coordinator feels that the EIV user candidate does not understand the security requirements, the EIV coordinator will not continue with the EIV setup for that user.

Note: Under no circumstances will the EIV Coordinator process the User Access Authorization Form unless the executed Security Awareness Training Questionnaire, the signed EIV Security Policy and the signed EIV User Policy are attached.

Once the user request information is satisfactorily completed, the EIV Coordinator will complete the appropriate steps to provide EIV access to the user. In accordance with HUD requirements, the user's need for access will be reviewed on a quarterly basis.

At least once a year, staff with EIV access will be required to:

- Participate in training that includes a review of the EIV security policy; and
- Complete the EIV Security Awareness Training Questionnaire

The Agency will restrict access to EIV data only to persons whose duties or responsibilities require access. EIV coordinators will be required to request re-certification on an annual basis. EIV coordinators are authorized to provide access only to those individuals directly involved in the resident certification process and/or compliance monitoring. EIV coordinators will carefully review initial and quarterly requests for access and certify only those users who will need access within the next 90 days.

The Agency will maintain a log of users who have approved access to EIV data. Further, the Agency will revoke (terminate) the access rights of those users who no longer require such access or modify the access rights if a change in the user's duties or responsibilities indicates a change in the current level of privilege.

The HUD 9887 Fact Sheet will be provided to all adult household members required to sign the form. By signing this HUD Form 9887 and HUD Form 9887-A, the applicant/resident authorizes HUD and/or the owner/agent to obtain and verify income and unemployment compensation information from various sources including, but not limited to, the IRS, the Department of Health and Human Services, the Social Security Administration, and current and former employers and state agencies.

Username, Passwords, and Password Changes

Many systems require frequent changes in passwords. Secure Systems/ EIV passwords will be changed in accordance with HUD Secure Systems requirements. Users will not share usernames or passwords with any other employee or with anyone outside the organization. EIV access granted to an employee or authorized user will be revoked when access is no longer required or prior to termination of that employee or user to ensure data safety. Termination of EIV access and un-assigning property access through "Property Assignment Maintenance" is required.

The EIV file will be documented to indicate when user access was terminated by the EIV coordinator. Documentation of termination will be maintained in the Crosby HRA EIV file and in the employee's personnel file.

Computer System Security Requirements

All computer systems and computers will have password-restricted access. The Agency will also use antivirus software to limit data destruction or unintended transmission via virus, worms, Trojan horses, or other malicious means. Remote access by other computers other than those specifically authorized is prohibited.

Authorized users of EIV data are directed to avoid leaving EIV data displayed on their computer screens where unauthorized users may view it. A computer will not be left unattended while the user is “logged in” to Secure Systems. If an authorized user is viewing EIV data and an unauthorized user approaches the work area, the authorized user will lessen the chance of inadvertent disclosure of EIV data by minimizing or closing out the screen on which the EIV data is being displayed.

Physical Security Requirements

Storage - EIV data shall be kept in filing cabinet(s), and only those staff members who have been previously authorized by the housing manager may be given access to the data. The housing manager shall maintain a list of users having access. The filing cabinet(s) shall in turn be secured behind a door locked whenever the office is closed.

Printouts - Users will retrieve computer printouts as soon as they are generated so that EIV data is not left unattended in printers or fax machines where unauthorized users may access them. EIV data will be handled in such a manner that it does not become misplaced or available to unauthorized personnel.

EIV printouts will be stored in the resident file and be made available to authorized people including appropriate staff, HUD staff, financial auditors, and the Office of the Inspector General (OIG).

If a resident requests a copy of their own EIV printout, a copy will be produced. The staff person providing the copy will note that the printout is a copy provided to the resident upon request. This note will include the following:

- This is not an original, this is a copy provided to: _____
- On _____, 20_____
- By _____ (name will be printed)
- Initials _____

The appropriate staff will make a note in the file any time a copy of the EIV data is obtained by authorized persons and taken off site. This includes copies provided to the applicant/resident, other internal staff, HUD, or OIG staff. Under no circumstances will the EIV information be provided to anyone other than those noted in this paragraph.

Electronic Information from EIV - Under no circumstances should anyone save or scan EIV information to retain an electronic copy. In order to ensure compliance with HUD’s security requirements, EIV information should only be produced in hard copy and maintained in accordance with the recordkeeping requirements outlined by HUD.

Disposal of EIV Information - EIV data will be destroyed in a timely manner based on the information provided in HUD's published EIV training materials, HUD notices, or as prescribed by the Crosby HRA's policy and procedures. The Crosby HRA's policy and procedures will not allow data retention that is longer than the time allowed in the published HUD materials.

As necessary, all EIV originals will be shredded on-site. Information about use of EIV information and how printouts were destroyed will be maintained in the resident file.

Disclosure, Data Security, and Disposition

EIV users and Crosby HRA staff shall document that the Crosby HRA will make use of EIV systems at each annual and interim recertification and to applicants during the application process. This disclosure shall include the following:

- a. Brief explanation of the EIV system.
- b. Brief explanation of how income discrepancies are identified, the potential effect on rental calculations, and penalties for committing fraud.
- c. Brief explanation of how discrepancies are resolved.
- d. Brief explanation of the actions the Crosby HRA may take based on verified unreported or underreported income.

Each tenant and applicant file shall contain a properly completed, active HUD 9886 Form, granting the Crosby HRA access to EIV data.

Discrepancies

All household income regardless of source must be reported by the family to the Agency in accordance with HUD regulation and the Crosby HRA Occupancy Policy and Dwelling Lease. The Occupancy Policy and Dwelling Lease are therefore included in this document by reference.

Where EIV data is substantially different from tenant-reported and/or third party-reported income, the following action will be taken:

1. In any case where staff has relied solely on EIV data to document the discrepant income, staff shall submit a third-party verification form to the income source.
2. Staff shall review historical data for prior patterns of employment, benefit payments, and/or other income source histories.
3. Staff shall discuss the discrepancy with the tenant and the tenant shall be given the opportunity to resolve the discrepancy. Such discussion shall either be verbally or in writing.
 - a. Although the tenant shall be given the opportunity to resolve the discrepancy, the final arbiter shall be either third-party verification or EIV data, whichever is accurate, unless the tenant can provide documentation that one or both parties' data is incorrect.
 - b. If the tenant is able to produce sufficient documentation of incorrect third-party and/or EIV data, staff shall use the data proven to be accurate.

Reporting Improper Disclosures

Recognition, reporting, and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system. These security violations may include the disclosure of private data as well as attempts to access unauthorized data and sharing of User ID's and passwords. Upon the discovery of a possible improper disclosure of EIV information or

other security violation by an employee or any other person, the individual making the observation or receiving the information will contact the EIV coordinator immediately who will document all improper disclosures in writing providing details including who was involved, what was disclosed, how the disclosure occurred, and where and when it occurred. The EIV coordinator will immediately review the report of improper disclosure and, if appropriate, the EIV coordinator will remove EIV access.

Improper disclosure of any information is grounds for immediate termination. All employees should carefully review the EIV Access Authorization Form to understand the penalties for improper disclosure of EIV data.

Disposal of EIV Information

EIV data will be destroyed in a timely manner based on the information provided in HUD's published EIV training materials, HUD notices or as prescribed by the owner/agent's policy and procedures. The owner/agent's policy and procedures will not allow data retention that is longer than the time allowed in the published HUD materials.

HOUSING AND REDEVELOPMENT AUTHORITY IN AND FOR
THE CITY OF CROSBY
RESOLUTION NO. 2021-06

EIV SECURITY POLICY AND PROCEDURES

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby is required to have in place an EIV Security Policy and Procedures in compliance with all local, state and federal laws; and

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby has reviewed and updated its previously established EIV Security Policy and Procedures; and

NOW, THEREFORE BE IT RESOLVED by the Board of Commissioners of the PHA as follows:

1. The EIV Security Policy and Procedures is hereby approved.

I CERTIFY THAT the above resolution was adopted by the Housing and Redevelopment Authority in and for the City of Crosby.

Dated: _____

Linda Peeples, Chair

Dated: _____

Karen Young, Interim Executive Director

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**CROSBY HOUSING AND REDEVELOPMENT AUTHORITY
RECORD RETENTION POLICY**

Adopted: Resolution No.: 2021-07

It is the policy of the Crosby Housing and Redevelopment Authority (hereinafter, “the Agency”) to retain and/or dispose of records in the manner described below and in compliance with all local, state, and federal laws, and consistent with HUD’s prescribed retention schedules. For documents not defined in the schedule below, the above referenced laws will be followed.

Records that have reached their termination should be destroyed in a manner consistent with the measures to protect data. Confidential records should be disposed of in a manner so as to assure no access to such information. Records may be retained longer than the suggested schedule but must be retained for at least the minimum time as listed. The listed retention periods do not override federal or state law, audit or litigation requirements or good judgement. At the discretion of the Agency, certain records may be retained indefinitely.

PERMANENT RECORDS
Articles of Incorporation and Bylaws
Board Meeting Minutes and Resolutions
Audit Reports
End of Year Financial Reports
Deeds, Mortgages and Bills of Sale
General Ledgers and Journals
Depreciation Schedules
Annual Operating Budgets
Bids and Specifications for Capital Improvements Awarded
3 YEARS
EIV Income Report (3 years from end of participation date) ¹
Tenant Files, Verifications, Rent Determinations, Leases ²
Real Property and Equipment Acquired with Federal Funds (3 years after disposition)
Community Development Block Grant (CDBG) (3 years after loan is closed)
7 YEARS
Bank Statements, Reconciliation, Credit Card Statements and Canceled Checks
Accounts Payable and Receivable Documents
Monthly Financial Reports and Statements
Employee Files (Position Descriptions, Personnel Actions, Payroll Records)
Employment Tax Records
Application and Wait List Documents
All Documents Related to Financial Management and Activities Funded under Operating Fund ³
10 YEARS
Bids and Specifications for Services and Supplies Awarded (10 years after paid or terminated)
Community Development Block Grant (CDBG) Applications (10 years after federal audit)

**CROSBY HOUSING AND REDEVELOPMENT AUTHORITY
RECORD RETENTION POLICY**

Adopted: Resolution No.: 2021-07

Additional Guidance:

¹Notice PIH 2010-19(HA)

²CFR 982.158 Program Account and Records

³CFR 990.325 Record Retention Requirements

General Record Retention Schedule for MN Cities – May 2018 (Minnesota Clerks & Finance Officers Association) www.mcfoa.org

HOUSING AND REDEVELOPMENT AUTHORITY IN AND FOR
THE CITY OF CROSBY
RESOLUTION NO. 2021-07

RECORD RETENTION POLICY

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby is required to prepare a Record Retention Policy in compliance with all local, state and federal laws; and

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby has developed a Record Retention Policy; and

NOW, THEREFORE BE IT RESOLVED by the Board of Commissioners of the PHA as follows:

1. The Record Retention Policy is hereby approved.

I CERTIFY THAT the above resolution was adopted by the Housing and Redevelopment Authority in and for the City of Crosby.

Dated: _____
Linda Peoples, Chair

Dated: _____
Karen Young, Interim Executive Director

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