



300 Third Avenue NE
Crosby, MN 56441-1642

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Crosby HRA Board Meeting
11:00 a.m. May 12th, 2026
Community Room, 300 Third Avenue NE, Crosby MN 56441

AGENDA

1. CALL TO ORDER

2. ROLL CALL

3. REVIEW AND APPROVE AGENDA

4. OPEN FORUM

Time allocated for citizens and tenants to bring matters not on the agenda to the attention of the Crosby HRA board. If you are going to give a report or wish to speak, please state your full name and address. You will be restricted to 3 minutes, and no Board action will be taken.

5. REVIEW AND APPROVE MINUTES – Attachment 1 (pg.)

- a. Approval of Tuesday April 14th, 2026 Meeting Minutes

6. BILLS & COMMUNICATIONS

- a. Financial Report – Attachment 2 (pg.)
- b. Housing Manager Report – Attachment 3 (pg.)
- c. Maintenance Director Report – Attachment 4 (pg.)

7. RAB COMMITTEE UPDATE: (Resident Commissioner Lehnhoff)

8. UNFINISHED BUSINESS:

9. NEW BUSINESS:

- a. Updates to Employee Policy Manual – Attachment 5 (pg.)
- b. Updates to Tenant Selection Plan Policy – Attachment 6 (pg.)

c. Updates to the EIV Policy - Attachment 7 (pg.)

10. COMMISSIONER COMMENTS:

11. NEXT MEETING: June 9th, 2026

12. ADJOURNMENT

Donald Lehnhoff, Resident Commissioner Term Expires: 2026

Renae Marsh, Secretary/Treasurer Term Expires: 2030

Terri Larson, Commissioner Term Expires: 2027

Marsha Larson, Vice Chair Term Expires: 2029

Paula Traylor, Chair Term Expires: 2026

**All terms expire August 31st*



Crosby Housing & Redevelopment Authority

BOARD MEETING MINUTES

Wednesday, April 14, 2026

A regular meeting of the Board of Commissioners of the Housing and Redevelopment Authority (HRA) in and for the City of Crosby, Minnesota, was held in person in the Community Room, 300 Third Avenue NE, Crosby, MN, at 11:00 a.m. on Wednesday, April 14, 2026.

1. CALL TO ORDER

The meeting was called to order by Chair Paula Traylor at 11:00 a.m.

2. ROLL CALL

Roll call was conducted and a quorum was established.

Commissioners Present: Paula Traylor (Chair), Renae Marsh (Secretary/Treasurer), Marsha Larson (Vice Chair), Donald Lehnhoff (Resident Commissioner), and Terri Larson (Commissioner).

Staff Present: Eric Charpentier, Executive Director; John Schommer, Maintenance Director; and Diana Banks, Certified Housing Specialist.

3. REVIEW AND APPROVE AGENDA

The Board reviewed the meeting agenda.

Motion to approve the agenda was made by Donald Lehnhoff and seconded by Marsha Larson. Vote: All in favor. **Motion carried.**

4. OPEN FORUM

Time was allotted for citizens and tenants to address the Board. No public comments were offered. Began at 11:02 a.m. and Ended at 11:02 a.m.

5. REVIEW AND APPROVE MINUTES

The Board reviewed the March 10, 2026 meeting minutes.

Motion to approve the minutes was made by Marsha Larson and seconded by Terri Larson. Vote: All in favor. Motion carried.

6. BILLS & COMMUNICATIONS

a. Financial Report

The Financial Report for March 2026 was presented. Staff reviewed financial activity, ratios, and the payment summary. Staff noted that the March financials do not fully reflect year-end adjustments and remain subject to final audit entries. It was further reported that 2026 audit fieldwork has been scheduled with CliftonLarsonAllen during the week of June 22, 2026.

Motion to approve the March payments as presented was made by Donald Lehnhoff and seconded by Renae Marsh. Vote: All in favor. Motion carried.

b. Housing Manager Report

The Housing Manager Report was reviewed, including tenant activity, food shelf participation, and program updates. March highlights included 100% occupancy across all properties, three move-ins, no move-outs, and 140 work orders received. Staff reviewed current waiting list counts and tenant programming.

c. Maintenance Director Report

The Maintenance Director Report was reviewed. Updates included NSPIRE inspections at Edgewood and Public Housing. All 24-hour deficiencies have been mitigated and submitted. Remaining items include pending refrigerator gasket replacements. Staff also reviewed elevator service coordination and ongoing efforts with OMNIA Partners related to design and engineering services.

7. RAB COMMITTEE UPDATE

Resident Commissioner Donald Lehnhoff reported that no RAB meeting was held in March.

8. UNFINISHED BUSINESS

There was no unfinished business.

9. NEW BUSINESS

a. Updates to Employee Policy Manual – postponed.

10. COMMISSIONER COMMENTS

Commissioner comments included discussion of meeting space concerns and communication practices.

11. NEXT MEETING

The next regular meeting of the Crosby HRA Board is scheduled for May 12, 2026, at 11:00 a.m.

12. ADJOURNMENT

Motion to adjourn was made by Marsha Larson and seconded by Terri Larson. The meeting was adjourned at 11:49 a.m.

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To: Crosby HRA Board Members
From: Karen Young, Finance Director
Date: May 6, 2026
Re: May Financial Report

Please find attached the financial information for April 2026.

2026 Audit

The 2026 audit fieldwork has been scheduled with CliftonLarsonAllen (CLA) during the week of June 22nd.

2026 Capital Fund Program (CFP) Awards

HUD recently announced our 2026 Public Housing CFP funding award of \$154,898 which is an increase of \$3,333 from last year. This is at an all-time high and is primarily intended for capital improvements on our Public Housing properties.

Action Requested: Motion for approval of April payments as presented.

April 2026 Account Balances

Program/Account	Amount
Public Housing - Operating Checking	\$369,727.75
Public Housing - Security Deposit Savings	\$11,589.84
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	\$381,317.59
Edgewood - Operating Checking	\$50,747.61
Edgewood - Investment	\$874,478.29
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	\$925,225.90
Tenant Activity Fund	\$4,286.95

Crosby HRA
Operating Statement
One Month Ending 04/30/2026
Program: C- 100 - Public Housing Project: Dellwood & Family Units

	Period Amount	Period Budget	Period Variance	YTD Amount	YTD Budget	YTD Variance	Annual Budget	Remaining Budget
INCOME								
3110.000 Dwelling Rental	22,471.00	24,141.25	(1,670.25)	22,471.00	24,141.25	(1,670.25)	289,695.00	(267,224.00)
3120.000 Excess Utilities	15.00	97.92	(82.92)	15.00	97.92	(82.92)	1,175.00	(1,160.00)
3401.000 Operating Subsidy	0.00	8,189.58	(8,189.58)	0.00	8,189.58	(8,189.58)	98,275.00	(98,275.00)
3402.000 Capital Fund Revenue	839.94	1,666.67	(826.73)	839.94	1,666.67	(826.73)	20,000.00	(19,160.06)
3610.000 Interest Revenue	72.03	41.67	30.36	72.03	41.67	30.36	500.00	(427.97)
3690.000 Other Income	(370.35)	333.33	(703.68)	(370.35)	333.33	(703.68)	4,000.00	(4,370.35)
3691.000 Other Tenant Revenue	108.00	1,466.67	(1,358.67)	108.00	1,466.67	(1,358.67)	17,600.00	(17,492.00)
3695.000 Laundry Revenue	348.00	337.50	10.50	348.00	337.50	10.50	4,050.00	(3,702.00)
TOTAL INCOME	23,483.62	36,274.59	(12,790.97)	23,483.62	36,274.59	(12,790.97)	435,295.00	(411,811.38)
EXPENSES								
ADMINISTRATION								
4110.000 Admin Salaries	4,268.97	2,704.17	(1,564.80)	4,268.97	2,704.17	(1,564.80)	32,450.00	28,181.03
4130.000 Legal	0.00	343.33	343.33	0.00	343.33	343.33	4,120.00	4,120.00
4140.000 Staff Training	0.00	83.33	83.33	0.00	83.33	83.33	1,000.00	1,000.00
4150.000 Travel	0.00	60.42	60.42	0.00	60.42	60.42	725.00	725.00
4171.000 Auditing Fees	0.00	458.33	458.33	0.00	458.33	458.33	5,500.00	5,500.00
4190.000 Other Admin	7.50	20.83	13.33	7.50	20.83	13.33	250.00	242.50
4191.000 Management Fees	5,052.50	5,052.50	0.00	5,052.50	5,052.50	0.00	60,630.00	55,577.50
4194.000 Office Supplies	0.00	150.00	150.00	0.00	150.00	150.00	1,800.00	1,800.00
4195.000 Membership Dues	0.00	29.17	29.17	0.00	29.17	29.17	350.00	350.00
4196.000 Telephone	62.25	58.33	(3.92)	62.25	58.33	(3.92)	700.00	637.75
4198.000 Advertising	0.00	83.33	83.33	0.00	83.33	83.33	1,000.00	1,000.00
4199.000 Postage	0.00	45.83	45.83	0.00	45.83	45.83	550.00	550.00
TOTAL ADMINISTRATION	9,391.22	9,089.57	(301.65)	9,391.22	9,089.57	(301.65)	109,075.00	99,683.78
TENANT SERVICES								
4210.000 Tenant Svcs Salaries	0.00	524.17	524.17	0.00	524.17	524.17	6,290.00	6,290.00
4230.000 Tenant Svcs Other	8.76	108.33	99.57	8.76	108.33	99.57	1,300.00	1,291.24
TOTAL TENANT SERVICES	8.76	632.50	623.74	8.76	632.50	623.74	7,590.00	7,581.24
UTILITIES								
4310.000 Water	0.00	1,166.67	1,166.67	0.00	1,166.67	1,166.67	14,000.00	14,000.00
4315.000 Sewer	0.00	1,854.17	1,854.17	0.00	1,854.17	1,854.17	22,250.00	22,250.00
4320.000 Electricity	0.00	2,083.33	2,083.33	0.00	2,083.33	2,083.33	25,000.00	25,000.00
4330.000 Gas	(1,345.19)	1,083.33	2,428.52	(1,345.19)	1,083.33	2,428.52	13,000.00	14,345.19
TOTAL UTILITIES	(1,345.19)	6,187.50	7,532.69	(1,345.19)	6,187.50	7,532.69	74,250.00	75,595.19
MAINTENANCE								
4410.000 Maintenance Labor	6,601.17	4,260.42	(2,340.75)	6,601.17	4,260.42	(2,340.75)	51,125.00	44,523.83
4420.000 Materials	283.97	1,541.67	1,257.70	283.97	1,541.67	1,257.70	18,500.00	18,216.03
4430.000 Contracts Costs	134.19	2,508.33	2,374.14	134.19	2,508.33	2,374.14	30,100.00	29,965.81
4431.000 Garbage and Trash	0.00	875.00	875.00	0.00	875.00	875.00	10,500.00	10,500.00
4432.000 Decorating Contract	0.00	1,687.50	1,687.50	0.00	1,687.50	1,687.50	20,250.00	20,250.00
4435.000 Grounds Contract	0.00	350.00	350.00	0.00	350.00	350.00	4,200.00	4,200.00
4445.000 Elevator Maintenance	2,112.00	500.00	(1,612.00)	2,112.00	500.00	(1,612.00)	6,000.00	3,888.00
4450.000 Plumbing/Heating	0.00	750.00	750.00	0.00	750.00	750.00	9,000.00	9,000.00
4455.000 Snow Removal	0.00	416.67	416.67	0.00	416.67	416.67	5,000.00	5,000.00
4456.000 Exterminating	68.00	166.67	98.67	68.00	166.67	98.67	2,000.00	1,932.00
4457.000 Janitor/Cleaning	0.00	1,125.00	1,125.00	0.00	1,125.00	1,125.00	13,500.00	13,500.00

	Period Amount	Period Budget	Period Variance	YTD Amount	YTD Budget	YTD Variance	Annual Budget	Remaining Budget
EXPENSES								
TOTAL MAINTENANCE	9,199.33	14,181.26	4,981.93	9,199.33	14,181.26	4,981.93	170,175.00	160,975.67
OTHER								
4510.000 Insurance	2,804.81	3,072.92	268.11	2,804.81	3,072.92	268.11	36,875.00	34,070.19
4520.000 Property Taxes	1,382.04	1,087.50	(294.54)	1,382.04	1,087.50	(294.54)	13,050.00	11,667.96
4540.000 Employee Benefits	2,554.34	2,496.68	(57.66)	2,554.34	2,496.68	(57.66)	29,960.00	27,405.66
4570.000 Collection Losses	0.00	583.33	583.33	0.00	583.33	583.33	7,000.00	7,000.00
4583.001 Lease Interest Exp	8.97	0.83	(8.14)	8.97	0.83	(8.14)	10.00	1.03
4590.000 Other Gen Exp	0.00	416.67	416.67	0.00	416.67	416.67	5,000.00	5,000.00
4595.001 Lease Amort Exp	52.94	31.25	(21.69)	52.94	31.25	(21.69)	375.00	322.06
TOTAL OTHER	6,803.10	7,689.18	886.08	6,803.10	7,689.18	886.08	92,270.00	85,466.90
TOTAL EXPENSES	24,057.22	37,780.01	13,722.79	24,057.22	37,780.01	13,722.79	453,360.00	429,302.78
SURPLUS	(573.60)	(1,505.42)	931.82	(573.60)	(1,505.42)	931.82	(18,065.00)	17,491.40

Crosby HRA
Operating Statement
One Month Ending 04/30/2026
Program: C- 700 - HUD Multi-Family Project: Edgewood

	Period Amount	Period Budget	Period Variance	YTD Amount	YTD Budget	YTD Variance	Annual Budget	Remaining Budget
INCOME								
3110.000 Dwelling Rental	23,612.00	23,435.42	176.58	23,612.00	23,435.42	176.58	281,225.00	(257,613.00)
3120.000 Excess Utilities	40.00	169.17	(129.17)	40.00	169.17	(129.17)	2,030.00	(1,990.00)
3404.000 HAP Subsidy	11,393.00	11,722.08	(329.08)	11,393.00	11,722.08	(329.08)	140,665.00	(129,272.00)
3610.000 Interest Revenue	(4.06)	1,250.00	(1,254.06)	(4.06)	1,250.00	(1,254.06)	15,000.00	(15,004.06)
3690.000 Other Income	44.48	225.00	(180.52)	44.48	225.00	(180.52)	2,700.00	(2,655.52)
3691.000 Other Tenant Revenue	194.50	616.67	(422.17)	194.50	616.67	(422.17)	7,400.00	(7,205.50)
3695.000 Laundry Revenue	716.00	766.67	(50.67)	716.00	766.67	(50.67)	9,200.00	(8,484.00)
TOTAL INCOME	35,995.92	38,185.01	(2,189.09)	35,995.92	38,185.01	(2,189.09)	458,220.00	(422,224.08)
EXPENSES								
ADMINISTRATION								
4110.000 Admin Salaries	4,269.02	2,704.17	(1,564.85)	4,269.02	2,704.17	(1,564.85)	32,450.00	28,180.98
4130.000 Legal	0.00	250.00	250.00	0.00	250.00	250.00	3,000.00	3,000.00
4140.000 Staff Training	0.00	41.67	41.67	0.00	41.67	41.67	500.00	500.00
4150.000 Travel	0.00	62.50	62.50	0.00	62.50	62.50	750.00	750.00
4171.000 Auditing Fees	0.00	458.33	458.33	0.00	458.33	458.33	5,500.00	5,500.00
4190.000 Other Admin	7.50	20.83	13.33	7.50	20.83	13.33	250.00	242.50
4191.000 Management Fees	5,052.50	5,052.50	0.00	5,052.50	5,052.50	0.00	60,630.00	55,577.50
4194.000 Office Supplies	0.00	145.83	145.83	0.00	145.83	145.83	1,750.00	1,750.00
4195.000 Membership Dues	0.00	16.67	16.67	0.00	16.67	16.67	200.00	200.00
4196.000 Telephone	62.25	58.33	(3.92)	62.25	58.33	(3.92)	700.00	637.75
4198.000 Advertising	0.00	83.33	83.33	0.00	83.33	83.33	1,000.00	1,000.00
4199.000 Postage	0.00	37.50	37.50	0.00	37.50	37.50	450.00	450.00
TOTAL ADMINISTRATION	9,391.27	8,931.66	(459.61)	9,391.27	8,931.66	(459.61)	107,180.00	97,788.73
TENANT SERVICES								
4210.000 Tenant Svcs Salaries	0.00	786.25	786.25	0.00	786.25	786.25	9,435.00	9,435.00
4230.000 Tenant Svcs Other	8.74	20.83	12.09	8.74	20.83	12.09	250.00	241.26
TOTAL TENANT SERVICES	8.74	807.08	798.34	8.74	807.08	798.34	9,685.00	9,676.26
UTILITIES								
4310.000 Water	0.00	841.67	841.67	0.00	841.67	841.67	10,100.00	10,100.00
4315.000 Sewer	0.00	1,458.33	1,458.33	0.00	1,458.33	1,458.33	17,500.00	17,500.00
4320.000 Electricity	0.00	3,000.00	3,000.00	0.00	3,000.00	3,000.00	36,000.00	36,000.00
4330.000 Gas	(2,166.04)	1,291.67	3,457.71	(2,166.04)	1,291.67	3,457.71	15,500.00	17,666.04
TOTAL UTILITIES	(2,166.04)	6,591.67	8,757.71	(2,166.04)	6,591.67	8,757.71	79,100.00	81,266.04
MAINTENANCE								
4410.000 Maintenance Labor	6,601.22	4,260.42	(2,340.80)	6,601.22	4,260.42	(2,340.80)	51,125.00	44,523.78
4420.000 Materials	16.68	1,500.00	1,483.32	16.68	1,500.00	1,483.32	18,000.00	17,983.32
4430.000 Contracts Costs	209.67	1,916.67	1,707.00	209.67	1,916.67	1,707.00	23,000.00	22,790.33
4431.000 Garbage and Trash	0.00	483.33	483.33	0.00	483.33	483.33	5,800.00	5,800.00
4432.000 Decorating Contract	0.00	1,666.67	1,666.67	0.00	1,666.67	1,666.67	20,000.00	20,000.00
4435.000 Grounds Contract	0.00	458.33	458.33	0.00	458.33	458.33	5,500.00	5,500.00
4445.000 Elevator Maintenance	2,112.00	525.00	(1,587.00)	2,112.00	525.00	(1,587.00)	6,300.00	4,188.00
4450.000 Plumbing/Heating	0.00	541.67	541.67	0.00	541.67	541.67	6,500.00	6,500.00
4455.000 Snow Removal	0.00	541.67	541.67	0.00	541.67	541.67	6,500.00	6,500.00
4456.000 Exterminating	68.00	416.67	348.67	68.00	416.67	348.67	5,000.00	4,932.00
4457.000 Janitor/Cleaning	0.00	1,025.00	1,025.00	0.00	1,025.00	1,025.00	12,300.00	12,300.00
TOTAL MAINTENANCE	9,007.57	13,335.43	4,327.86	9,007.57	13,335.43	4,327.86	160,025.00	151,017.43

	Period Amount	Period Budget	Period Variance	YTD Amount	YTD Budget	YTD Variance	Annual Budget	Remaining Budget
EXPENSES								
OTHER								
4510.000 Insurance	2,113.08	2,398.34	285.26	2,113.08	2,398.34	285.26	28,780.00	26,666.92
4520.000 Property Taxes	1,099.30	983.33	(115.97)	1,099.30	983.33	(115.97)	11,800.00	10,700.70
4540.000 Employee Benefits	2,554.39	2,517.51	(36.88)	2,554.39	2,517.51	(36.88)	30,210.00	27,655.61
4570.000 Collection Losses	0.00	125.00	125.00	0.00	125.00	125.00	1,500.00	1,500.00
4583.001 Lease Interest Exp	8.96	0.83	(8.13)	8.96	0.83	(8.13)	10.00	1.04
4590.000 Other Gen Exp	0.00	416.67	416.67	0.00	416.67	416.67	5,000.00	5,000.00
4595.001 Lease Amort Exp	52.94	31.25	(21.69)	52.94	31.25	(21.69)	375.00	322.06
TOTAL OTHER	5,828.67	6,472.93	644.26	5,828.67	6,472.93	644.26	77,675.00	71,846.33
TOTAL EXPENSES	22,070.21	36,138.77	14,068.56	22,070.21	36,138.77	14,068.56	433,665.00	411,594.79
SURPLUS	13,925.71	2,046.24	11,879.47	13,925.71	2,046.24	11,879.47	24,555.00	(10,629.29)

**Crosby HRA
Payment Summary Report
April 2026**

Doc. Date		Number	Payments
04/01/2026	Delta Dental	ACH	\$126.66
04/01/2026	Reliance Standard Life	ACH	\$176.98
04/02/2026	Payroll for 04/02/2026	ACH	\$4,644.29
04/02/2026	Security Benefit	ACH	\$547.43
04/02/2026	Minnesota State	ACH	\$62.00
04/02/2026	Harpers Payroll Service	ACH	\$44.85
04/02/2026	Harpers Payroll Service	ACH	\$1,682.01
04/07/2026	To Transfer - 0608 to	ACH	\$400.00
04/13/2026	Payroc LLC	ACH	\$48.10
04/13/2026	Payroc LLC	ACH	\$115.26
04/16/2026	Payroll for 04/16/2026	ACH	\$6,597.42
04/16/2026	Security Benefit	ACH	\$770.08
04/16/2026	Minnesota State	ACH	\$62.00
04/16/2026	Harpers Payroll Service	ACH	\$2,753.04
04/19/2026	Harpers Payroll Service	ACH	\$44.85
04/29/2026	Harpers Payroll Service	ACH	\$55.50
04/30/2026	FY2027 Management	ACH	\$10,105.00
04/30/2026	To Record Bank Fees	ACH	\$15.00
04/30/2026	Payroll for 04/30/2026	ACH	\$4,949.66
04/30/2026	Security Benefit	ACH	\$559.60
04/30/2026	Minnesota State	ACH	\$62.00
04/30/2026	Harpers Payroll Service	ACH	\$1,725.85
04/01/2026	Dearborn National	120232	\$24.10
04/01/2026	Housing Auth Risk	120233	\$12,914.00
04/01/2026	Housing Insurance	120234	\$42,226.70
04/01/2026	League of MN Cities	120235	\$3,874.00
04/01/2026	Medica	120236	\$2,123.41
04/01/2026	ShofCorp LLC	120237	\$75.48
04/14/2026	Borden Steinbauer	120238	\$55.00
04/14/2026	Crow Wing County	120239	\$350.00
04/14/2026	Ctc-446126	120240	\$382.18
04/14/2026	Goodin Company	120241	\$300.65
04/14/2026	Granite Pest Control LLC	120242	\$136.00
04/14/2026	Holden Electric Co. Inc.	120243	\$1,142.50
04/14/2026	Minnesota Energy	120244	\$3,511.23
04/14/2026	MN Elevator, Inc.	120245	\$4,224.00
04/14/2026	Waste Partners Inc	120246	\$712.51
04/14/2026	Minnesota Power	120247	\$24.00
Total			\$107,623.34

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To: Crosby HRA Board Members
From: Diana Banks, Certified Housing Specialist
Date: May 1, 2026
Re: Housing Programs Report

Tenant Activities Update

Second Harvest Boxes: 10
Cuyuna Range Food Shelf Deliveries: 20
Community Meals from Crosby Community Table: 190
Events: Study with Zed (5); Oak Street Chapel Band (10)

Monthly Property Performance Stats for April 2026

- Occupancy Rate: 100% Dellwood; 100% Edgewood; 100% Scattered Sites
- New Move-Ins: 0
- Move Outs: 2
- Annual Recertifications: 7
- Termination Notices: 3
- Work Orders Received: 98

Waiting Lists as of 4/30/2026

1BR	2BR	3BR	4BR
87	30	17	7

Management and Occupancy Review (MOR)

Minnesota Housing has scheduled an MOR for Edgewood Apartments on June 10th, 2026. This on-site review will include a tenant file audit and a physical inspection of the property. Staff are currently reviewing tenant files to ensure compliance with program requirements.

Discussion Items

- No discussion items this month

Tenant Council summary for the month of April 2026

No meeting held in April

Income and Expenses for the month of April

Coffee income: \$100.55

Coffee expense: \$38.06

Bingo income: \$86.00

Bingo expense: \$67.17

Donation: \$20.00

Kitchen expense: \$3.00

Progressive Bingo expense: \$25.00

Birdseed expense: \$24.80

Deposited into Checking: \$20.00

Petty Cash for end of April: \$306.69

Checking for end of April: \$960.71

OLD BUSINESS:

Had our Easter potluck on April 11th, there were 21 in attendance. Tenant council provided 2 hams, there was a lot of other food and great fellowship. We don't charge for the holiday potlucks, but received a \$20.00 donation.

Had our usual activities for the month of April.

NEW BUSINESS:

A tenant purchased a garden hose for people to use in the community garden.

We will be having a Craft/Bake sale on May 9th. Hoping to get lots of items to sell. All the money raised goes to the tenant council fund.

Our next potluck will be May 23rd at 1 p.m. The cost is now \$5.00 if don't bring food to share.

Regular activities for the month as usual.



To: Crosby HRA Board Members
From: John Schommer, Rehab & Maintenance Director
Date: May 7, 2026
Re: Maintenance Update

Edgewood Apartments NSPIRE Inspection

We finally were able to access our NSPIRE inspection results (attached), staff is working on finishing up repairs that were identified during the inspection.

Public Housing NSPIRE Inspection

We received the refrigerator gaskets to replace those that were noted as deficient in our NSPIRE inspection but they do not fit. Staff reached out to the manufacturer and verified that we ordered the correct part number, and we verified that we received the gaskets we ordered but they are at least 2" larger than the gaskets we need to replace. We are researching if we can get ones that fit but in the meantime we will likely have to switch out the refrigerators in those units to complete the work in the required timeframe.

Elevators

Staff has issued a quote request for the modernization services to get this moving forward as we haven't been able to resolve all the issues with the vendor we were working with. The request was sent to 13 firms with a due date of June 1st, 2026.

No Action Requested; Discussion Items.



Inspection No: INSP-69737
Inspection Type: General NSPIRE Inspection

Property: (800010895) -
Inspector: ,

Inspection Date: 3/5/2026

Escort Name: Diana Banks
Property Type:
Inspection Start Date/Time: 3/5/2026 9:30 AM

Escort Email: diana@crosbyhra.org
Scattered Site:
Inspection End Date/Time: 3/5/2026 12:15 PM

Present During Inspection: Yes

Preliminary Scores

Preliminary Inspection Score: 97
Preliminary Calculated Score: 97
Preliminary Units Threshold: 2.83
Preliminary Property Threshold: 3
Preliminary Projected Inspection Score: 86
Preliminary Non-Scored Symbols: *^

Final Scores

Final Inspection Score: 97
Final Calculated Score: 97
Final Units Threshold: 2.83
Final Property Threshold: 3
Final Projected Inspection Score: 86
Final Non-Scored Symbols: *^
Final Review: Accept

Building/Unit Inspection Data

Type	Inspection		
	Property Total	Sample Size	Total Units Inspected
Buildings	1	1	1
Units	61	22	22

Occupancy Information

Occupancy Rate(%)
97

Deficiency Summary

Inspectable Area	Life-Threatening	Severe	Moderate	Low
Inside	0	2	2	0
Outside	0	0	0	0
Units	1	15	6	6

Scoring Summary

Inspectable Area	Life-Threatening	Severe	Moderate	Low
Inside				
Outside				
Units				
Total				
			Overall	

Inspection Summary Report - INSP-69737

Buildings/Units:

Building/Unit Name	Address	Comments
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Inspectable Areas Deficiencies:

Outside							
Deficiency Details	Deficiency Name	Location	Comments	Deficiency Picture	Deduction Pts.	Repeat Indicator	Severity

- 1. Asterisk (*) - Smoke Detector
- 2. Plus (+) - Carbon Monoxide
- 3. Caret (^) - Not Scored for 12 Months

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To: Crosby HRA Board Members
From: Eric Charpentier, Executive Director
Date: May 12th, 2026
Re: Updates to Employee Personnel Policy

Effective January 1, 2026, the Minnesota Legislature modified the language surrounding meal and break times for hourly employees (absent a collective bargaining agreement (CBA) that states otherwise). The language changed the wording from “permit” to “allow” a meal break of 30 minutes for an employee that works more than eight consecutive hours. The language was also updated from “permit” to “allow” employees to take a rest break of at least 15 minutes within each 4 consecutive hours of work. We have had our attorney update the language in our employee personnel policy, to mirror the amended state statute governing rest and meal break requirements (Minnesota Statutes Section 177.253 and 177.254 respectively). This avoids unintentional deviations from the law and ensures employees are getting what they are entitled to.

As of January 1st, 2026, employers are now required to:

- “Allow” employees to take a meal break of at least 30 minutes if they work **six** or more consecutive hours. This is a significant change from last year, when employers were only required to “permit” employees working **eight** or more consecutive hours “sufficient” time to eat, without specifying how much time that would be; and
- “Allow” employees to take a rest break of at least 15 minutes or enough time to utilize the nearest convenient restroom, whichever is longer, within each four consecutive hours of work. This is another significant change because previously the rest break requirement only was for employees to be given “adequate” time to use the restroom, without specifying the specific amount of time that could be.

Also, effective January 1st, 2026 is the new Minnesota Paid Leave. We are including the updates to our employee personnel policy to update the statutory requirements for employers and employees for such leave. Minnesota’s Paid Leave law provides most employees with up to 20 weeks of combined paid family and medical leave per year. The program is funded through a 0.64% payroll premium, split between employers and employees. Leave benefits are paid by the State of Minnesota, with partial wage replacement based on an employee’s earnings.

We have also made edits to our policy to update the addition of the Juneteenth state holiday. We updated the drug, alcohol and cannabis free workplace and testing policy to reflect the changes in the State laws surrounding recreational cannabis. We also updated the section for appropriate work attire which will now allow our staff to wear shorts, which primarily was updated to reflect a request from our maintenance staff.

Action Requested; Approve Resolution No. 2027-03 updating the Employee Personnel Policy.

**CROSBY HOUSING AND
REDEVELOPMENT AUTHORITY**

PERSONNEL POLICIES

ADOPTED BY THE BOARD OF COMMISSIONERS

~~**JANUARY 15, 2025**~~

MAY 12, 2026

Crosby Housing and Redevelopment Authority Personnel Policies

Table of Contents

<u>Section</u>	<u>Page</u>
I. Introduction	
(I-1) Purpose and Intent	1
(I-2) Equal Employment Opportunity and Reasonable Accommodation.....	1
II. General Practices and Procedures	
(II-1) Employer Authority & Employee Responsibilities.....	4
(II-2) Hours of Work.....	5
(II-3) Attendance.....	5
(II-4) Uniforms.....	5
III. Employment Policies	
(III-1) Harassment, Discrimination, and Retaliation Policy	6
(III-2) Reasonable Accommodation	8
(III-3) Conflicts of Interest Policy	9
(III-4) Outside Employment Policy	11
(III-5) Political Activity Policy.....	11
(III-6) Dress Code.....	12
(III-7) Smoking and Tobacco Use Policy	13
(III-8) Drug, Alcohol and Cannabis Free Workplace Policy	13
(III-9) Personnel Records Policy	19

Employment Policies (continued)

(III-10) Confidentiality Policy 20
(III-11) Inclement Weather Policy 20
(III-12) Use of Housing Authority Property 21
(III-13) Operation of Housing Authority Vehicles 22
(III-14) Business Travel and Reimbursement Policy 23
(III-15) Electronic Communications and Computer Use Policy 26
(III-16) Social Media Policy 32

IV. Employee Recruitment/Hiring

(IV-1) Recruitment and Selection of Employees 34
(IV-2) Types of Employment 35
(IV-3) Probationary Period 36
(IV-4) Authorized Personnel on the Job Site 36

V. Compensation

(V-1) Salary Increases 37
(V-2) Overtime 37
(V-3) On-call Pay 38
(V-4) Pay Periods 38
(V-5) Time Sheets 38

VI. Benefits

(VI-1) Health Insurance 39
(VI-2) Long-Term Disability Insurance..... 39
(VI-3) Life Insurance 39
(VI-4) Retirement..... 39

VII. Time Away

(VII-1) Holidays..... 40
(VII-2) Vacation Leave..... 40
(VII-3) Sick Leave 41
(VII-4) Personal Leave Time 42
(VII-5) Earned Sick and Safe Time Leave 42
(VII-6) Leave of Absence Without Pay 45
(VII-7) Accommodations for Lactating & Pregnant Employees 45
(VII-8) Workers' Compensation..... 46
(VII-9) Military Leave 46
(VII-10) Jury Leave 46
(VII-11) Voting Leave 47
(VII-12) Bereavement Leave 47
(VII-13) Minnesota Paid Leave 47
(VII-14) Parental Leave 48
(VII-15) School Conference and Activities Leave 49

VIII. Performance Management and Development

(VIII-1) Performance Evaluations50
(VIII-2) Promotion.....50
(VIII-3) Lateral Transfer.....50
(VIII-4) Demotion.....50
(VIII-5) Employee Training.....51
(VIII-6) Code of Conduct51
(VIII-7) Employee Grievances55

IX. Safety and Security

(IX-1) Safety Policy56
(IX-2) Reporting Accidents and Injuries56
(IX-3) No Expectation of Privacy.....56
(IX-4) Workplace Violence57

X. Leaving Employment

(X-1) Layoffs and Reduction in Force.....58
(X-2) Resignation.....58
(X-3) Exit Interview.....58
(X-4) Re-Employment59

XI. Policy Receipt Pages

Receipt Pages... 60-65

I. INTRODUCTION

1. PURPOSE AND INTENT

The Personnel Policies and Procedures (“Personnel Policy”) of the Crosby Housing and Redevelopment Authority (“Housing Authority”) are established as a guide and matter of information only for all employees. The policies and procedures described herein are not conditions for employment.

This Personnel Policy, including employee benefits, salaries, and other policies are subject to change from time to time. Consequently, the benefits referred to in this Personnel Policy constitute those in effect on the date of approval of these policies by the Board of the Housing Authority.

This Personnel Policy handbook is not, and should not be construed as an employment contract. The Housing Authority may change, modify or withdraw the policies and procedures in this Personnel Policy handbook with or without notice to employees, at any time and at its sole discretion. However, when applicable, revisions will be communicated to staff. Additional departmental guidelines and procedures that support the general Personnel Policy may be established and revised based on the organizational needs of the Housing Authority at the discretion of the Executive Director.

The Housing Authority hopes that its employees enjoy successful and fulfilling employment. However, this Personnel Policy does not serve as a contract guaranteeing employment for any specific period of time. All Housing Authority employees are “at-will” employees, meaning that an employee or the Housing Authority may end the employment relationship at any time, with or without cause, notice, or reason.

2. EQUAL EMPLOYMENT OPPORTUNITY AND REASONABLE ACCOMMODATION

This is to affirm the Housing Authority’s policy of providing Equal Opportunity to all employees and applicants for employment and complying with all applicable Equal Employment Opportunity/Affirmative Action laws, directives and regulations of Federal, State and Local governing bodies or agencies thereof. This policy extends to all applicants and employees and to all aspects of the employment relationship, including, but not limited to, recruiting, hiring, promotion, transfer, discipline and compensation.

The Housing Authority is an Equal Employment Opportunity Employer. There shall be no discrimination against employees or applicants for employment on account of race, creed, color, national origin, sex, disability, religion, marital status, pregnancy, sexual orientation, age, genetic information, or any other characteristic protected by state or federal law.

The Housing Authority will take Affirmative Action to ensure that all employment practices are free of discrimination on such bases. The Executive Director shall serve as the Equal Opportunity Coordinator and have overall responsibility of ensuring compliance with this policy. Any employee of the Housing Authority who does not comply with the Equal Employment Opportunity Policies and Procedures set forth in this Personnel Policy may be subject to disciplinary action, up to and including immediate termination. If any employee, or applicant for employment, believes he/she has been discriminated against, he/she shall contact the Housing Authority's Executive Director, specifying the basis of his/her belief and all facts surrounding the alleged discriminatory action.

DISABILITY ACCOMMODATION

It is the policy of the Housing Authority not to discriminate on the basis of disability against any qualified person. To this end all decisions relating to employment including, but not limited to recruitment, selection, training, assignment, promotion, compensation, transfer, benefits, and education, will be determined by the applicant's or employee's ability with consideration of any requested reasonable accommodation. This policy is applicable to all employment policies and practices. The Crosby Housing Authority also provides reasonable accommodation in connection with the provision of Housing Authority services, programs and activities.

The Housing Authority will comply with all applicable federal and state laws concerning the employment of individuals with a disability. Accordingly, it is the Housing Authority's policy not to discriminate against qualified individuals who have a disability with respect to selection and hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment. Further, the Housing Authority will make reasonable efforts to make a reasonable accommodation to qualified individuals with a disability so that they can perform the essential functions of a job.

Definition of reasonable accommodation

Reasonable accommodation is an adjustment to job duties, performance methods, and/or work setting or service delivery to meet the individualized need of an individual, applicant or employee with a disability that does not impose an undue hardship on the Housing Authority. The provision of a reasonable accommodation removes barriers in a specific situation, which prevent or limit the application process, recruitment, and employment of a qualified person with a disability or prevents their participation in a program, activity or event. The term "reasonable accommodation" does not include any removal or reassignment of the essential functions of an employee's job.

Examples of reasonable accommodation

The term "reasonable accommodation" includes, but is not limited to, the following accommodations if providing the accommodation would not impose an undue hardship on the Housing Authority.

- a. Making facilities accessible and usable;
- b. Job restructuring that does not call for the removal or reassignment of essential job functions;
- c. Modifying work schedules;
- d. Implementing flexible leave policies;
- e. Reassigning to a vacant position;
- f. Providing assistive equipment; or
- g. Modifying tests, training materials and policies.

A request for reasonable accommodation by an employee is the first step in an informal, interactive process between the individual and the Housing Authority. The next step in this informal process is to clarify what the individual needs and identify the appropriate reasonable accommodation. The Housing Authority is not required to provide a specific accommodation requested by an employee or applicant.

All information obtained by the Housing Authority concerning the medical condition or history of applicants or employees is maintained in separate medical files and treated as confidential records that are disclosed only as allowed according to applicable state and federal law.

All employees are required to comply with safety standards. If an applicant's physical or medical condition poses a direct threat to the health or safety of individuals in the workplace and this threat cannot be eliminated by reasonable accommodation, the individual will not be hired. Current employees who have a physical or medical condition that poses a direct threat to the health or safety to themselves or others in the workplace may be placed on appropriate leave. All employees are expected to comply with the Housing Authority's Drug Free Workplace Policy.

The Housing Authority will make reasonable accommodations for qualified individuals with known disabilities consistent with the provisions of applicable state and federal law.

Employees should contact the Executive Director to request more information and/or to receive the application for a reasonable accommodation.

II. GENERAL PRACTICES AND PROCEDURES

1. EMPLOYER AUTHORITY & EMPLOYEE RESPONSIBILITIES

Employer's Authority

The Housing Authority, through the Executive Director, retains all rights and authority necessary to operate the Housing Authority including, but not limited to, the right to:

- (1) Direct all employees;
- (2) Plan, direct and control all operations and services of the Housing Authority;
- (3) Determine the methods, means, organization and number of personnel needed for operations and services;
- (4) Assign or transfer employees;
- (5) Schedule working hours and assign overtime;
- (6) Determine whether goods or services should be purchased or contracted for;
- (7) Hire, promote, demote, suspend, discipline, discharge, or relieve employees due to lack of work or other legal reasons or to discharge employees for no reason;
- (8) Make and enforce workplace rules and regulations;
- (9) Change or eliminate existing methods; equipment or facilities;
- (10) Take whatever actions may be necessary to carry out the mission of the Housing Authority; and
- (11) Exercises all other management rights.

Employee's Responsibilities

All Housing Authority employees must be:

- (1) Fair and courteous in meeting the public and working with fellow employees;
- (2) Industrious;
- (3) Neat in work and personal appearance;
- (4) Prompt in reporting for work and in completing assignments;
- (5) Economical in the use of supplies and equipment;
- (6) Cooperative with the public and with fellow employees in getting the job done well;
- (7) Observant of all Housing Authority policies and procedures;
- (8) If certification of any type is required for a position, the employee must already be certified or must obtain certification within the described period that the job description requires;
- (9) Compliant with all federal, state, and local laws, rules, and regulations;
- (10) Compliant with all assignments and directives from the employee's supervisor(s).

2. HOURS OF WORK

Unless otherwise specified by the Executive Director, regular work hours shall be 7:00 a.m. to 5:30 p.m. Monday through ~~Thursday~~ Friday. Employees working six (6) or more consecutive hours will receive an unpaid meal break of at least thirty (30) minutes or with up to one unpaid hour allotted for lunch. Employees taking more than 30 unpaid minutes for a lunch break will flex their work time in the same day to make up the lunch time beyond 30 minutes. Other flexible work schedule options may be available for employees, depending on the staffing needs of the Housing

Authority. Within each four (4) consecutive hours of work, employees will also be allowed one fifteen-minute paid rest break of at least fifteen minutes (15) or enough time to utilize the nearest convenient restroom, whichever is longer for every four hours worked in a day. Service to the public may require other shifts during the work week different than the regular 7:00 am to 5:30 p.m. day. Exempt employees are expected to work additional hours as may be necessary.

3. ATTENDANCE

Attendance and punctuality are very important responsibilities of each employee. Services performed by the Housing Authority require employees' complete cooperation in avoiding unnecessary absences or tardiness. When an employee is absent or late to work, his/her work is affected and his/her fellow employees must do the employee's work for him/her.

Employee dependability is an important factor in eligibility for promotion or continued employment. Unexcused absences and tardiness may subject employees to discipline, up to and including immediate termination.

When an employee is unable to report for work because of illness or some other unexplained reason, the employee must notify his/her supervisor by telephone as soon as possible, but not later than the employee's scheduled start time. Employees must explain the reason why the employee was unable to provide advance notice of the absence and the estimated length of the absence. This will enable the supervisor to plan to have someone else handle the employee's work.

4. UNIFORMS

The Housing Authority, at its sole discretion, may provide employees with uniforms for use in the performance of their duties. Uniforms provided by the Housing Authority remain the property of the Housing Authority and will be subject to the same policy that applies to the use of other Housing Authority property. Uniforms must be returned to the Housing Authority upon separation from employment.

Employees must adhere to detailed laws, guidelines and procedures regarding uniforms and personal protective equipment (PPE) as determined by management. If an employee requests reimbursement for purchasing any PPE at their own expense, proper documentation/certification must be presented to the Executive Director or his/her designee prior to reimbursement.

III. EMPLOYMENT POLICIES

1. HARASSMENT, DISCRIMINATION, AND RETALIATION POLICY

The Housing Authority believes that discrimination, violence, harassment, and/or retaliation in any form constitute misconduct that undermines the integrity of the organization. The Housing Authority therefore prohibits harassment, violence, or discrimination based on age, sex, gender, color, race, religion, national origin, disability, marital status, sexual orientation, genetic information, or status in any other class protected by federal, state, or local law. This policy prohibits harassment of all employees and commissioners, as well as harassment of other persons who come into contact with the Housing Authority.

It shall be a violation of this policy for any employee, agent, officer, commissioner, or other representative of the Housing Authority to engage in offensive or harassing verbal or physical conduct of a sexual nature or regarding race, national origin, gender, religion, disability, age, status with regard to public assistance, marital status, sexual orientation, genetic information, or status in any other class protected by federal, state, or local law, towards any Housing Authority employee, officer, or agent, or any member of the public seeking public services or public accommodation.

It shall be a violation of this policy for any Housing Authority employee, officer, commissioner, agent, or other representative to inflict, threaten to inflict, or attempt to inflict sexual violence or violence based on religion, race, gender, marital status, status with regard to public assistance, sexual orientation, age, national origin, disability, genetic information, or status in any other class protected by federal, state, or local law, upon any employee, agent, or officer of the Housing Authority, or member of the public seeking services or accommodations from the Housing Authority.

Violation of this policy may subject an employee to disciplinary action, up to and including immediate termination of employment.

A. Sexual/Gender-Based Offensive Conduct/Harassment

The Housing Authority defines sexual/gender-based harassment as including unwelcome physical or verbal conduct relating to an individual's gender or directed at an individual because of gender, unwelcome sexual advances, requests for sexual favors, sexually motivated physical contact, and other verbal or physical conduct or communication of a sexual or gender-related nature when:

1. Submission to the unwelcome conduct or communication is made a term or condition, either explicitly or implicitly, for obtaining or retaining employment; or
2. Submission to or rejection of the unwelcome conduct or communication is used as a factor in decisions affecting the person's employment; or
3. The unwelcome conduct or communication has the purpose or effect of substantially or reasonably interfering with a person's employment or creates an intimidating, hostile or offensive work environment.

Examples of offensive conduct which is prohibited by the Housing Authority include, but are not limited to, the following:

1. Unwelcome verbal remarks, jokes, or innuendos of a sexual nature;
2. Unwelcome pressure for sexual activity;
3. Unwelcome sexually motivated or inappropriate patting, pinching, or other sexual contact;
4. Unwelcome sexual behavior or words, including demands for sexual favors, accompanied by implied or overt promises for preferential treatment with regard to an individual's employment or access to public services or public accommodations;
5. Unwelcome sexual behavior or words, including demands for sexual favors or submission to sexual advances accompanied by implied or overt threat concerning an individual's employment or access to public services or public accommodations;
6. Any sexually motivated, unwelcome touching;
7. Distribution or display of written materials, pictures, or other graphics of a sexual or gender biased nature; and
8. Other unwelcome behavior or words directed at an individual because of gender.

B. Sexual Violence

The Housing Authority defines the term "sexual violence" as a physical act of aggression or force, or the threat thereof, which involves the touching of another's intimate parts, or forcing a person to touch any person's intimate parts, including the genital area, groin, inner thigh, buttocks, or breasts, as well as the clothing covering these areas. Sexual violence may include, but is not limited to:

1. Touching, patting, grabbing, or pinching another person's intimate parts, whether that person is of the same sex or opposite sex;
2. Coercing, forcing, or attempting to coerce or force the touching of anyone's intimate parts; and
3. Threatening to force or coerce sexual acts, including the touching of intimate parts or intercourse, on another.

C. Other Harassment

Other prohibited harassment includes, but is not limited to, unwelcome slurs, and offensive remarks based on an employee's age, race, color, religion, national origin, disability, marital status, sexual orientation, genetic information, sex, gender, or membership in any other class protected by state or federal law which create an intimidating, hostile or offensive working environment, or unreasonably interfere with an employee's employment or work performance.

D. Reporting Incidents of Harassment

All Housing Authority employees and commissioners are responsible for helping to ensure that no form of harassment is tolerated. If an individual believes he or she has been subject to illegal discrimination or harassment, he or she should report the conduct to his or her immediate supervisor or to the Executive Director.

Allegations of the harassment will be thoroughly investigated. Complaints of harassment will be taken seriously, and held confidential to the extent permitted by law. Appropriate action, as determined by the Housing Authority, will be taken against any employee who is determined to have engaged in any type of harassment, discrimination, or retaliation.

E. Retaliation Prohibited

The Housing Authority prohibits retaliation of any kind against employees who, in good faith, report harassment or discrimination, or participate or assist in an investigation of alleged harassment or discrimination. If an employee feels he or she has been subjected to any form of retaliation, the employee should report that conduct to his or her supervisor, or to the Executive Director within three calendar days of the offense.

2. REASONABLE ACCOMMODATION

As an Equal Opportunity Employer, the Housing Authority is committed to the fair and equal employment of individuals with disabilities. It is the policy of the Housing Authority to reasonably accommodate qualified individuals with disabilities unless doing so would pose an undue hardship for the Housing Authority. For the purposes of this and related Housing Authority policies, the term "qualified individual with a disability" is defined pursuant to applicable federal and state laws.

If an employee believes that he or she needs a reasonable accommodation, he or she should contact the Executive Director.

3. CONFLICTS OF INTEREST POLICY

Employees must avoid conflicts of interest. Employees shall also avoid using their knowledge or awareness of any Housing Authority actions or potential actions that are not public knowledge for personal gain, financial or otherwise. Violation of one or more of the following rules of conduct, or any applicable federal, state or local law regarding conflicts of interest, may result in disciplinary action, up to and including immediate termination. All employees must complete an acknowledgement form of the conflict of interest policies and procedures on an annual basis.

A. Acquiring an Interest

No employee or Commissioner of the Housing Authority shall acquire any interest direct or indirect in any housing project or in a project included or planned to be included in any project, nor shall he/she have any interest direct or indirect in any contract or proposed contract for materials or services to be furnished or used in connection with any housing project.

If an employee or Commissioner of the Housing Authority owns or controls an interest, direct or indirect, in any property included or planned to be included in any housing project, he/she shall immediately disclose the same in writing to the Housing Authority. Failure to disclose such interest shall constitute misconduct in office.

B. Tips, Gifts, and Discounts

No employee or Commissioner shall directly or indirectly solicit any gift or accept or receive any gift having a value of \$5.00 or more, regardless of the form of the gift, from any:

1. Contractor, prospective contractor, business partner, or prospective business partner of the Housing Authority;
2. Any Housing Authority resident; or
3. Any other person or entity with whom the employee interacts in his or her official capacity as a Housing Authority employee.

If an employee wants an exemption from this policy due to a personal or familial relationship, the employee must request such an exemption from the Board prior to receiving or soliciting any gift. The Board has the sole discretion to grant or deny such a request and may consider the totality of the circumstances, including the employee's relationship to the individual in question, when considering the request.

C. Employment of Relatives/Nepotism

The employment of immediate family members in the same area of an organization may cause conflicts. In addition to claims of partiality in treatment at work, personal conflict from outside the work environment may be carried into day-to-day working relationships.

Immediate family members of persons currently employed by the Housing Authority may be hired only if they will not be working directly for, or supervising, a relative within the Housing Authority. Immediate family members of Housing Authority employees shall not be employed, promoted, or engaged to perform services where one relative will or may supervise or directly influence the recruitment, employment, salary, fees, or performance review of another relative. This policy applies to any relative, higher or lower within the Housing Authority's organization, who has the authority to review employment decisions. Housing Authority employees cannot be transferred into such a reporting relationship.

For purposes of this Policy, the term "immediate family" is defined as wife, husband, mother, father, daughter, son, sister, brother, half-sister, half-brother, stepmother, stepfather, stepson, stepsister, stepbrother, stepdaughter, grandmother, grandfather, granddaughter, grandson, mother-in-law, father-in-law, daughter-in-law, son-in-law, sister-in-law, and brother-in-law.

In exceptional circumstances, a direct supervisory relationship may exist between employees who are members of the same immediate family. Such circumstances may be necessitated by factors such as the unique qualifications or responsibilities of the individuals involved or the lack of other available appropriate supervisory personnel. Any exception must be approved by the Executive Director, and all employment decisions affecting the subordinate employee, including selection, hiring, discipline, investigation, performance reviews, compensation, or leaves of absence, must be assigned to another supervisory employee. Exceptions involving the Executive Director must be approved by the Housing Authority Board.

D. Fraternization

For the purpose of this Policy, fraternization is defined as a relationship that is romantic and/or intimate in nature. The term also includes, but is not limited to, any social relationship that has potential to cause a negative impact on staff morale, favoritism or the appearance of favoritism in employment or the receipt of public benefits, discrimination in violation of this Personnel Policy, interfere with general business operations or create a hostile work environment.

Fraternization between the following groups is prohibited:

1. Housing Authority employees and Housing Authority residents; and
2. Housing Authority employees and Housing Authority contractors.

In addition, the Housing Authority strongly discourages fraternization between Housing Authority employees and other Housing Authority employees due to the concerns discussed above.

Any employee having a preexisting romantic, intimate, or other relationship that would violate the terms of this policy at the time this policy was adopted or before being hired by the Housing Authority, if hired after the adoption of this policy, must inform the Executive Director of the relationship within five (5) business days of the employee's receipt of the Personnel Policy.

The violation of this policy may subject an employee to discipline, up to and including immediate termination. When considering whether a violation of this Policy has occurred, the Housing Authority may, but is not required to, consider any preexisting relationship between the employee and the individual in question.

4. OUTSIDE EMPLOYMENT POLICY

The work of the Housing Authority shall have precedence over all outside employment.

An employee must provide notice of outside employment for approval by the Executive Director, who has the sole discretion to determine if the requested employment violates any of the terms of the Housing Authority Policies. This approval or disapproval shall be placed in the employee's personnel file.

No employee shall use Housing Authority working hours to promote or carry out outside employment. In addition, no employee shall use any equipment, supplies, or office space owned by the Housing Authority for outside employment purposes.

No employee shall engage in outside employment, which impairs the efficiency of Housing Authority services or results in any conflict of interest with the Housing Authority. For purposes of this Policy, a conflict of interest exists when the employee performs work for any Housing Authority resident, contractor, or other person or entity doing business with the Housing Authority.

No employee shall perform any work as a professional, contractor, or subcontractor for any outside employer, whose work will be submitted to the Housing Authority for review, approval, or inspections. No employee shall perform any work for any contractor, person, or company that has a contract or agreement with the Housing Authority.

Any violation of this Policy on outside employment shall be grounds for disciplinary action, up to and including immediate termination.

5. POLITICAL ACTIVITY POLICY

All full-time Housing Authority employees and all part-time Housing Authority employees whose employment with Housing Authority is their primary employment are subject to the provisions of the Hatch Act and to all amendments made thereto.

Every eligible employee may exercise his/her right to vote in all legal elections. However, Housing Authority employees shall not:

1. Engage in any political activity while on duty;
2. Be required as a duty of office or employment or as an condition for employment, promotion or tenure of office, to contribute funds for political or partisan purposes;
3. Coerce or compel contributions for political or partisan purposes by any other employee of the Housing Authority, or use official authority or influence to coerce the political action of any person or party; or
4. Use any supplies or equipment of the Housing Authority for partisan political purposes.

Any Housing Authority employee who wishes to run for a federal, state, or local elective office in an election must request permission from the Executive Director or his/her designee prior to filing for office. The Executive Director may approve of any such request if he or she determines that the individual is permitted to run for elected office under the Hatch Act, 5 U.S.C. § 1502, as amended. Depending on the duties of the employee and the office sought, the individual may be placed on unpaid leave of absence status for the duration of the campaign (for a maximum of 90 days) if the request is approved.

Violations of any of these prohibitions may result in disciplinary action, up to and including termination.

6. DRESS CODE

The objective of the Housing Authority is to allow its employees to work comfortably in the workplace, while still projecting a professional image to all we serve. Employees must dress in a manner that reflects professionalism at all times while on duty. Business casual attire is required. Prior approval must be obtained from the Executive Director in order to dress in a manner that is not in accordance with this Policy. The Executive Director will consider each such request based on the employee and his/her reasons for requesting to be exempt from this Policy. The Executive Director has the sole discretion to grant or deny such a request.

Employees may be required to wear uniformed attire according to the Housing Authority's organizational needs and health and safety requirements.

It is the responsibility of the supervisor to monitor the dress of his/her subordinates to ensure that the Housing Authority employees comply with this section.

Employees who fail to adhere to this Policy may be asked to leave the worksite and return in appropriate attire; time the employee spends away from the worksite to change attire in response to a failure to adhere to this Policy may be taken out of the employee's vacation leave. Violations of this Policy may also subject the employee to disciplinary action, up to and including immediate termination.

A. Prohibited Attire

The following attire is prohibited: ~~shorts above the knee shorts of any length (with the exception of Capri styled pants)~~; miniskirts, low cut blouses, spaghetti straps or camisoles (unless covered by a shirt or jacket), tank tops, transparent shirts or blouses without proper coverage underneath the garment, halter tops, muscle shirts, extremely form fitting pants or clothing of any type, off the shoulder tops, tops with the back fabric out, clothing with inappropriate and/or offensive messages, logos, or pictures, wind suits, sweat suits, overalls, clothes that are not clean or pressed, clothes with holes in them, head wraps (unless pre-approved and necessary for religious or medical reasons), hats, or other items which are determined to be inappropriate by the supervisor or the Executive Director. In addition, employees may be required to cover or temporarily remove visible piercings or cover body art (i.e. tattoos) if deemed offensive or inappropriate for the work environment (at the sole discretion of management).

When in doubt about the appropriateness of attire, employees must consult their supervisor or the Executive Director. Employees may not wear clothing or accessories that create a safety hazard.

B. Reasonable Accommodation

If an employee requires a reasonable accommodation regarding their dress for bona fide health and/or religious reasons, he/she should contact the Executive Director to discuss an exception to this Policy.

7. SMOKING AND TOBACCO USE POLICY

This Smoking and Tobacco Use Policy is designed to foster the health and safety of all employees, residents and visitors in the conduct of Housing Authority business. It is not intended to totally prohibit smoking or use of other tobacco products on Housing Authority properties, but does restrict smoking and use of other tobacco products to certain designated areas. Smoking and use of any other tobacco products, including but not limited to use of electronic cigarettes and chewing tobacco, is permitted only in the designated outside tobacco zone(s). Smoking and use of any other tobacco products, including but not limited to use of electronic cigarettes and chewing tobacco, is not permitted in employee workspaces or in any building owned by the Housing Authority.

Smoking and other use of tobacco products can damage sensitive technical equipment and can be a safety hazard. Accordingly, smoking and use of any other tobacco products is also prohibited where combustible fumes can collect, such as in garage and storage areas, areas where chemicals are used, and all other designated areas where an occupational safety or health hazard might exist.

Smoking and use of any other tobacco products, including but not limited to electronic cigarettes and chewing tobacco, is not permitted in Housing Authority vehicles. The Housing Authority, in its sole discretion, may designate other locations where smoking and use of tobacco products is prohibited. Any personal breaks taken from work to smoke and/or use any tobacco products, including but not limited to using electronic cigarettes and chewing tobacco, should not interfere with the employee's overall work productivity or performance.

All employees, visitors and guests on Housing Authority properties are expected to honor all provisions of this Policy as well as all smoking and tobacco-related laws and ordinances.

~~8. DRUG-FREE WORKPLACE POLICY DRUG, ALCOHOL, AND CANNABIS FREE WORKPLACE AND TESTING POLICY~~

~~—The Housing Authority is committed to maintaining a drug-free workplace. This goal is consistent with national policy and in the interest of employees, customers, and the general public. The presence of illegal drugs and alcohol in the workplace is contrary to Housing Authority Policy and the Drug Free Workplace Act of 1988, as amended.~~

~~—Acts involving drug and alcohol use in the workplace and/or which adversely affect job~~

~~performance or Housing Authority interest will be dealt with promptly, fairly, and firmly.~~

~~Substance abuse is the misuse or illegal use of any material or controlled substance which alters mood, perception, and consciousness or impairs one's performance.~~

~~Violations of this Drug Free Workplace Policy include, but are not limited to, the following actions by an employee:~~

~~(1) Possession of illegal drugs and/or alcohol while in the workplace, at the job site, traveling to and from the job site in a Housing Authority vehicle, or while representing Housing Authority away from the workplace;~~

~~(2) Using or being under the influence of illegal drugs and/or alcohol or other controlled substances while in the workplace, at the job site, while traveling to and from the job site in a Housing Authority vehicle, or while representing Housing Authority away from the workplace;~~

~~(3) Distributing or manufacturing illegal drugs, and/or alcohol on or off of Housing Authority premises during any working hours for which the employee is being compensated or paid;~~

~~(4) Failing to report a conviction of a drug or alcohol related crime to the Executive Director or his/her designee within five (5) calendar days of the date of the conviction; and~~

~~(5) Failing to report an arrest for any crime involving the operation of a motor vehicle under the influence of illegal drugs, alcohol, or other controlled substances to the Executive Director or his/her designee within five (5) calendar days of the date of the arrest.~~

~~An employee will be considered under the influence when, in the judgment of the supervisor, the employee's ability to perform his or her job safely and effectively is affected by the use of drugs and/or alcohol.~~

~~The Housing Authority reserves the right to terminate any employee who has been arrested for, pled guilty to, or convicted of any crime involving the operation of a motor vehicle under the influence of illegal drugs, alcohol, or other controlled substances. This includes all such crimes occurring outside of work hours and all such crimes involving the use of any vehicle owned or leased by the Housing Authority, the employee's personal vehicle, or any other vehicle.~~

~~A. Drug and Alcohol Testing~~

~~The Housing Authority reserves the right to conduct pre-employment drug and alcohol testing, reasonable suspicion drug and alcohol testing, random drug and alcohol testing, annual routine drug and alcohol testing, and post-accident drug and alcohol testing consistent with all applicable laws, including but not limited to, Minnesota Statutes, section 181.951 (as amended).~~

~~Testing may include urinalysis, and/or blood sampling. A positive test result means a finding of the presence of drugs, alcohol, or their metabolites in the sample tested at or above the threshold detection levels established by Minnesota law. An alcohol test will be considered positive if the testee has an alcohol concentration level of at least .02 or a lesser level if it is~~

~~accompanied by an odor of an alcoholic beverage or signs of physical impairment. However, if job performance is impaired, an employee is considered under the influence with a blood alcohol reading of less than .02%.~~

~~— Applicants and employees have the right to refuse any requested drug test. Such refusal may be the basis for revoking a conditional job offer to an applicant and may subject an employee to discipline, up to and including immediate termination.~~

~~1. — Job Applicant Testing~~

~~— Job applicants who have received job offers from the Housing Authority may be subject to drug and alcohol testing prior to appointment. Offers of employment may be strictly conditional and contingent upon the successful completion of drug and alcohol testing. A positive test may be used as the basis for denying employment, if the positive test is verified by a confirmatory test.~~

~~2. — Reasonable Suspicion Testing~~

~~— The Housing Authority may require testing of an employee when there is reasonable suspicion that the employee is under the influence of drugs or alcohol. Reasonable suspicion is based upon, but not limited to, specific, current, unexplainable observations concerning appearance, behavior, speech, or body odors. In order to remove any possibility of danger to the employee, the public, other employees, or property, employees who are reasonably suspected of being under the influence of illegal drugs or alcohol will be removed from the workplace and may be immediately tested and placed on leave pending a final determination of the substance test.~~

~~3. — Post-Accident Testing~~

~~— When an employee is involved in an accident in the course of employment, post-accident testing may be done (1) after an accident involving a Housing Authority owned vehicle or Housing Authority owned property, (2) when the accident involved a fatality or a personal injury requiring immediate medical attention, or (3) when a determination is made by Housing Authority or law enforcement that the employee caused the accident. Any employees involved in an accident must contact their supervisor and notify the Executive Director or his/her designee immediately.~~

~~4. — Random Testing~~

~~— Employees holding safety sensitive positions may be subject to random drug and alcohol testing.~~

~~5. — Routine Testing~~

~~— Employees may be required to submit to drug and alcohol testing on an annual basis as part of a routine physical examination. Notice of any such test will be provided in writing at least two weeks prior to the date of the test.~~

~~B. — Confirmatory Testing~~

~~—If a positive test is obtained, a second test will be performed on the same sample for confirmation before disciplinary action is initiated. If a sample which tests positive in the initial test and is negative in the confirming test, the employee or job applicant will be reported as negative. Employees or job applicants whose samples test positive in both tests shall be reported positive. An employee or job applicant has the right to explain a positive test result on a confirmatory test or to request and have a confirmed positive sample retested at the same or another Housing Authority approved laboratory at the employee's own expense (approved laboratories must be in compliance with the Clinical Laboratory Improvement Act of 1992, and any amendments thereto).~~

~~—In addition, upon a positive test result, an employee may show that he or she is taking a prescription drug under the supervision of a physician, or a nonprescription drug in accordance with its directions, and the positive test result will be reevaluated in light of the drug and dosage used. If such a reevaluation shows that the positive result was caused by such use of prescription or nonprescription drugs, the result will be reported as negative.~~

C. Discipline for Positive Results of Drug or Alcohol Test

~~—Employees who test positive for drugs or alcohol on a confirmatory test or a confirmatory retest may be subject to discipline, up to and including termination of employment. Employees may be given the opportunity to go through rehabilitation following a first positive test. All discipline pursuant to this Policy will be consistent with applicable law, including but not limited to, Minnesota Statutes section 181.953 (as amended).~~

D. Employee Rehabilitation

~~—Employees who have a personal problem with drugs or alcohol are encouraged to seek assistance through professional resources. The Executive Director or his/her designee has information concerning these resources.~~

E. Searches

~~—When there is reasonable belief that drugs or alcohol are present on Housing Authority premises, in Housing Authority vehicles, or in the possession of an employee, or in his or her desk or other container, Housing Authority reserves the right to conduct a search. Information regarding suspected illegal drug related activity by an employee may be reported to law enforcement authorities. Nothing in this policy shall be construed as implying or stating that any employee has a right to privacy in any property owned or operated by the Housing Authority. The Housing Authority reserves the right to search any Housing Authority property, including all vehicles, desks, and other containers provided to Housing Authority employees, at any time, with or without reasonable suspicion.~~

F. Off the Job Offenses

~~—Any employee arrested, charged with, or convicted of a drug or alcohol related offense must notify his/her supervisor in writing within five (5) calendar days of the arrest, charge, or~~

~~conviction and may be subject to disciplinary action, up to and including immediate termination. Conviction means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of federal or state criminal drug statutes involving manufacture, sale, distribution, dispensation, use or possession of any controlled substance. Such employee may be required to submit to substance testing as defined herein.~~

G. On the Job Possession

~~— Possession, use, sale, manufacturing, distribution, or disbursing of illegal drugs or alcohol on the job or in Housing Authority vehicles will be grounds for immediate disciplinary action up to and including immediate termination.~~

~~The possession, use, sale, manufacturing, distribution, or disbursing of illegal drugs, alcohol, or other controlled substances may also be used as the basis for reasonable suspicion drug testing, and/or referred to appropriate law enforcement personnel. If an employee is observed using alcohol or drug paraphernalia, as that term is defined by Minnesota law, the supervisor may demand that the employee surrender the alcohol or drug paraphernalia pending any such testing or investigation.~~

Housing Authority is committed to maintaining a safe environment for its employees and its clients. As part of this commitment, Housing Authority maintains a drug, alcohol, and cannabis free workplace. Except as provided below, this expectation applies to all employees (including any contract or temporary employees) of Housing Authority.

This Drug, Alcohol, and Cannabis Free Workplace and Testing Policy applies to all employees of Housing Authority.

No employee may use, possess, distribute, sell, offer, purchase, transfer, or be under the influence of alcohol, drugs including cannabis or drug paraphernalia while on Housing Authority owned and managed properties, while on duty, while on “on-call” status, while operating a vehicle or machine that is owned or leased by Housing Authority, or while driving a personal vehicle while on Housing Authority business, except (1) pursuant to a valid medical prescription used as properly instructed; or (2) the use of over the counter drugs used as intended by the manufacturer. .

Employees who are called into work for an emergency or while “on-call” should not report to work if under the influence of alcohol or drugs. Any such employee who is under the influence when called into work is required to immediately notify his or her supervisor that the employee is unable to report to work.

This policy applies to all official or unofficial break and meal periods, and all other times during the working day in which an employee has reported for work, including unpaid meal breaks.

All employees who are legally using medically authorized drugs, medications, cannabis, or controlled substances that may adversely affect or alter his or her work performance, have an affirmative duty to

notify the appropriate supervisor or the executive director of his or her use of the drug, medication, cannabis, or controlled substance by the start of the employee's scheduled duties. "Alter" means changed behavior which may limit an employee's ability to perform job duties safely, efficiently, and professionally, or the behavior poses a threat to the safety of the employee or others. Such employees may be sent home and/or prohibited from reporting to work while legally using or under the influence of such medications, drugs, cannabis, or controlled substances.

The policies, rules and procedures contained in this policy supersede all existing Housing Authority rules, regulations booklet, policy manual or other policy statements to the extent that there is any inconsistency.

Violation of this drug, alcohol, and cannabis free workplace and testing policy may result in discipline up to and including discharge.

Inspections:

When there is reasonable belief that drugs, alcohol, or cannabis are present on Housing Authority premises, in Housing Authority vehicles, or in possession of an employee, or in his or her desk or other container, Housing Authority reserves the right to conduct a search. Information regarding suspected illegal drug related activity by an employee may be reported to law enforcement authorities. Nothing in this policy should be construed as implying or stating that an employee has a right to privacy in any property owned or operated by Housing Authority. Housing Authority reserves the right to search any Housing Authority property, including all vehicles, desks, and other contents provided to Housing Authority employees, at any time, with or without reasonable suspicion.

Drug, Alcohol, and Cannabis Testing:

Definitions

For the purposes of this policy, the following terms are defined as follows. To the extent that these definitions are inconsistent with applicable law, the definition provided in law shall control:

Confirmatory Test and Confirmatory Retest: a drug, cannabis, or alcohol test that uses a method of analysis allowed by the Minnesota Drug and Alcohol Testing in the Workplace Act to be used for such purposes.

Drug: a controlled substance as defined in Minnesota Statutes, section 152.01, subdivision 4; or a controlled substance listed in Schedule I through V of Section 202 of the Controlled Substances Act (21 U.S.C. 812), and as further defined by regulation at 21 C.F.R. 1300.11 through 1300.15. For purposes of this policy the term "drug" does not include cannabis (as defined herein), except where otherwise provided by law or in this policy, including for those positions for which cannabis is considered a drug, as defined in this Section.

Drug and Alcohol Testing: the analysis of a body component sample approved according to the standards established by the Minnesota Drug and Alcohol Testing in the Workplace Act for the purpose of measuring the presence or absence of drugs, alcohol, or their metabolites in the sample tested. “Drug and alcohol testing,” “drug or alcohol testing,” and “drug or alcohol test” do not include cannabis or cannabis testing, unless stated otherwise herein.

Cannabis Testing: the analysis of a body component sample according to the standards established under one of the programs listed in Minnesota Statutes, section 181.953, subdivision 1, for the purpose of measuring the presence or absence of cannabis or cannabis metabolites in the sample tested.

Drug Paraphernalia: the meaning as defined in Minnesota Statutes, section 152.01, subdivision 18.

Reasonable Suspicion: a basis for forming a belief based on specific facts and rational inferences drawn from those facts. Reasonable suspicion is based upon, but not limited to, specific, current, unexplainable observations concerning appearance, behavior, speech, or body odors.

Under the Influence: either (a) having the presence of a drug or alcohol at or above the level of a positive test result; (b) having consumed any amount of alcohol for a period of four (4) hours prior to reporting for work, or (c) being impaired in any manner from alcohol, cannabis, or a controlled substance when reporting for work, while on duty, on Housing Authority’s premises, while operating any Housing Authority vehicle, machinery or equipment, or when performing any Housing Authority business, except (1) pursuant to a valid medical prescription used as properly instructed; or (2) the use of over-the-counter controlled substance used as intended by the manufacturer.

Positive test result: Means a finding of the presence of alcohol, drugs, cannabis, or their metabolites in the sample tested in levels at or above the threshold detection levels contained in the standards of one of the programs listed in the Minnesota Statutes, section 181.953, subdivision 1.

Drug and Alcohol Testing will be conducted under the following circumstances:

1. Reasonable Suspicion Testing

Consistent with Minn. Stat. § 181.951, subd. 5, employees will be subject to drug, alcohol, or cannabis testing if there is reasonable suspicion that:

- the employee is under the influence of drugs or alcohol;
- the employee has violated Housing Authority’s written work rules prohibiting the use, possession, sale, or transfer of drugs, alcohol or cannabis while the employee is working or while the employee is on Housing Authority’s premises or operating Housing Authority’s vehicle, machinery, or equipment provided the work rules are in writing and contained in Housing Authority’s written drug, alcohol, and cannabis testing policy;
- the employee has sustained ed a personal injury as defined in Minnesota Statutes, section 176.011, subdivision 16, or has caused another employee to sustain a personal injury; or

- the employee has caused a work-related accident, or the employee was operating or helping to operate machinery, equipment, or vehicles involved in a work-related accident.

Nothing in this policy shall be construed as requiring Housing Authority to test any employee for the presence of drugs, cannabis, or alcohol. Housing Authority reserves the right to discipline or discharge an employee for violation of workplace rules and policies based on evidence other than the results of a drug, cannabis, and/or alcohol test.

Any employee who suspects that another employee may be under the influence while at work (as defined in this document) must report that suspicion to management in the following order until a member of management has been reached: the reporting employee's own supervisor, the Executive Director, or another supervisor.

2. Treatment Program Testing & Follow-up

An employee who has been referred for chemical dependency assessment/evaluation or treatment by Housing Authority, who is participating in a chemical dependency program under an employee benefit plan, or who has been referred to chemical dependency education or programming or training following a positive test, may be requested or required to undergo a drug and/or alcohol test without prior notice at any time during the evaluation and treatment period, and for up to two years following completion of any prescribed chemical dependency treatment program.

Right to Refuse to be Tested:

An employee has a right to refuse to be tested. However, any employee who refuses to submit to a test, or who refuses to comply with any requirement imposed by this policy, or who engages in behavior, which prevents meaningful completion of testing, will be subject to disciplinary action up to and including termination. An employee who substitutes, or attempts to substitute, alters, or attempts to alter a testing sample is considered to have refused to take a test. In such a case, the employee is subject to immediate termination.

An employee who, on religious grounds, refuses to undergo testing of a blood sample will not be considered to have refused testing, unless the employee also refuses to undergo testing of a urine sample.

Consequences of a Negative Test:

If the result of the initial and if necessary, confirmatory drug and alcohol screening is negative, the employee is considered to have satisfactorily completed the drug and/or alcohol test.

Positive Test:

1. Confirmatory Test / Employees: If the confirmatory test result is positive, the employee may be subject to disciplinary action, up to and including termination, subject to the following:

a. First Positive Test Result: An employee will not be terminated for the first positive result on a confirmatory test for alcohol, drugs, or cannabis unless the employee:

- i. has previously been given the opportunity to participate in a drug, alcohol, or cannabis counseling, training, education, or rehabilitation program and has refused to participate in the recommendations; or
- ii. has failed to successfully complete the program or education, as evidenced by withdrawal from the program before its completion; or
- iii. receives a positive test result on a confirmatory test during or after completion of the treatment provider's recommendations.

b. Second Positive Test Result: An employee who receives a positive result on a confirmatory test for alcohol, drugs, or cannabis and who has previously received a positive result on a confirmatory test for alcohol, drugs, or cannabis will be disciplined up to and including termination.

Communication of Test Results and Appeal Rights:

Within three (3) working days of receiving a test result from a testing laboratory, Housing Authority's Executive Director will notify the employee in writing of the test results. An employee has the right to request and receive from Housing Authority a copy of the test result on any drug, alcohol, or cannabis test. Such a request must be written and delivered to Housing Authority during normal operating hours.

Any employee who tests positive on a confirmatory test will have three (3) working days following the day on which the employee is notified of the positive confirmatory test result to disclose drugs/medications that they have taken and/or other information to explain the test result.

An employee who tests positive on a confirmatory test will have five (5) working days following the day on which he or she is notified of the confirmatory test result to advise Housing Authority in writing of his or her desire to request a confirmatory retest of the original sample at the individual's own expense. Within three working days after receipt of the notice, Housing Authority will notify the original testing laboratory that the employee has requested the laboratory to conduct the confirmatory retest or transfer the sample to another qualified laboratory licensed to conduct the confirmatory retest. The original testing laboratory will ensure the control and custody procedures are followed during transfer of the sample to the other laboratory. In accordance with Minn. Stat. § 181.953, subd. 3, the laboratory is required to maintain all samples testing positive for a period of six months. The confirmatory retest will use the same drug, cannabis and/or alcohol threshold detection levels as used in the original confirmatory test.

If the confirmatory retest does not confirm the original positive test result, no adverse personnel action based on the original confirmatory test will be taken against the employee, and the employee will be reinstated with any lost wages or salary for time lost pending the outcome of the confirmatory retest result.

Suspensions:

Employees may be suspended from work without pay pending the receipt of test results if Housing Authority believes that doing so is consistent with a safe workplace. Any employee who has been suspended, and who receives a negative result on the drug, alcohol or cannabis test, will be reinstated with full back pay. Positive result suspensions may last up until an employee can provide a negative confirmatory test result.

Confidentiality:

Test result reports and other information acquired in the testing process are private and confidential information except where permitted or required by law.

How Test Are Conducted:

- Authorized Laboratory. An authorized laboratory certified, accredited, or licensed to test for drugs, alcohol, and/or cannabis under Minnesota law will conduct testing. Testing will be based upon urine and/or blood samples, or any technology deemed appropriate by the testing laboratory.
- Sample Collection. Employees requested or required to take a drug, cannabis and/or alcohol test may be escorted by a manager, supervisor, or other appointed individual to the designated sample collection site. If the designated sample collection site is not open at the time that testing is requested, a sample may be collected by an on-site service.
- Employee Notification Form. An employee who is to be tested for drugs, cannabis and/or alcohol may request a copy of this drug, alcohol, and cannabis testing policy and an opportunity to read it before testing occurs.
- Positive Confirmation Level. Federal DOT along with the Authorized Testing Laboratory in accordance with applicable State and Federal Laws & Regulations set quantity levels which will be mirrored to constitute a positive test via GCMS technology for this policy.

Violation of this drug, alcohol, cannabis free workplace and testing policy may result in discipline up to and including termination.

9. PERSONNEL RECORDS POLICY

Throughout employment, the Housing Authority may ask applicants and employees to supply private or confidential data regarding themselves and/or their employment at the Housing Authority. All such data is collected in order to ensure the efficient operation of the Housing Authority and to make employment decisions and decisions regarding salary, benefits, hours worked, and regarding, hiring, discipline, discharge, promotion, demotion, workplace accommodation, performance evaluation, use and/or accumulation of leave, or other terms and conditions of employment. Such data may be used by the employee's supervisor, the Executive Director, and other Housing Authority employees whose jobs reasonably require access to that data in order to make informed decisions. Unless otherwise directed, any employee or applicant may refuse to provide such data. Such refusal will lead to the decision in question being made without the benefit of the employee's input, and may

result in the denial of a request from an employee, or other determinations that are adverse to the employee or applicant. In addition, the following individuals and entities have a right to access any such data collected by the Housing Authority:

- Supervisors/administrators whose input is necessary in the decision-making process;
- Housing Authority Board;
- Exclusive representative for the subject employee;
- Minnesota Attorney General's office;
- Minnesota Legislative Auditor's office;
- Arbitrator/Hearing Officer;
- State and federal courts;
- State and federal enforcement agencies, including but not limited to the Federal Equal Employment Opportunity Commission, Minnesota Department of Human Rights, and the U.S. Department of Labor;
- Unemployment Division of the Department of Economic Security;
- Law enforcement agencies and prosecutorial authorities;
- Counsel for parties in litigation pursuant to court order;
- Person/entities whom an employee authorizes to receive the data; and
- Any other person or entity authorized by state or federal law.

The Housing Authority maintains a personnel record on each employee that includes all information relevant to his/her employment, including but not limited to, employment applications, evaluations, leave records, pay, benefits, etc. The Housing Authority's collection, use, and disclosure of all such records, including disclosure to employees who are the subject of the data collected, will be consistent with the Minnesota Government Data Practices Act and all other applicable laws.

In order to assure that employee records are current, employees shall notify their supervisor promptly of the following changes:

- a. Name
- b. Address
- c. Telephone
- d. Marital Status
- e. Dependents
- f. Awards and Honors
- g. Beneficiaries
- h. Person to be notified in case of emergency
- i. Additional education and training

The supervisor must notify the Executive Director upon receiving such notice. These changes may affect employee benefits including but not limited to pension, life insurance, and Social Security.

10. CONFIDENTIALITY POLICY

All data collected, received, or maintained by the Housing Authority, including data collected, received, or maintained by Housing Authority employees are subject to the Minnesota Government Data Practices Act. All employees must exercise extreme care to maintain data in accordance with the requirements of that law. As a general matter, internal matters shall not be discussed in the presence of unauthorized persons within the Housing Authority or with anyone outside of the Housing Authority (including, but not limited to, employees' families, employees' friends, clients, landlords, contractors and other associates the Housing Authority conducts business with).

Any employee found to have violated this Policy may be subject to disciplinary action, up to and including immediate termination.

11. INCLEMENT WEATHER POLICY

It is a policy of the Housing Authority to be open for business despite snow or other inclement weather conditions unless otherwise determined by the Executive Director or his/her designee.

Employees are not expected to endanger themselves by driving to work during adverse weather conditions. Attendance during bad weather should be a matter of individual judgment based on safety and availability of alternative modes of transportation (e.g., carpooling, public transportation). During inclement weather, some travel delays are to be expected.

Any decision to delay opening of the office or to close for the day will be communicated to employees by their supervisors. Generally, if no announcement is made by 6:00 a.m., the office will be open at the usual time.

The following policy applies with regard to the opening and closing of the Housing Authority due to inclement weather:

- (1) **If there is a delayed opening and an employee arrives by the Housing Authority's specified time:** all employees who report at that specified time will be paid for the entire day (as scheduled).
- (2) **If an employee arrives after the specified delayed opening time:** salaried and hourly employees will be paid from the arrival time through the remainder of the day (as scheduled). The employee may use vacation time, if available, to be paid for the work hours prior to the time of arrival, or may make up the missed hours by working them within the same week with the supervisor's approval.
- (3) **If the employee is unable to come in at all:** salaried and hourly employees may use vacation time, if available, to be paid for the day.
- (4) **If inclement weather begins during the day and there is early dismissal:** all employees present at the time of dismissal will be paid for the remainder of the day (as scheduled).
- (5) **If inclement weather begins and the Housing Authority does not close but**

the employee chooses to leave early: salaried and hourly employees will be paid only through the period that was worked. The salaried or hourly employee may use vacation time, if available, to be paid for the work hours missed or may make up the missed hours by working them within the same week with the supervisor's approval.

(6) If the office is closed all day: all employees scheduled to work will be paid for the day as scheduled.

12. USE OF HOUSING AUTHORITY PROPERTY

The Housing Authority will provide its employees with the equipment, supplies and materials necessary for performance of their assigned jobs. Equipment, vehicles, tools, materials and supplies that belong to the Housing Authority shall not be used or removed from Housing Authority property except in the conduct of Housing Authority business.

Equipment and vehicles assigned to employees shall be maintained and kept in good working condition by the employees. If it is found that the equipment or vehicle is being abused or used in an unsafe manner, the employee will be subject to disciplinary action, up to and including immediate termination. If it is determined that the employee is negligent in the proper use or storage of tools, equipment, vehicles, materials or supplies, or if they are abused, misplaced or stolen, the employee may be required to repair or replace them and/or the employee will be subject to discipline, up to and including immediate termination.

Employees are required to return all Housing Authority equipment, vehicles, supplies, materials, keys, uniforms, photo identification badges, and other Housing Authority-owned property upon separation from employment. Employees who fail to return said property upon separation from employment will not be considered in good standing upon separation from employment. Employees who are not in good standing upon separation from employment will not receive payment for unused vacation leave upon separation from employment.

13. OPERATION OF HOUSING AUTHORITY VEHICLES

The purpose of this policy is to establish and specify policy on vehicle transportation for Housing Authority officials and employees in the conduct of official Housing Authority business.

Housing Authority owned vehicles may be assigned to an individual employee when the work assignment requires the use of the vehicle. Any employee who operates a Housing Authority vehicle must possess a valid driver's license issued by the State of Minnesota. Employees are required to notify the Housing Authority if their driver's license or insurance is no longer valid and agree to provide an annual copy of their current driver's license and valid auto insurance

verification.

Vehicles owned by the Housing Authority are to be used for official Housing Authority business only. They are not to be used for personal business or pleasure during or outside of working hours. If an employee uses the vehicle for his/her own personal business or pleasure, he/she may be subject to disciplinary action, up to and including immediate termination. Upon prior approval of the Executive Director or his/her designee, employees who are required to respond to emergencies may drive a Housing Authority vehicle to and from their home. No person other than a Housing Authority official or employee shall be authorized to operate a Housing Authority vehicle.

Housing Authority and privately-owned vehicles being operated for Housing Authority business shall be operated in accordance with all safety and legal requirements of the Housing Authority, state and any other jurisdictions in which they are operated. Housing Authority vehicles represent the Housing Authority and are not to be used to advertise (i.e.: bumper stickers) the personal opinions of the operators. Any alterations to the appearance or mechanical function of a Housing Authority vehicle must be approved by the Executive Director.

An employee may be held liable for accidents in which he/she is involved if it is determined that the accident is the result of his/her negligence. The driver of the vehicle and/or person to whom the vehicle is assigned may be held financially responsible for the damages, and may be required to submit to a substance abuse test in accordance with the Drug Free Workplace Policy. An employee will be personally responsible for paying any citation received while operating a Housing Authority vehicle.

If the automobile insurance company advises that an employee who is an authorized operator of a Housing Authority vehicle is a high risk driver, that employee's driving privilege may be suspended until such time as the insurance company determines that his/her driving habits are sufficiently improved as evidenced by the Department of Motor Vehicle records.

A. Vehicle Management

It is the policy of the Housing Authority to provide for central management of its fleet vehicles and motorized equipment, including its purchase, ownership, maintenance and repair, replacement and disposal. The management of the vehicle fleet shall be under the direction of the Executive Director. The maintenance and disposal of the vehicle shall coincide with the current procurement policies and procedures.

B. Use of Privately-Owned Vehicles for Official Housing Authority Business

Use of privately-owned vehicles for Housing Authority business must be authorized by the supervisor. Employees who are not assigned an individual vehicle may be reimbursed at the current Housing Authority mileage rate, which is equal to the current Internal Revenue Service (IRS) mileage reimbursement. Each month, the employee is to document their business mileage by completing a Mileage Expense Form in order to receive reimbursement.

All employees who are authorized to use their personal vehicle for business must possess a valid driver's license issued by the State of Minnesota, and must carry auto insurance within the legal

limits as required by the State of Minnesota on an annual basis. When a Housing Authority employee uses a private vehicle for authorized business purposes, their personal auto insurance policy liability coverage on the vehicle is primary unless otherwise provided by law. Employees are required to notify the Housing Authority if their driver's license or insurance is no longer valid and agree to provide an annual copy of their current driver's license and valid auto insurance verification.

14. BUSINESS TRAVEL AND REIMBURSEMENT POLICY

It is Housing Authority policy to provide for the most efficient means of transportation for Housing Authority business at the least cost, and to provide for the accurate accounting of travel expenses and for their timely reimbursement.

All requests for travel and reimbursement must be submitted to the Employee's supervisor. The Executive Director or his/her designee will review all employees' travel accounts approved by the supervisor.

The Executive Director or his/her designee must authorize the means of transportation prior to the trip. The means of transportation to be used should be based on cost and convenience. Possible choices are: Housing Authority vehicles, personal vehicles, aircraft or mass transit.

A. Allowable Travel Expenditures:

The Executive Director has sole discretion to approve or deny all requests for business related travel and reimbursement made by employees other than the Executive Director. The Board of Commissioners has the sole discretion to approve or deny all requests for business related travel and reimbursement made by the Executive Director. In general, the following will be approved:

- (1) Registration fees for conferences, conventions, and seminars
- (2) Transportation fares – airplane, train, subway, bus, taxi, ferry, automobile mileage
- (3) Parking fees
- (4) Lodging
- (5) Meals, within limits established by the Housing Authority
- (6) Tips and gratuities, within limits established by the Housing Authority
- (7) Telephone charges when conducting Housing Authority business
- (8) Internet service, if not provided for free
- (9) Travel insurance premiums

B. Non-Allowable Expenditures:

- (1) Entertainment, including (but not limited to) alcohol expenses.

Employees must follow the Housing Authority's established procedures in order for travel advances or reimbursements to be approved. In cases where Housing Authority travel is using federal funds, the employee must attempt to receive government rates or the most reasonable rates for accommodations.

C. Reimbursement Policies

- (1) **Housing Authority Vehicles** – All vehicle expenses including gas, oil, etc., that are incurred while using a Housing Authority vehicle must be documented with a receipt.
- (2) **Personal Vehicles** – Employees using personal vehicles for Housing Authority business will be reimbursed at the current IRS rate for travel. The starting destination, ending destination and number of round trip miles driven must be entered on the “Mileage Expense Form.” Commuting from home to an employee’s designated work site is never business travel and mileage is not reimbursed.

Carpooling for business related travel is required whenever possible, unless the Executive Director gives prior approval to not carpool.

In the case of an accident while on Housing Authority business, the employee should give the other driver or law enforcement authority his/her name, driver’s license number and insurance information. The employee must also obtain the following information from the other driver involved in the accident:

1. Name of the other driver;
2. Driver’s license number;
3. License plate number of the other vehicle; and
4. Insurance company and policy number.

Employees must report any accident occurring during business travel to the Executive Director as soon as possible but no later than forty-eight (48) hours after the accident.

The following additional rules also apply to business related travel:

- (1) **Air, Bus, or Train Travel** – The fare shall not exceed the regular tourist or “coach” fare (except when no tourist accommodations are available) and must be substantiated by a copy of the paid ticket.
- (2) **Rental Vehicles** – Rental cars may be used only when the Executive Director gives prior authorization.
- (3) **Employees Traveling Together** – No employee will be reimbursed for mileage when transported by another employee.
- (4) **Lodging** – Whenever possible, lodging will be paid directly by the Housing Authority or will be reimbursed to the employee or Commissioner for actual expenses, if the employee or Commissioner directly books the lodging. Receipts must be submitted for lodging reimbursement. In order for lodging costs to be reimbursed, the lodging choice must be approved by the Executive Director before reservations are made.
- (5) **Overnight Travel: Meals & Miscellaneous Expenses** – The Housing

Authority provides a flat per diem rate to Commissioners and employees for meals and miscellaneous expenses while in overnight travel status. Employees and Commissioners traveling on business overnight will be provided a per diem for other incidental expenses based on the IRS rate for the specific town to which the employee or Commissioner is traveling. The per diem will be used to cover the costs of meals and tips, but it does not include the costs of lodging, cab fares, parking, mileage or telephone calls.

- a. For the first and last day of overnight travel, the per diem rate will be discounted by 25%. If all meals are included in any other fees paid by the Housing Authority including but not limited to conference registration fees, no per diem will be paid. If some meals are included in any other fees paid by the Housing Authority including but not limited to conference registration fees, the per diem rate will be discounted an additional 40% for each day which includes meals paid for in other fees.
- b. Receipts must be submitted for reimbursement for cab fares and parking fees.

(6) Spouses/Guests – Arrangements for the accompaniment of spouses or other guests must be made in advance with the approving authority. The Housing Authority will not pay for transportation, meals or entertainment of spouses or guests.

(7) Employee Behavior – Employees traveling on Housing Authority business are representatives of the Housing Authority and are expected to maintain a high level of professionalism and follow all of the Housing Authority’s policies and procedures while on business travel.

15. ELECTRONIC COMMUNICATIONS AND COMPUTER USE POLICY

Information technology offers a wealth of resources for employees and agents of the Housing Authority. Like any tool, these technologies may be misused. Proper use of the Housing Authority's information technology is the sole responsibility of the individual user. Misuse of the Housing Authority's information technology systems may lead to revocation of the employee or agent's access to technology and possible discipline, including suspension, reprimand, termination, and/or criminal prosecution.

A. SCOPE

This Policy shall apply to all users of the Housing Authority's information technology systems, including but not limited to employees, agents, administrators, board members, and volunteers. This Policy shall apply to the use of, and access to, the Housing Authority's information technology systems from any location and by any means. This policy shall apply to any and all users of the Housing Authority network or Internet access, regardless of the ownership of the device used to connect to the Housing Authority network. This policy specifically applies

to all employee-owned mobile electronic devices that access the Housing Authority's information technology systems, including but not limited to, cellular phones, tablets, PDAs, and laptops.

The Housing Authority's information technology systems (also referred to as the "Housing Authority system" or "Housing Authority network") entail all mechanical and electronic systems owned or leased by the Housing Authority that create, store, modify, and transmit information, including, but not limited to, stationary and portable computers, networks, Internet access, cell phones, and voice messaging systems. The Housing Authority's information technology systems also entail all information, data, and files, created, stored, modified, or transmitted by Housing Authority information technology systems.

B. SYSTEMS / PROPERTY RIGHTS

The information, communication, processing, and storage resources provided by the Housing Authority are the sole property of the Housing Authority. Files, data, and other communication created, originating from, or stored on the Housing Authority's hardware, software, computer disks, or other electronic systems are also the property of the Housing Authority. Equipment and software leased from others by the Housing Authority are considered the Housing Authority's property for the purposes of this Policy. The Housing Authority's ownership and control over its systems shall apply regardless of how and where a user accesses the Housing Authority's systems.

All work products created through the use of the Housing Authority system are the property of the Housing Authority. Any materials developed, composed, sent, or received using Housing Authority equipment, resources, or the Housing Authority network will remain the property of the Housing Authority.

C. PRIVACY

The use of the Housing Authority system is not private. Internet access and messages sent are subject to logging, monitoring, interception, and forwarding, which is beyond the control of the user. Although logs and e-mail messages may appear to the user to have been deleted, the message or the data that it contained may nevertheless continue to exist in the network in which the resources are connected. Stored logs, e-mail messages and other computerized data are discoverable documents, which may be exchanged in litigation. The content of logs or e-mail messages may subject the user to civil liability, discipline, and/or criminal sanctions.

The Housing Authority can and will inspect information and files stored, processed, or communicated by or through its information systems without further notice to its users. Users of the Housing Authority's information technology systems shall have no expectation of privacy related to such use.

Users are advised that all data stored or transmitted over the Housing Authority's network, including the data's use, retention, and disclosure, are or may be subject to Minnesota Statutes Chapter 13, the Minnesota Government Data Practices Act ("MGDPA"). Employees will be

subject to discipline, up to and including termination of their employment, for violations of the MGDPA.

Users are placed on notice that the forwarding of private or confidential data to home e-mail addresses or automatic forwarding of Housing Authority e-mail is not permitted. All users shall exercise care to ensure such data is only sent to appropriate persons. "Reply All" should be used sparingly. All e-mails should be "single subject" to ensure that private data on more than one person is not contained in the same e-mail.

D. CONTENT AND EXPECTATION OF CAREFUL USE

Users shall be responsible for the content of all text, audio, and video created, viewed, transmitted, downloaded, or otherwise accessed using the Housing Authority system. Messages shall contain the user's identity, and should be written with the same professional manner as any hard-copy correspondence.

The Housing Authority provides telephone, fax, Internet access, and e-mail to speedily conduct the business of the organization. Use of the Housing Authority systems will be granted by supervisors with regard to job function. Once given access, users are expected to use these systems in a responsible manner at all times. All usage must withstand public scrutiny without embarrassment to the Housing Authority.

Housing Authority employees should use reasonable consideration and respect for Housing Authority clients, vendors, Commissioners and employees when placing or accepting phone calls, text messages, or any other electronic communications. These actions should be avoided while in meetings or when dealing with clients, except in situations where there is an emergency.

E. UNACCEPTABLE USE

All Housing Authority information technology systems must be used only for Housing Authority business-related purposes.

Limited Personal Use Exception for Employees: Minimal personal use by employees during non-duty hours may be authorized. Such use must comply with all other requirements of Housing Authority policies and must not interfere with workplace productivity.

Users shall not use the Housing Authority's information technology systems, including, but not limited to, computers, equipment, internal or external e-mail, or Internet access for any of the following purposes:

- To access, upload, download, transmit, receive or distribute pornographic, obscene, abusive, or sexually explicit materials, or materials containing unclothed or partially clothed people unless in an official capacity while investigating crimes.
- To transmit or receive obscene, abusive, or sexually explicit language or profanity

unless in an official capacity while investigating crimes.

- To violate any local, state or federal law or engage in any type of illegal activity.
- To vandalize, damage or disable the property of another person or organization, including but not limited to property owned by the Housing Authority.
- To access the materials, information or files of another person or organization without permission.
- To violate any applicable state, federal and international copyright, trademark or intellectual property laws and regulations or otherwise use another person or organization's property without prior approval or proper attribution consistent with copyright laws, including unauthorized downloading or exchanging of pirated or otherwise unlawful software or copying software to or from any Housing Authority computer.
- To engage in any form of gambling.
- To engage in any type of harassment or discrimination, including but not limited to sexual harassment and harassment or discrimination based upon race, gender, sexual orientation, religion, national origin, marital status, status with respect to public assistance, disability or any other type of harassment or discrimination prohibited by law and Housing Authority policy.
- To engage in any type of commercial enterprise unrelated to the specific purposes and needs of the Housing Authority.
- To engage in any form of solicitation without the express prior written consent of the Executive Director or the Housing Authority Board.
- To promote any political or private causes, or other activities that are not related to the business purpose of the Housing Authority.
- To enter into financial or contractual obligations without the express prior written consent of the Housing Authority Board. Any financial or contractual obligation entered into by a user without the express prior written consent of the Housing Authority Board shall be the sole responsibility of the user.
- To review or access any materials related to, obtaining, or using any controlled substances or products such as alcohol which may not lawfully be used or consumed by minors, without the express prior written permission of the Executive Director.
- To advocate or access information advocating any type of unlawful violence, vandalism, or illegal activity, without the express prior written consent of the Executive Director.

- For employees to engage in job search activities for positions outside of the Housing Authority.
- To defame another or in any manner that harms the reputation of the Housing Authority.
- To engage downloading or uploading personal photographs under any circumstances.
- To engage in personal activities, including but not limited to, shopping, banking, accessing social media, social networking, personal e-mail, and any other personal use except on a **minimal basis** during designated lunch periods and break periods.
- To download any computer programs or applications onto the Housing Authority system without permission from the Executive Director.

Employees operating a Housing Authority owned vehicle or a private vehicle for Housing Authority business are prohibited from using cell phones while operating such vehicles. If an employee finds it necessary to use a cell phone while operating a Housing Authority owned vehicle or a private vehicle utilized for Housing Authority business, the employee must pull over and park the vehicle in a safe location prior to doing so.

The use of Housing Authority systems shall be avoided while operating a Housing Authority vehicle or personal vehicle to conduct Housing Authority business. Employees are prohibited from using any equipment, including cellular phones and iPads/tablets to send or read text messages or emails while driving. Employees must adhere to all federal, state, and local laws and guidelines regarding the use of such devices at all times.

F. ACCESS RULES

Users shall not use any means or protocols of accessing Housing Authority information technology systems other than the means of access or protocols that are supplied and made available to the user by the Housing Authority or that are authorized in writing by the Executive Director or his/her designee.

Users shall only use software, including but not limited to e-mail applications and web browsers that are supplied by the Housing Authority.

Employee users shall not install hardware or software on the Housing Authority's systems without the express prior written permission of the Executive Director or his/her designee.

Users shall not access, modify, or delete the files belonging to other users. Users shall use only the usernames provided by the Housing Authority.

Users may not forward e-mail chain letters or personal, non-business e-mails.

All use of the computers, equipment and Internet access of the Housing Authority shall be

in compliance with all other Housing Authority policies.

Employee access shall be subject to such additional rules, limitations, and conditions as may be set by their individual supervisor(s) and/or the Executive Director.

G. SECURITY

Every user must maintain the security of the Housing Authority information technology systems. Users shall not divulge passwords or security protocols to anyone without the written authorization of the Executive Director. Users shall not permit others to use their passwords or access to the Housing Authority's information technology systems.

E-mail communications and analog cellular telephones are vulnerable to interception. Private or confidential information shall not be transmitted via e-mail without the permission of the Executive Director. Private or confidential information shall not be transmitted using analog cellular phones.

Users who inadvertently receive or access inappropriate, unsolicited e-mails or other materials that are prohibited by law or this Policy shall report the receipt or access of such material to the Executive Director within one business day.

H. PASSWORDS

It is the Housing Authority's goal to provide a secure environment for all Housing Authority data, hardware, and software programs. To produce security for our computerized environments all employees must maintain password protocols and procedures, as follows:

- a. Passwords must be maintained by individual employees. The Housing Authority will assign initial passwords when the employee is activated to the system. The first time a new employee signs onto the system, he or she shall change their password from the initial password to his or her own unique password.
- b. Employees should be aware that even though they have a confidential password, this does not mean that the data contained on or transferred over the Housing Authority network is the property of the employee. The Housing Authority retains the right to access any employee's password or other electronic data contained on the Housing Authority network at any time, with or without notice or suspicion, and for any reason.
- c. Employees are responsible for the security of their passwords.
- d. Passwords that are obvious, such as nicknames, dates of birth, names of family members or pets, or hobbies shall not be used.
- e. Passwords must not be shared with another person without approval of the Executive Director. The only exception should be for testing by IT staff to resolve problems. If a password is shared for this purpose, it shall be changed by the employee when the testing is completed.
- f. The Housing Authority or system software may require the changing of passwords on a periodic basis and may specify a minimum length and format.

I. ENFORCEMENT

Violations of this policy may result in discipline, up to and including immediate termination. Additionally, violations of this policy may subject the violator to criminal prosecution under federal and/or state criminal and civil liability. The Housing Authority reserves the right to limit or remove any user's access to the Housing Authority's information technology systems at any time for any reason.

J. DISCLAIMER / USER LIABILITY

While the Housing Authority has adopted and shall enforce this Policy to the extent practicable, it does not have the resources or technical capability to ensure complete compliance by its users, who shall be solely and individually responsible for following the terms of this Policy.

The Housing Authority shall not assume and hereby expressly disclaims liability for the misuse of its information technology systems, including but not limited to Internet access, which violates this Policy or any law.

The Housing Authority expressly disclaims any liability resulting from any of the following:

- Financial obligations resulting from the use of the Housing Authority accounts to access the Internet or any other financial obligation entered into on behalf of the Housing Authority by an unauthorized individual.
- Damage to property used to access Housing Authority computers, networks, equipment or online resources.
- Information received by users through Housing Authority computers, equipment, online resources, or Networks, including information received from other networks and systems maintained by other organizations, including but not limited to the State of Minnesota.
- Damages, injuries, or improper communications resulting from contact between individuals, including agents, through the Internet, e-mail, or use of Housing Authority equipment, computers, or systems.

All users of the Housing Authority's information technology systems must read this policy and agree to abide by the terms of the policy as indicated by their signature on the Receipt for Electronic Communications and Computer Use Policy and for Social Media Policy. Signed Receipts shall be kept in the employee's personnel file or such other locations as may be designated by the Executive Director.

16. SOCIAL MEDIA POLICY

The Housing Authority recognizes the increasing use of social media as a communication tool.

This Social Media Policy addresses Housing Authority employees' use of social media. For the purpose of this Policy, the Housing Authority considers the term "social media" to include, but not be limited to:

- personal websites;
- web logs ("blogs") or microblogs (e.g., "Twitter");
- "wikis";
- social networking websites (e.g., "Facebook", "MySpace", "LinkedIn");
- online media sharing websites (e.g. "YouTube," "Flickr"); and
- online forums, message boards, or bulletin boards.

The Housing Authority acknowledges that some of its employees may choose to use social media on their own time, using their own computers, cellular phones, and other communications devices, for personal purposes. Housing Authority rules and policies apply to the conduct and communications of Housing Authority employees while using social media just as those rules and policies apply to conduct and communications in any other setting. In addition, Housing Authority employees are prohibited from using social media in any manner that:

1. Violates any federal, state, or local laws or regulations;
2. Violates any Housing Authority policy, rule, standard, or requirement, including *but not limited to the*:
 - a. Harassment, Discrimination, and Retaliation Policy;
 - b. Confidentiality Policy;
 - c. Conflicts of Interest Policy;
 - d. Political Activity Policy; and
 - e. Outside Employment Policy.
3. Disrupts or hinders the Housing Authority's operations;
4. Infringes on any third party rights, including but not limited to intellectual property rights such as copyrights or trademarks;
5. Is defamatory, libelous, or might be construed as harassment or disparagement on the basis of race, color, religion, sex, national origin, age, disability, or any other legally protected status; or
6. Discloses confidential information related to Housing Authority business, residents, employees, or other matters.

Employees are reminded that information (e.g., comments, blog entries, photographs, videos) posted or communicated using social media may often be accessible by virtually anyone with Internet access. This may include other Housing Authority employees, such as supervisors and subordinates, as well as Housing Authority residents. Also, once information is posted or uploaded onto a social media website or network, it can be nearly impossible to completely remove or eliminate. Housing Authority employees are therefore encouraged to use good judgment if they use social media.

Employees are also reminded that, pursuant to the Electronic Communications and Computer Use Policy, they have no expectation of privacy with respect to the use of any Housing Authority owned or

issued computer or electronic communications device.

Use of social media by a Housing Authority employee in violation of this Policy may result in disciplinary action, up to and including immediate termination.

IV. EMPLOYEE RECRUITMENT / HIRING

1. RECRUITMENT AND SELECTION OF EMPLOYEES

All personnel employed by the Housing Authority shall be selected from the files of applications for employment. It is the responsibility of the Board of Commissioners to hire the Executive Director position. It is the responsibility of the Executive Director to hire all other positions.

Persons desiring employment shall file written applications setting forth their qualifications for employment and such other information as may be required.

Pre-employment drug testing and the obtaining of criminal and driving records may be required upon a conditional offer of employment. The outcome of the drug test must prove negative (indicating no substance abuse). Criminal records will be reviewed for prior offenses, with consideration given to the nature of the offense and length of time since the offense occurred. Consideration will be given to the applicant if the offense is more than three (3) years old, or if the offender is currently enrolled in or has completed an Offenders Program. In determining whether an applicant's criminal history disqualifies an applicant from employment, the Housing Authority will consider: (1) the nature and seriousness of the crime or crimes for which the individual was convicted; (2) the relationship of the crime or crimes to the purposes of regulating the position sought by the applicant; and (3) the relationship of the crime or crimes to the ability, capacity, and fitness required to perform the duties and discharge the responsibilities of the position sought by the applicant.

Applicants may be asked to provide specific information, including the time, nature, and number of any criminal convictions, the facts surrounding each offense, how each offense relates to the job sought at the Housing Authority, the length of time between the conviction and the date of the job application, the applicant's employment history before and after any criminal conviction, and a description of the applicant's efforts at rehabilitation, if any. The applicant may also be asked to provide documentary evidence supporting any answer to such request.

In addition, employees will be required to complete and pass all necessary and appropriate background checks, including but not limited to the Kari Koskinen Background Check as set forth under state or federal law.

A. Job Posting

When a position becomes vacant, it will be posted and/or advertised. Such postings and advertisements will contain the following:

- (1) Job title;
- (2) A description of the duties of the vacant position;
- (3) Hiring salary range; and
- (4) Required qualifications.

All posted jobs will be open to current internal employees and external applicants (unless stated for internal applicants only). If a position is only open for internal applicants, internal employee applicants must meet the following conditions in addition to meeting the qualifications of the position:

- (1) Must have completed six (6) months or longer in current Housing Authority position; and
- (2) Must have completed at least one (1) year of employment with the Housing Authority and must have achieved an acceptable evaluation rating on the most recent performance evaluation (as applicable).

Exceptions to the above conditions for internal applicants may be made at the sole discretion of the Executive Director.

2. TYPES OF EMPLOYMENT

Within the Housing Authority, there are three types of employment and one type of volunteer/intern. Each person hired or offered a volunteer opportunity will come under one of the following classifications:

Regular Employees:

An at-will employee hired to fill a full-time position (a minimum Work schedule of 30 hours per week) on a regular basis. Employees in this classification shall receive the benefits as set forth in this Personnel Policy.

Temporary Employees:

An at-will employee hired for a limited period of time, either on a seasonal basis or to fill a specific need at the convenience of the Housing Authority, which requires up to 40 hours per week. Positions in this classification may develop due to special funding or due to additional workload for a limited period. Temporary positions are normally for the duration of six months or less. This classification does not include individuals who work at the Housing Authority pursuant to a contract between the Housing Authority and a temporary agency. Temporary Employees are not eligible for any employee benefits.

Part-Time Employees:

An at-will employee who works less than 30 hours per week on a regular or as needed basis. A part-time employee is not eligible to receive paid holidays, vacation leave, sick leave, or to participate in the Housing Authority's employee retirement or insurance plans.

Volunteer/Intern:

An at-will person who voluntarily offers himself or herself for a service or undertaking without monetary compensation, for the sole purpose of gaining experience while assisting the Housing Authority and its constituents. Volunteers and interns are not "employees" of the Housing Authority. Accordingly, they are not entitled to any benefits described in this Personnel Policy and may not access the grievance procedure described in this Personnel Policy.

If a Housing Authority employee changes from Temporary to Regular status, the employee shall earn benefits specified in this Personnel Policy from the date of the commencement of the Regular position.

Nonexempt employees are employees who are subject to the overtime provisions of the Fair Labor Standards Act (FLSA). Exempt employees are employees who are exempt from the overtime provisions of the FLSA.

3. PROBATIONARY PERIOD

The probationary period is a six (6) month learning period after each employee is hired, rehired, promoted, or transferred to a position in which he/she has not served a probationary period.

The Executive Director may terminate a probationary employee at any time during the probationary period. The employee so terminated shall be notified in writing of the termination and shall not have the right to appeal or file a grievance related to that termination pursuant to this Personnel Policy. Notwithstanding the above, for employees subject to the Minnesota Veterans' Preference Act, the termination notice shall include a description of the reason(s) for the termination, and the Housing Authority shall follow all other provisions of Minnesota Statutes section 197.46 as the law requires.

An employee's completion of the probationary period does not guarantee employment. All employees, including employees who have successfully completed a probationary period, are "at-will" employees. Nothing in this Policy provides, is intended to provide, or should be construed as providing additional rights to employees who complete the probationary period.

4. AUTHORIZED PERSONNEL ON THE JOB SITE

Supervisors may designate certain work areas off-limits to unauthorized personnel. Relatives and friends of employees should limit visits to the job site during the employee's normal working hours. Visits by employee's children, other relatives or other persons to job sites will be allowed during normal business hours only on an occasional basis for a short period of time. Children are prohibited from all facilities other than office areas.

The employee is responsible for informing their relatives and friends to check in at the front desk. Employees will greet their friends/relatives at the front desk. All personnel have a duty to protect confidential information at all times including information in their offices from the view of relatives and friends.

COMPENSATION

1. SALARY INCREASES

Occasionally, at the Housing Authority's sole discretion, a "cost of living" or general Housing Authority-wide increase may be granted at the beginning of the fiscal year based on availability of Housing Authority funds.

2. OVERTIME

Overtime work shall be avoided to the extent possible, but may be required by a supervisor in the interest of efficiency or necessity. Overtime must be requested and approved by the attending supervisor prior to the work being performed. Overtime compensation will be administered in accordance with the Fair Labor Standards Act (FLSA).

Overtime compensation for non-exempt employees

Non-exempt employees will be paid overtime compensation for all hours worked in excess of forty (40) hours per work week at a rate of one and one-half times their regular hourly rate of pay. Non-exempt employees are employees who are not exempt from the provisions of the FLSA with regard to overtime compensation. Only hours actually worked will be considered in calculating the 40 hours for purposes of overtime. Holidays, vacation leave, sick leave, and compensatory time shall not be considered.

The overtime provisions of this policy do not apply to exempt employees. Exempt employees are employees who are exempt from the overtime provisions of the FLSA with regard to overtime compensation. Exempt employees, as defined by the Fair Labor Standards Act, are not entitled to overtime pay. It is anticipated that exempt employees may be required to work more than 40 hours in a week.

Compensatory time off for non-exempt employees

As set forth in this policy, non-exempt employees will be allowed to accrue compensatory time off in lieu of receiving overtime compensation. Compensatory time off is computed at a rate of one and one-half times the hours worked in excess of 40 hours per work week. Only hours actually worked will be considered in calculating the 40 hours worked per work week for purposes of overtime. Holidays, vacation leave, sick leave, and compensatory time shall not be considered.

An employee's accrued compensatory time off shall not exceed 40 hours at any time. Once an employee has accrued 40 hours of compensatory time off, compensation for additional overtime hours worked must be paid in cash, rather than accrued as compensatory time off.

Accrued compensatory time off may be used with prior approval from the employee's supervisor. Upon an employee's separation from the Housing Authority, there will be a pay-out of any accrued and unused compensatory time off at either the employee's average rate of pay over his/her last three years of employment or the employee's final rate of pay, whichever is higher. Exempt employees, as defined by the Fair Labor Standards Act, are not entitled to compensatory time off.

3. ON-CALL PAY

Non-exempt employees in maintenance positions may be assigned to “on-call” duty during hours outside of normal operations for maintenance emergencies. Work assignments during on-call duty may be beyond the normal work performed by the employees, but will be within their capabilities. On-call duty should be assigned on a rotational basis among qualified employees. Employees who are assigned on-call duty must be able to work during the entire on-call assignment.

Employees normally will not be paid for on-call time when waiting to be called, unless otherwise required by law or determined in the sole discretion of the Executive Director or his/her designee. Non-exempt employees responding to a call will be paid ~~for either four (4) hours per call or~~ the actual time worked when responding to a call, ~~whichever is higher~~. Non-exempt employees receiving after hours telephone calls will be credited either fifteen (15) minutes per telephone call or the actual time spent on the telephone call, whichever is higher.

4. PAY PERIODS

Housing Authority employees are paid on a bi-weekly basis. The work period ends the Friday preceding the payday. Payday for bi-weekly paid employees is scheduled on every other Thursday for work done for the two preceding workweeks.

Should a regular payday fall on a holiday, employees will be paid on the last working day before the scheduled payday.

Employees will be given their paycheck by direct deposit to their bank account. Concerns about shortages, overpayment, or deductions should be discussed immediately with the employee’s supervisor.

5. TIME-SHEETS

Misrepresentation and/or falsification of time sheets may result in disciplinary action, up to and including immediate termination.

VI. BENEFITS

1. HEALTH INSURANCE

The Housing Authority offers group health insurance protection to all Regular employees. Eligible employees may also elect insurance coverage for their dependents. The terms of coverage, including the scope of coverage and employee share of any premiums paid for such coverage, may be changed at the Housing Authority's discretion at any time.

In addition, under the provisions of the federal Consolidated Omnibus Budget Reconciliation Act (COBRA), employees who separate from employment with the Housing Authority may be eligible to continue the Housing Authority's group health plan for a period of time after the date of separation. The Executive Director or his/her designee will explain the details of this program with employees at the time of their separation from employment.

2. LONG-TERM DISABILITY INSURANCE

The Housing Authority offers long-term disability insurance for Regular employees, the terms of which, including the scope of coverage and the employee share of any premiums paid for such coverage, may be changed at the Housing Authority's discretion at any time.

3. LIFE INSURANCE

Life insurance coverage under the Housing Authority's group insurance program is available to all Regular employees. The terms of life insurance coverage, including the amount of benefit and the employee share of any premiums paid for such coverage, may be changed at the Housing Authority's sole discretion at any time.

4. RETIREMENT

Each new Regular employee is mandated to participate in the Housing Authority's Housing Agency Retirement Plan. All Regular employees contribute to the Retirement Plan until their employment separation at a rate determined by the Board of Directors.

The Housing Authority also contributes to each eligible employee's plan at a rate determined by the Board of Commissioners. The detailed provisions and benefits of the retirement plan are provided to employees upon plan enrollment.

VII. TIME AWAY

1. HOLIDAYS

Regular employees are granted the following holidays with pay:

- 1) New Year's Day
- 2) Martin Luther King, Jr.'s Birthday
- 3) Presidents' Day
- 4) Memorial Day
- 5) Juneteenth
- 6) Independence Day
- 7) Labor Day
- 8) Veterans' Day
- 9) Thanksgiving Day
- 10) Day after Thanksgiving Day
- 11) Christmas Day

If one of the above holidays occurs on a Saturday, the holiday will be observed on the preceding Friday. When a holiday falls on a Sunday, the holiday will be observed on the following Monday.

2. VACATION LEAVE

The Housing Authority provides Regular employees, including those in their probationary period, vacation benefits to promote rest and relaxation away from work. Employee use of vacation leave is subject to the Housing Authority's scheduling needs and management approval. To ensure efficient functioning of the Housing Authority, it is necessary to limit the number of employees using vacation leave at the same time. Only a limited number of employees will be allowed to take vacation at any one time. The scheduling of vacation leave is based on a first come, first served basis and is the sole discretion of management. Vacation leave requests must be approved by the employee's supervisor in writing in advance of the requested vacation leave. Exceptions to this prior approval requirement are granted on a very limited basis at the sole discretion of management. In addition, management has the authority to require that an employee take a minimum or maximum number of vacation days or hours at any given time.

Employees may accumulate up to a maximum of 240 vacation hours at any given time. Employees will forfeit any vacation leave in excess of the 240 hours permitted to accumulate. Additional pay in lieu of vacation leave time is not permitted. For purposes of accumulating additional vacation leave time, an employee using earned vacation leave, sick leave, ESST leave, compensatory time off, personal leave time or paid holidays is considered to be working.

Employees are encouraged to take advantage of vacation pay. Employees who separate from employment with the Housing Authority in good standing, as the term is defined throughout this policy manual, are entitled to receive pay for any accrued, unused vacation leave.

The following schedule sets forth vacation accrual rates (based on the employee's date of hire) for full-time Regular employees working at least 40 hours per week.

<u>Years of Eligible Service</u>	<u>Hours Accrued Per Month</u>
0-4 years	6.67 hours per month
5-9 years	10 hours per month
10 years	10.67 hours per month
11 years	11.33 hours per month
12 years	12 hours per month
13 years	12.67 hours per month
14 years	13.33 hours per month
15 years	14 hours per month
16 years	14.67 hours per month
17 years	15.33 hours per month
18 years	14 hours per month
19 years	16.67 hours per month
20 years	18.67 hours per month
21 years	18.67 hours per month
22+ years	20 hours per month

Regular employees working at least 30 hours per week but less than 40 hours per week accrue vacation leave in a prorated amount based on the actual number of hours worked by the employee.

3. SICK LEAVE

The following sick leave provisions apply to all Regular Housing Authority employees regardless of their date of hire:

The Housing Authority provides Regular employees, including those in their probationary period, sick leave as set forth in this Personnel Policy. Sick leave may be used for any purpose authorized by law, including but not limited to, an eligible reason under the Earned Sick and Safe Time law, Minnesota Statutes section 181.9413, as amended, and as set forth in subsection 5 below.

When an employee needs to use sick leave, the employee shall:

- a. Report as soon as possible to the employee's immediate supervisor the need to be absent when the need for leave is not foreseeable and identify if the absence is due to an eligible ESST reason or for another purpose authorized by law. When the need for leave is foreseeable, the employee must provide notice at least seven (7) days in advance;
- b. Keep the employee's immediate supervisor informed of such employee's need for continued absence;

b.c. For any absence that exceeds ~~three~~ two consecutive scheduled workdays, upon request by the Executive Director, submit reasonable documentation that leave is being used for an eligible reason. Employees may also be required to provide a medical certificate attesting to the employee's fitness for duty before the employee will be allowed to return to work.

Using or claiming sick leave for a purpose not authorized may be cause for disciplinary action. For the purpose of accumulating additional sick leave, an employee using earned vacation leave, sick leave, compensatory time off, personal leave time or paid holidays is considered to be working. Sick leave generally shall not be earned by an employee during a leave of absence without pay, unless otherwise required by local, state, or federal law.

~~The following specific sick leave provisions apply only to employees hired before May 15, 2015:~~

~~Every full-time Regular employee working 40 hours per week or more, including those in their probationary period, is entitled to earn sick leave with pay at the rate of 8 hours per calendar month of full-time service. Regular employees, including those in their probationary period, working at least 30 hours per week but less than 40 hours per week accrue sick leave in a prorated amount based on the actual number of hours worked by the employee. Sick leave may be banked without limit.~~

~~Part-time employees hired before May 15, 2015 who have accrued sick leave prior to adoption of this Policy may continue to use their previously accrued sick leave, but will no longer accrue any sick leave as of the date this Policy is adopted.~~

~~Upon separation from employment with the Housing Authority, an employee hired before May 15, 2015 shall be paid an amount equal to his/her unused, accrued sick leave.~~

~~The following specific sick leave provisions apply only to employees hired after May 15, 2015:~~

Every full-time Regular employee working 40 hours per week or more, including those in their probationary period, is entitled to earn sick leave with pay at the rate of 8 hours per calendar month of full-time service. Regular employees, including those in their probationary period, working at least 30 hours per week but less than 40 hours per week accrue sick leave in a prorated amount based on the actual number of hours worked by the employee. Sick leave may be banked to a maximum of 960 hours.

Upon separation from employment with the Housing Authority, an employee hired after May 15, 2015 will not be paid for any unused, accrued sick leave.

4. PERSONAL LEAVE TIME

In addition to vacation leave and sick leave, the Housing Authority provides full-time Regular employees working 40 hours per week or more with sixteen (16) hours of paid personal leave time per year in order to promote flexibility with respect to employee time away from work. Regular employees working at least 30 hours per week but less than 40 hours per week accrue personal leave time in a prorated amount based on the actual number of hours worked by the employee. Employee use of personal leave time is subject to the Housing Authority's scheduling

needs and management approval. Incremental use of personal leave time may be permitted under certain circumstances. The Housing Authority retains sole discretion to approve or deny incremental use of personal leave time. Any unused personal leave time will be forfeited by each employee at the end of each year.

5. EARNED SICK AND SAFE TIME LEAVE

Employees who are not eligible for sick leave and who are anticipated to work at least 80 hours in a year for the Housing Authority shall accrue one hour of earned sick and safe time (“ESST”) for every 30 hours worked, up to 48 hours per year.

A. Carryover Year to Year

An employee may carryover up to a maximum of eighty (80) hours of their unused ESST from year to year. Year to year shall be calendar year. The first partial year of employment shall constitute a year for the purposes of this policy.

B. Earning ESST

ESST benefits shall only accrue when an employee is in compensated payroll status. ESST benefits shall not be earned by any employee while in a non-pay status.

C. ESST Use

ESST may be used for:

1. An employee’s own or their family member’s mental or physical illness, injury, or other health condition; need for medical diagnosis, care, or treatment of a mental or physical illness, injury, or health condition; or need for preventative medical or health care.
2. Absence due to domestic abuse, sexual assault, or stalking of the employee or their family member, provided the leave is taken to seek medical care for related physical or psychological injury or disability caused by domestic abuse, sexual assault, or stalking, to obtain services from Victim Services organization, to obtain counseling, to seek relocation, or take steps to secure an existing home, or to receive legal advice, take legal action, or prepare for any related legal proceeding related to or resulting from domestic abuse, sexual assault or stalking.
3. Closure of the employee’s workplace due to weather or a public emergency or an employee’s need to care for a family member whose school or place of care has been closed due to weather or public emergency. However, an employee may not use leave for this purpose if the employee’s preassigned or foreseeable work duties during a public emergency or weather event would require the employee to respond to the public emergency or weather event.

4. Employee’s inability to work or telework because:

- 4.5. The employer prohibits them from working due to potential transmission of illness related to a public emergency; or
- 5.6. They are seeking or awaiting the results of test or diagnosis of communicable disease related to a public emergency due to exposure or at the employer's request.
- 6.7. When a health care professional determines the presence of the employee or family member of the employee in the community would jeopardize the health of others because of exposure to a communicable disease regardless of whether they contracted the disease.
- 7.8. An employee's need to make arrangements for or attend funeral services or a memorial, or address financial or legal matters that arise after the death of a family member.

ESST leave may be taken in 15-minute increments.

D. Definition of Family Member

For ESST, an employee's family member shall include those individuals identified by Minn. Stat. 181.9445 Subd. 7.

Family member includes the following individuals:

(1) an employee's:

- (i) child, foster child, adult child, legal ward, child for whom the employee is legal guardian, or child to whom the employee stands or stood in loco parentis;
- (ii) spouse or registered domestic partner;
- (iii) sibling, stepsibling, or foster sibling;
- (iv) biological, adoptive, or foster parent, stepparent, or a person who stood in loco parentis when the employee was a minor child;
- (v) grandchild, foster grandchild, or stepgrandchild;
- (vi) grandparent or stepgrandparent;
- (vii) a child of a sibling of the employee;
- (viii) a sibling of the parents of the employee; or
- (ix) a child-in-law or sibling-in-law;

(2) any of the family members listed in clause (1) of a spouse or registered domestic partner;

(3) any other individual related by blood or whose close association with the employee is the equivalent of a family relationship; and

(4) up to one individual annually designated by the employee.

E. Request for Leave

Employees shall request ESST leave from their supervisor prior to the start of the workday when leave is not foreseeable, or as soon thereafter as practicable. Requests shall be made by direct contact with the supervisor. When leave is foreseeable, the employee shall request leave as far in advance as possible, at least seven (7) calendar days, and shall schedule appointments to have the least impact on the business of the employer.

F. Documentation

For ESST, the employer may request reasonable documentation that the leave is being used for an ESST eligible reason after leave is used for more than ~~three~~ two consecutive scheduled workdays, consistent with the requirements of Minn. Stat. § 181.9447 Subd. 3.

Upon exhaustion of ESST time, the employer may require medical documentation for any unpaid absences due to illness or injury.

The employer may designate ESST time used for an FMLA qualifying reason as FMLA leave and may request a certification of a health care provider.

For the use of ESST for domestic abuse, sexual assault, stalking, or other qualifying reasons, the employer may request reasonable documentation consistent with the requirements of Minn. Stat. § 181.9447 Subd. 3.

Employees are not required to disclose details relating to domestic abuse, sexual assault, or stalking or the details of an employee's or an employee's family member's medical condition as related to an employee's request to use ESST.

G. Retaliation Prohibited

An employer shall not discharge, discipline, penalize, interfere with, or otherwise retaliate or discriminate against an employee for asserting Earned Sick and Safe Time rights, requesting an Earned Sick and Safe Time absence, or pursuing remedies.

Upon separation from employment, an employee will not be paid for any unused, accrued ESST leave.

6. LEAVE OF ABSENCE WITHOUT PAY

The Executive Director may grant, in writing, any Regular employee one (1) leave of absence without pay for a period not to exceed two (2) months in any calendar year. Granting such leave is within the sole discretion of the Executive Director. No vacation leave, sick leave, holiday

leave, personal leave time, or compensatory time off benefits shall be used or accrued during such unpaid leave of absence. The Housing Authority will not contribute to the employee's insurance premiums during such unpaid leave of absence.

7. ACCOMMODATIONS FOR LACTATING & PREGNANT EMPLOYEES

The Housing Authority will adhere to all federal, state and local laws as they pertain to accommodating nursing mothers, lactating employees, and pregnant employees, including but not limited to, the Patient Protection and Affordable Care Act ("PPACA"), as amended, and Minnesota Statutes section 181.939, as amended.

The Housing Authority will provide a reasonable amount of break time to accommodate an employee's need to express milk, in accordance with and to the extent required by applicable law. The break time may run concurrently with the rest and meal periods already provided to the employee.

To provide privacy, the Housing Authority will make reasonable effort to provide employees with the use of a room or location near the employee's work area, other than a bathroom or a toilet stall, that is shielded from view, free from intrusion by coworkers and the public, and includes access to an electrical outlet.

The Housing Authority will provide reasonable accommodations to employees for health conditions related to pregnancy or childbirth upon request, with the advice of a licensed health care provider or certified doula, unless the accommodation would impose an undue hardship.

The following accommodations will be provided without the need for the advice of a licensed health care provider or certified doula and regardless of any hardship:

- a. more frequent or longer restroom, food, and water breaks;
- b. seating; and
- c. limits on lifting over 20 pounds.

The Housing Authority and the employee shall engage in an interactive process with respect to an employee's request for a reasonable accommodation

8. WORKERS' COMPENSATION

The Housing Authority, as required by state law, carries Workers' Compensation insurance covering all employees. Responsibility for the determination of eligibility of all claims and payment of all eligible claims rests with the insurance company which carries the Workers' Compensation coverage.

Employees must:

- Report all accidents/injuries which occur on the job **immediately** to their supervisor.
- Keep their supervisor informed of their condition.

9. MILITARY LEAVE

State and federal laws provide for and regulate military leave for employees who are called to military service, whether in the National Guard, Reserves or full-time service. Leave from employment to participate in military duty is addressed in federal law in the Uniformed Services Employment and Re-employment Rights Act of 1994 (USERRA) (as amended). Public employees in Minnesota engaged in military service may have additional benefits under Minnesota Statutes. Every Housing Authority employee, whether in the National Guard, Reserves or full-time service will be afforded the benefits entitled to them under federal and state law. These laws may entitle employees to paid or unpaid leave for purposes of military service, including training in the National Guard or Reserves. Employees should contact Human Resources for additional details.

10. JURY LEAVE

Employees who are summoned to court either as a juror or witness must notify their supervisor immediately. Jury leave with regular pay will be granted to an employee for the period of the employee's jury duty service. Although jury leave will be reflected in attendance records, jury leave will not be deducted from the employee's accrued vacation leave, sick leave, ESST leave, or compensatory time off. An employee cannot receive more than the employee's normal take-home pay as a result of taking jury leave pursuant to this policy. Consequently, an employee taking jury leave pursuant to this policy must surrender any compensation for jury duty attendance to the Housing Authority. Reimbursed expenses shall be retained by the employee. When an employee is excused from jury duty during his or her regular working hours, he or she is expected to return to work if practicable.

11. VOTING LEAVE

An employee who is eligible to vote and desires to vote in any election, as defined by Minnesota Statutes section 204C.04, as amended, shall be granted paid leave for the time necessary for the employee to appear at the employee's polling place, cast a ballot, and return to work on the day of that election.

12. BEREAVEMENT LEAVE

Employees are allowed up to three (3) days of paid bereavement leave following a death in the employee's immediate family. Such paid bereavement leave will not be deducted from the employee's accrued vacation leave, sick leave, ESST leave, or compensatory time off.

Immediate family, for the purpose of this section, is defined as an employee's spouse, parent, step-parent, legal guardian, child, step-child, sibling, step-sibling, son-in-law, daughter-in-law, grandparent, or grandchild.

Additional bereavement leave (beyond the three (3) days set forth in this section) may be taken with prior approval of the employee's supervisor. Such additional leave will be deducted from the employee's vacation leave.

This leave is separate from any sick or ESST leave taken for an employee's need to make arrangements for or attend funeral services or a memorial, or address financial or legal matters that arise after the death of a family member.

13. MINNESOTA PAID LEAVE

Effective January 1, 2026, eligible employees may qualify for paid leave pursuant to the Minnesota Paid Leave law, which provides for partial wage replacement to eligible employees. Crosby HRA Housing Authority will deduct the employee's portion of the premiums for Minnesota Paid Leave from the employee's wages. Employees may, but are not required to, use accrued paid leave to supplement or "top off" the partial wage replacement benefits provided under Minnesota Paid Leave. The combined leave benefit of the partial wage replacement and any supplemental paid leave shall not exceed an employee's regular wage or salary.

Eligible employees may apply for Minnesota Paid Leave benefits based on qualifying events for medical care related to pregnancy, childbirth, bonding leave, family care, military family leave, safety leave, or the employee's own serious health condition as set forth in Minnesota law. Paid leave will be administered by the Commissioner of the Department of Employment and Economic Development.

When an employee's need for Minnesota Paid Leave is foreseeable, the employee must provide at least 30 days' advance notice to Crosby HRA Housing Authority. If 30 days' advance notice is not practicable because of a lack of knowledge of approximately when leave will be required to begin, a change in circumstances, or a medical emergency, notice must be given as soon as practicable. Notice must be given in writing to the Executive Director. An employee requesting leave taken intermittently shall provide a schedule of needed workdays off as soon as practicable and must make a reasonable effort to schedule the intermittent leave so as not to disrupt unduly the operations of Crosby HRA Housing Authority. Intermittent leave may be taken in fifteen (15) minute increments. The portion of an employee's leave entitlement which may be taken intermittently is limited to 480 hours per benefit year.

During the period when an employee is receiving Minnesota Paid Leave benefits, Crosby HRA Housing Authority will continue group insurance coverage, including health insurance, for the employee and any dependents as if the employee was not on leave, provided that the employee continues to pay any employee share of the cost of such benefits.

Employees will accrue vacation, sick leave, or ESST only on any portion of the leave period that is paid by Crosby HRA Housing Authority through the use of accrued paid leave. No vacation, sick leave, or ESST will be earned on Minnesota Paid Leave wage replacement benefits.

Minnesota Paid Leave shall run concurrently with Family and Medical Leave Act ("FMLA") leave, Minnesota Pregnancy and Parenting Leave, and any other applicable leaves under Minnesota law when taken for the same qualifying purpose.

14. PARENTAL LEAVE

Pregnancy and Parenting Leave, as provided for in Minnesota Statutes, section 181.941, as amended, grants qualifying employees unpaid leave of up to twelve (12) weeks for: (1) a biological or adoptive parent in conjunction with the birth or adoption of a child; or (2) a female employee for prenatal care, or incapacity due to pregnancy, childbirth, or a related health condition.

The leave shall begin at a time requested by the employee. If leave is taken due to the birth or adoption of a child, the leave must begin within twelve (12) months of the birth or adoption, unless the child remains in the hospital after the mother has been discharged, in which case the leave must begin within twelve (12) months after the child leaves the hospital. Parental Leave ~~is taken simultaneously~~shall run concurrently with FMLA leave and Minnesota Paid Leave. Employees must substitute accrued paid leave for any leave taken under this policy.

When the need for leave under this policy is foreseeable, the employee must provide at least 30 days advance notice. When the need to for leave is not foreseeable, employees should provide notice as soon as practical.

During any leave for which an employee is entitled to benefits or leave under this section, the Housing Authority shall maintain coverage under any group insurance policy, group subscriber contract, or health care plan for the employee and any dependents as if the employee was not on leave, provided, however, that the employee must continue to pay any employee share of the cost of the benefits.

The Housing Authority will not discharge, discipline, penalize, interfere with, or otherwise retaliate or discriminate against an employee for asserting parental leave rights or remedies.

15. SCHOOL CONFERENCE AND ACTIVITIES LEAVE

Employees may take up to a total of 16 hours of unpaid leave during the year to attend school conferences or school-related activities related to the employee's child, provided the conferences or school-related activities cannot be scheduled during nonwork hours. When the leave cannot be scheduled during nonwork hours and the need for the leave is foreseeable, the employee must provide at least seven (7) days' notice of the need for leave and must make reasonable effort to schedule the leave so as not to disrupt unduly the operations of the Housing Authority.

Employees may substitute any accrued paid leave for any part of the leave taken under this policy.

VIII. PERFORMANCE MANAGEMENT AND DEVELOPMENT

1. PERFORMANCE EVALUATIONS

The Housing Authority may, at its sole discretion, require an evaluation of each employee's performance on an annual basis or more often, as determined by the Executive Director. Special evaluations may be necessary for purposes of transfers, promotions, demotions and other purposes. Performance evaluations are not necessarily linked with a transfer, promotion, or demotion and may take place regardless of whether an employee is eligible for a transfer, promotion, etc. Employees will be evaluated based on current performance and the standards and requirements of their respective position.

Performance evaluations shall be filed in each employee's personnel file and may be considered in any personnel actions.

If an employee is absent from work at the time the employee's performance evaluation becomes due, the evaluation may be postponed for up to three (3) months at the Executive Director's sole discretion.

2. PROMOTION

An employee's capacity to assume greater responsibility through promotion is best shown by willingness to learn, an acceptance of additional duties, the ability to get along with others, and the capability to work with enthusiasm, efficiency and dependability.

3. LATERAL TRANSFER

A lateral transfer occurs when an employee's position is changed laterally to another position. The Executive Director may authorize lateral transfers at his or her sole discretion, in order to:

- (1) promote better morale, job performance, and facilitate individual career development;
- (2) match current employees with available work or funds; and
- (3) meet other organizational needs.

In the case of lateral transfers, the employee's pay rate will remain unchanged at the time of transfer. The employee will either remain in the pay range of the former position or be placed in the pay range of the new position, if that pay range is higher than the pay range of the former position, at the sole discretion of the Executive Director. The employee's anniversary date will also be retained.

4. DEMOTION

When an employee is demoted, he/she shall be paid at a rate that is within the pay range for the lower position. The rate within the pay range will be determined by the Executive Director.

5. EMPLOYEE TRAINING

A. Initial Training

All new employees are required to complete an orientation, including information about the Housing Authority in general and the employee's position. Orientation includes a review of the Personnel Policy and any job-specific training. All job-specific training must be provided or coordinated by the employee's supervisor.

B. In-Service Training

When certain training courses are required for a position, from time to time, an employee may be required to successfully complete the training courses in a specified timeframe, as determined by the employee's supervisor, to be eligible for continued employment in his/her current position. The Housing Authority may pay for the training and supplies needed to complete these required courses for up to two attempts with each training opportunity (depending on annual budget allowances for training purposes).

If the employee is unable to successfully complete the required training after these two attempts, he/she will need to successfully complete the required course(s)/certifications at his/her own expense as a term of continued employment. If the employee is unable to successfully complete and pass the required course(s)/certifications, the Housing Authority reserves the right to discipline, demote, or terminate the at-will employee, at its sole discretion.

6. CODE OF CONDUCT

All employees are expected to conduct themselves in a manner that is appropriate to effectively accomplish their work and which provides courteous professional service to the public. Therefore, the Housing Authority requires employees to adhere to the following standards of conduct and ethical behavior while on the job:

- 1) Demonstrate the highest standards of personal integrity, truthfulness, honesty and fortitude in all activities in order to inspire public confidence and trust in public institutions.
- 2) Serve in a way that the employee does not realize undue personal gain from the performance of the employee's official duties.
- 3) Avoid any interest or activity in conflict with performing official duties.
- 4) Eliminate all forms of illegal discrimination, fraud and mismanagement of public funds, and support colleagues if they are experiencing difficulty because of their efforts to correct such discrimination, fraud, mismanagement or abuse.
- 5) Serve the public with respect, concern, courtesy and responsiveness, recognizing that service to the public is beyond service to oneself.
- 6) Strive for personal professional excellence and encourage the professional development of their associates and those seeking to enter the field of public service.
- 7) Approach the organization and its operational duties with a positive attitude and constructively support open communication, creativity, dedication and compassion.
- 8) Respect and protect the privileged information to which they have access in the course of official duties.
- 9) Exercise whatever discretionary authority they have under law to promote the public

interest.

- 10) Accept as a personal duty the responsibility to keep up to date on emerging issues and to administer the public's business with professional competence, fairness, impartiality, efficiency, and effectiveness.

In working at the Housing Authority, it is paramount to demonstrate respect and dignity in services to the public and with coworkers, supervisors, and Commissioners. The following are basic guidelines for fostering respect and dignity:

- 1) Treat people in a professional, courteous manner.
- 2) What might be amusing to one employee may not be amusing to someone else and may be insulting and/or offensive to some other person. THINK before you speak.
- 3) Employees must get along with each other.
- 4) Treat co-workers and clients with respect.
- 5) Explain WHY when possible. People accept things better if they know why an employee wants them to do it. None of us likes to be told, "This is the way it is or this is the way we have always done it."
- 6) Recognize someone when he/she does a good job or shows improvement in an area.
- 7) Avoid gossiping about co-workers.

Appropriate conduct of Housing Authority employees is required to ensure that work at the Housing Authority is safe, productive and pleasant. Disciplinary action, up to and including immediate termination, may be taken against an employee for any violation of this Policy or other reason deemed sufficient by the Housing Authority. In addition, as "at-will" employees, either the Housing Authority or the employees may terminate the employment relationship for any reason or no reason at all.

Examples of the types of inappropriate conduct that could result in the imposition of disciplinary action include, but are not limited to:

- 1) Deliberate or negligent damage to Housing Authority or private property or to the property of other employees while on duty;
- 2) Stealing;
- 3) Fighting;
- 4) Carrying concealed weapons;
- 5) Immoral or indecent conduct;
- 6) Willful interference with work schedules;
- 7) Misrepresentation and/or falsification of records or attendance reports; including but not limited to "buddy punching;"
- 8) Insubordination;
- 9) Misappropriation of Housing Authority property or Housing Authority funds;
- 10) Violation of the Housing Authority's policies, including but not limited to a Personnel Policy;
- 11) Gambling on work time, property or using Housing Authority funds;
- 12) Sleeping on the job;
- 13) Misusing, damaging, taking or refusing to surrender any Housing Authority-owned property, or interfering with or willfully damaging Housing Authority property assigned to any other employee;
- 14) Careless waste of materials and equipment;

- 15) Failing to meet reasonable standards of efficiency and productivity or otherwise unsatisfactory job performance;
- 16) Excessive break time or repeatedly attending to personal affairs on work time;
- 17) Failure to prepare and submit required reports and/or records in a timely manner;
- 18) Falsifying reports or committing fraud with regard to any records;
- 19) Reporting to work in a condition unfit to perform duties including, but not limited to, reporting to work with measurable amounts of illegal drugs, intoxicants, or controlled substances in the employee's system or being under the influence of alcohol or drugs or controlled substances;
- 20) Using tobacco products of any kind in unauthorized areas;
- 21) Violation of established safety rules;
- 22) Carelessness or negligence in performing work;
- 23) Loud boisterous or disruptive activity or horseplay in the workplace;
- 24) Disclosing information in violation of a Personnel Policy or the Minnesota Government Data Practices Act;
- 25) Performing work other than Housing Authority work during working hours;
- 26) Calling in absent after supervisor denial of request for time off;
- 27) Failure to notify supervisor or Executive Director for wrongdoings of co-workers or for violation of any rules, regulations or law;
- 28) Abuse of communications systems (phone, computers, iPads) for personal use;
- 29) Abuse or misuse of the Housing Authority telephone system, computer system or data;
- 30) Disorderly conduct;
- 31) Carelessness or recklessness in operating Housing Authority vehicles or equipment;
- 32) Abusive or threatening language to a supervisor, fellow employee, or the general public;
- 33) Failure or refusal to carry out instructions or assignments;
- 34) Violation of the Housing Authority policy concerning outside employment or secondary employment;
- 35) Unreported absences;
- 36) Absence from the work area without permission or without an excusable reason;
- 37) Failure to report personal injury;
- 38) Failure to report absence properly;
- 39) Poor attendance;
- 40) Tardiness;
- 41) Negligence in the handling of Housing Authority cash, checks or other negotiable instruments;
- 42) Inefficiency or incompetence in performance of duties (including the refusal or inability to obtain required certifications, training or education within specified time frames);
- 43) Any conduct unbecoming of a Housing Authority employee, which might interfere with the successful completion of job duties; or
- 44) Not being truthful or attempting to mislead or evade a direct question or inquiry from any supervisor or the Executive Director.

DISCIPLINE

Housing Authority employees shall be subject to disciplinary action for failing to fulfill their duties and responsibilities, including but not limited to failing to observe the rules and policies

adopted by the Housing Authority Board. It is the policy of the Housing Authority to administer disciplinary penalties without discrimination. Discipline may be in any one of the following forms, depending on the nature and severity of the conduct and the employee's prior discipline history. Nothing in this Policy shall be construed as requiring the Housing Authority to impose discipline in any particular order. Nothing in this Policy shall be interpreted as altering the Housing Authority's employees' status as "at-will" employees or creating any type of "just cause" standard for discipline or termination.

Employees may use the grievance procedure herein with respect to any disciplinary action, except as provided herein.

An employee may be disciplined for conduct including, but not limited to, any conduct that violates any term of a Personnel Policy, including, but not limited to, any inappropriate conduct prohibited by the Code of Conduct. The Executive Director shall oversee and supervise all disciplinary actions. **The Crosby Housing Authority reserves the right to take any disciplinary action at any time.**

Oral Reprimand. An oral (verbal) reprimand may be imposed by the Executive Director for minor violations or incidents. The Executive Director must maintain a record of oral reprimands imposed. An oral reprimand may not be appealed or submitted through the grievance process.

Written Reprimand. A written reprimand may be imposed by the Executive Director. The written reprimand shall state that the employee is being reprimanded for misconduct, and shall describe the misconduct. The employee shall be given a copy of the written reprimand and sign the original acknowledging that he/she has received the reprimand. If the employee refuses to sign the original reprimand, such refusal will be noted on the reprimand. The signature of the employee does not mean that he/she agrees with the written reprimand, only that he/she received it. A copy of the written reprimand shall be placed in the employee's personnel file.

Suspension Without Pay. Prior to the suspension or as soon thereafter as possible, the employee shall be notified in writing of the reason for the suspension and its length. The employee shall sign the original suspension notice acknowledging that he/she received the notice. If the employee refuses to sign the suspension notice, such refusal will be noted on the notice. The signature of the employee does not mean that he/she agrees with the suspension, only that he/she received the notice. A copy of the suspension notice shall be placed in the employee's personnel file.

Termination. The Housing Authority may terminate any employee at any time, for any lawful reason or no reason at all. All terminated employees will be notified in writing of the termination. The employee shall sign the original termination notice acknowledging that he/she has received the notice. If the employee refuses to sign the termination notice, such refusal will be noted on the notice. The signature of the employee does not mean that he/she agrees with the termination, only that he/she received the notice. For employees subject to the Minnesota Veterans' Preference Act, the Housing Authority will provide written notice of the charges against the employee and follow all other provisions of Minnesota Statutes section 197.46 as the law requires.

In addition to the above disciplinary actions, the Housing Authority reserves the right to discipline employees by demoting the employee and/or withholding pay increases. These disciplinary actions may be taken in addition to or in lieu of the other disciplinary actions described above.

Hearing: In any case of suspension, demotion or termination, the employee shall be granted a hearing before the Board if the employee submits a written request for such a hearing to the Executive Director within five (5) working days of notification of the disciplinary action taken. At its sole discretion, the Board may hold the hearing at its next regularly scheduled meeting or any date within thirty (30) days after such meeting. The Board has the sole discretion to conduct the hearing or to appoint a subcommittee to conduct the hearing. If a subcommittee is appointed, it shall make its recommendation to the Board at the next regularly scheduled meeting of the Board following the hearing. The Board's decision is final. In the event the Board overturns a decision of the Executive Director pursuant to this provision, the employee will be reinstated to his/her position with back pay.

For purposes of the Minnesota Government Data Practices Act, the Executive Director's decision in any disciplinary matter constitutes a final disposition of a disciplinary matter, unless the employee files a timely appeal with the Board. In such cases, the Board's decision constitutes the final disposition.

Employment with the Housing Authority may be terminated at the will of either the employee or the Housing Authority, at any time, and for any reason or no reason. Nothing in this Policy changes the at-will nature of employment for all Housing Authority employees.

7. EMPLOYEE GRIEVANCES

It is the policy of the Housing Authority, whenever possible, to prevent the occurrence of grievances and to deal promptly with those that occur. For purposes of this policy, a grievance is defined as a dispute or disagreement as to the interpretation or application of these Personnel Policies.

Employees shall have the right to present grievances either individually or as a group. Grievances shall be presented to the Executive Director, in writing, within five (5) calendar days after the occurrence of the alleged grievance.

The Executive Director shall respond to an employee grievance within fourteen (14) calendar days after receiving the alleged grievance. The decision of the Executive Director is final, except that when the Executive Director is directly involved in the grievance, appeal may be made to the Crosby Housing Authority Board for final decision within fourteen (14) calendar days of the Executive Director's decision. In such an appeal, the Board's decision is final.

In the event that the Executive Director does not respond to the grievance within fourteen (14) calendar days of receipt of the alleged grievance, the grievance shall be considered denied for purposes of the appeal time period discussed above.

In compliance with federal or state law, an employee may also grieve any alleged unsafe act or practice, adverse working conditions, violation of civil rights, and alleged hazardous materials mismanagement.

IX. SAFETY AND SECURITY

1. SAFETY POLICY

It is Housing Authority policy to provide safe working conditions for all employees. The Housing Authority will comply with the Occupational Safety and Health Act (OSHA) and other applicable federal, state, and local safety laws. All Housing Authority employees must promote accident prevention by using all protective equipment supplied to them by the Housing Authority, and by observing the safety regulations of the Housing Authority.

The Housing Authority will periodically provide safety training sessions for employees in an effort to reduce or eliminate the occurrence and recurrence of accidents on the job. The goal of safety training is to educate all employees to be able to (1) recognize hazards to life, health, property and work practices, (2) avoid and eliminate unsafe conditions and (3) properly and safely use inherently hazardous material and equipment.

Additional departmental safety guidelines and procedures may be set forth in separate documents as deemed necessary.

2. REPORTING ACCIDENTS AND INJURIES

If an employee is injured as a result of an accident while on duty, regardless of how minor it may seem, he/she is required to report the injury at once to the employee's supervisor.

Accidents involving Housing Authority-owned equipment must also be reported immediately to the employee's supervisor.

Failure to report an accident or injury could result in the loss of Worker's Compensation benefits as well as needed medical attention.

3. NO EXPECTATION OF PRIVACY

A. No Expectation of Privacy

Housing Authority employees shall have no expectation of privacy in any property or equipment of the Housing Authority, including but not limited to offices, cubicles, desks, files, vehicles, filing cabinets, voice mail, text messages on Housing Authority paid cell phones, PDAs, computers, laptops, mass storage devices, e-mails, electronic media or devices of any kind, or any other type of equipment, property or space provided by the Housing Authority. Any such property or equipment may be accessed by the Housing Authority at any time for any purpose, with or without notice to the employee, and with or without reasonable suspicion.

B. Video Camera Surveillance

The Housing Authority believes that safeguarding the personal welfare of its residents and employees is of paramount importance at all Housing Authority locations. In an effort to discourage those behaviors which threaten personal safety and/or compromise customer service, selective use of video surveillance is employed at Housing Authority locations. The Housing Authority acknowledges that its residents, employees and the surrounding communities need or expect privacy in certain locations. The Housing Authority intends to balance this need with the need for safety of its employees and residents.

This Video Surveillance Policy applies only to audio and video surveillance conducted by the Housing Authority. It does not apply to law enforcement personnel.

In an effort to further the safety and security of Housing Authority employees, residents, and property, the Housing Authority may use video surveillance cameras to monitor any areas where residents and/or employees do not have an expectation of privacy. These include, but are not limited to, resident and employee work areas, hallways, parking lots, outdoor areas, building entrances and exits, lobbies, and waiting areas. Video surveillance cameras may not be used in areas where employees or residents may have a reasonable expectation of privacy, such as restrooms. Video surveillance cameras operated by the Housing Authority shall not be directed or zoomed into the windows of any private residence.

Use of video surveillance cameras may be accompanied by signage indicating use of such cameras. When used, signage shall be appropriate for the location and specific placement of the video surveillance camera. Signage content and placement must be approved by the Housing Authority's Executive Director.

4. WORKPLACE VIOLENCE

The Housing Authority is committed to maintaining a safe environment for its employees, free from violence, threats of violence, harassment, intimidation, and other disruptive behavior. Such behavior will be taken seriously and will not be tolerated. This includes, but is not limited to oral or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm. Individuals who commit such acts may be removed from Housing Authority premises and may be subject to disciplinary action, criminal penalties, or both.

Employees of the Housing Authority should not ignore violent, threatening, harassing,

intimidating, or other disruptive behavior. Except as set forth below for incidents requiring attention by police, if anyone on Housing Authority premises displays such behavior, whether or not he/she is an employee of the Housing Authority, such behavior should be reported immediately to the Executive Director or his/her designee. The Executive Director or his/her designee will promptly investigate the incident and initiate appropriate action.

Threats or assaults that require immediate attention by police should be reported first to police at 911, then the Executive Director or his/her designee.

X. LEAVING EMPLOYMENT

1. LAYOFFS AND REDUCTION IN FORCE

The Executive Director may lay off or reduce the number of personnel in any department for lack of work or lack of budgeted funds. When possible, an advance notice of two (2) calendar weeks from the effective date of separation should be given to each regular employee to be separated from employment due to a lay off or reduction in force. In the event that a lay off or reduction in force becomes necessary, and to the extent possible, consideration will be given to each employee's past performance, and to the organizational needs of the Housing Authority. Nothing in this Policy changes the at-will nature of employment for all Housing Authority employees.

2. RESIGNATION

As at-will employees, all Housing Authority employees may resign at any time, for any reason. In addition, as set forth throughout these Personnel Policies, under the "employment-at-will" relationship, the Housing Authority may terminate an employee's employment, at any time, with or without cause and with or without notice. Any accrued, unused vacation leave will be paid to employees who are in good standing at the time of separation from employment with the Housing Authority. Employees resigning while charges of misconduct are pending or while placed on administrative leave may not be considered as employees in good standing for purposes of payment for accrued, unused vacation time upon resignation.

Unauthorized absence from work for a period of two (2) working days may be considered by the Executive Director as a resignation without such vacation leave payout benefits as well.

Employees will be notified of any benefits which the employee may continue at the employee's own expense after termination of the employment relationship. For employees receiving health insurance during their employment, such health insurance coverage will continue until the end of the month in which the employee's employment terminates. On or before the last day of employment, an employee must return all company owned and provided items.

3. EXIT INTERVIEW

In order to ensure that employees who leave Housing Authority employment are sufficiently informed about their final pay, continuation of benefits under the Consolidated Omnibus Budget Reconciliation Act (COBRA), and their rights and conditions of separation, exit interviews are conducted by the Executive Director or his/her designee.

If an employee leaves the Housing Authority for any reason, he/she may be asked to schedule an exit interview with his/her supervisor. The Housing Authority, however, is not obligated to conduct exit interviews and reserves the right to provide any information regarding such topics by mail or in other written forms.

4. RE-EMPLOYMENT

A former employee of the Housing Authority is eligible for re-employment with the Housing Authority provided his/her previous Housing Authority employment record is satisfactory and provided that the employee left employment in good standing, as defined in this Personnel Policy. All former Housing Authority employees must apply for any desired position and will be considered as applicants. The Housing Authority will contact the former employee's former supervisor(s) as references and may consider all previous employment with the Housing Authority, including past performance reviews and discipline, if any, in considering the application. Except as expressly provided herein, former employees re-employed in this manner are treated as new employees with a new date of hire for purposes of probationary periods, benefits, leave accrual, salary, and all other purposes.

With the exception of employees terminated for disciplinary reasons, former employees who are re-employed by the Housing Authority within one (1) year of their original separation date may be eligible for a continuation of their most recent vacation leave accrual rate. This accrual rate will be based on the re-employed employee's new position and previous years of service with the Housing Authority. Former employees who are re-employed by the Housing Authority within one (1) year of their original separation date may also be eligible for continued retirement benefits as described in the retirement plan.

Crosby Housing and Redevelopment Authority

**RECEIPT FOR PERSONNEL
POLICIES**

By signing below, I acknowledge that I have received a copy of the Housing Authority Personnel Policies, have read and understand the provisions of the Personnel Policies, and will comply with all aspects of the policies as stated. I understand that these policies are intended only as a general reference, and not as a full statement of Housing Authority procedure.

I understand that should I violate the provisions of the Personnel Policies, I am subject to disciplinary action, up to and including immediate termination.

I understand that if I have any questions regarding any of the policies or procedures, I am responsible for seeking clarification from my supervisor or the Executive Director before signing this statement.

I understand that the Personnel Policies and all terms therein, including but not limited to terms relating to wages and benefits, may be changed by the Housing Authority Board, with or without notice to me.

I understand that I may be furnished with amendments to the Personnel Policies. I agree to keep this Personnel Policy Manual in my possession during my employment and to update it whenever provided with materials to do so.

I understand that my employment with the Housing Authority is "at will." I understand that my employment relationship may be terminated at any time and for any reason or no reason by the Housing Authority, or by me, and that the Personnel Policies in no way constitute an employment contract or guarantee of employment for any fixed period.

Employee Name (printed)

Signature

Date

HOUSING AND REDEVELOPMENT AUTHORITY IN AND FOR
THE CITY OF CROSBY
RESOLUTION NO. 2027-03

PERSONNEL POLICY

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby is required to have in place a Personnel 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 amended a Personnel Policy; and

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

1. The Personnel 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: 5/12/2026

CHRA Board Representative

Dated: 5/12/2026

Eric Charpentier, Executive Director



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: Hannah Gangl, Housing Manager
Date: May 1st, 2026
Re: Updated Tenant Selection Plan for Edgewood Apartments – Resolution No. 2027-01

As part of the Management and Occupancy Review this year and new HOTMA requirements, we are required to update our Edgewood Tenant Selection Plan to be in compliance with updated HUD regulations.

Items that needed to be updated or modified included:

- Asset limitations for new admissions.
- Asset limitations for annual and interim reexaminations.
- Policy for de minimis errors in income determinations.
- General hardship exemptions for health/medical care expenses & reasonable attendance care & auxiliary apparatus expenses.
- Phased-in relief for hardship exemptions for health/medical care expenses & reasonable attendance care & auxiliary apparatus expenses.
- Hardship exemptions to continue childcare expense hardship.
- Self-certification of net family assets equal to or less than \$50,000 (adjusted annually).
- Interim Reexaminations – Decreases in adjusted income, increased in adjusted income, and reporting changes and effective dates.
- Revocation of consent forms.
- Determination of family income using other means tested public assistance, i.e. “Safe Harbor”.
- Enterprise Income Verification (EIV) usage.

Action Requested: Adopt Resolution No. 2027-01, Approval of the updated Tenant Selection Plan for Edgewood, as presented.

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CROSBY HOUSING & REDEVELOPMENT AUTHORITY (CHRA)
EDGEWOOD APARTMENTS – TENANT SELECTION PLAN/SCREENING CRITERIA
Project Type: Section 8 New Construction; Elderly/Disabled
Last Updated: July 2023

APPLICATION PROCESS

Initial applications (also referred to as pre-applications) are available at the office, on the agency website at www.crosbyhra.org, and may also be mailed, faxed, or emailed upon request. Completed initial applications may be mailed, faxed, emailed, left in the drop box, or submitted in person at the office located at 300 3rd Ave NE, Crosby, MN. Initial applications will be date and time stamped upon receipt. Incomplete pre-applications will not be accepted and will be returned to the applicant for completion.

WAITING LIST

After reviewing the initial application and a preliminary review of public records, CHRA staff will make a determination of eligibility and waiting list preference categories based on information supplied on the pre-application.

Applicants may report changes in their pre-application status including changes in household composition, income, or preference factors at any time. CHRA staff will annotate the application and update the applicant's placement on the waiting list. Persons with disabilities who require a reasonable accommodation in completing an application may contact the CHRA to make special arrangements.

Recipients of tenant based rental assistance, including Housing Choice Vouchers (HCV) will not be denied access or discriminated against on the basis of this assistance.

WAITING LIST OPENING & CLOSING

Closing of the waiting list will occur when there more than 2.5 the number of applicants waiting for a specific unit size as the total number of units of that size. Closing will be announced with a public notice and posting on the CHRA website. The public notice will state the date the waiting list will be closed and for what bedroom sizes. The public notice will be published in a local newspaper of general circulation and also by any available minority media.

Opening of the waiting list will be announced with a public and posting on the HRA website. The public notice will state that applications will again be accepted, identify any limitations, and state where, when, and how to apply. The public notice will be published in a local newspaper of general circulation and also by any available minority media.

WAITING LIST PREFERENCES

Waiting list preference will be given to elderly and disabled households (20 points). If there are no elderly or disabled households on the list, preference will then be given to near-elderly applicants (15 points). If there are no near-elderly households on the waiting list, units will be offered to local applicants (10 points) who qualify for the appropriate bedroom size. Local applicants are defined as applicants already living in Crow Wing County, Minnesota, or moving to Crow Wing County for verified employment or to receive medical treatment.

INCOME LIMITS & INCOME TARGETING

At least 40% of newly admitted households will be at or below 30% of the area median income. The waiting list will be sorted so that extremely low and very low-income households are ranked above households with higher income. Very low-income households are those whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size. Extremely low-income households are those whose annual income does not exceed the federal poverty level or 30 percent of the median income for the area. Updated income limits are collected annually from HUD and are posted in the office and on the agency's website.

REJECTION FROM WAITING LIST

If CHRA staff determines the applicant to be ineligible, the applicant will be notified in writing of the specific reason(s) for rejection and offered the opportunity of an informal review of the determination.

APPEAL OF REJECTED APPLICATION

Within 14 days applicants may submit a written response or contact the office to request a meeting to discuss the denial. Applicants may provide information on any mitigating factors such as the circumstances surrounding any negative factors that may be helpful to consider when determining eligibility, including supportive services or other assistance that may alleviate presumed risk. Staff will review all information received and provide a written decision to the applicant within 5 business days. Persons with disabilities have the right to request reasonable accommodations to participate in this process.

GROUNDINGS FOR DENIAL

The CHRA is not required or obligated to assist applicants who:

- Do not meet any one or more of the eligibility criteria;
- Do not supply information or documentation required by the application process;
- Have failed to respond to a written request for information or a request to declare their continued interest in the program;
- Have a history of not meeting financial obligations, especially rent;
- Do not have the ability to maintain (with assistance) their housing in a decent and safe condition where such habits could adversely affect the health, safety or welfare of other tenants;
- Have a history of criminal activity (convictions) by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety or well-being of other tenants or staff or cause damage to the property;
- Have a history of disturbing neighbors or destruction of property;
- Currently owes rent or other amounts to any Housing Authority in connection with their Public Housing or Housing Choice/Section 8 Voucher programs;
- Have committed fraud, bribery or any other corruption in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from;
- Were evicted from assisted housing within three years of the projected date of admission because of drug-related criminal activity involving the personal use or possession for personal use;
- Were evicted from assisted housing within five years of the projected date of admission because of drug-related criminal activity involving the illegal manufacture, sale, distribution, or possession with the intent

to manufacture, sell, distribute a controlled substance as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. 802;

- Are illegally using a controlled substance or are abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. The CHRA may waive this requirement if:
 - The person demonstrates to the CHRA's satisfaction that the person is no longer engaging in drug-related criminal activity or abuse of alcohol;
 - Has successfully completed a supervised drug or alcohol rehabilitation program;
 - Has otherwise been rehabilitated successfully; or
 - Is participating in a supervised drug or alcohol rehabilitation program.
- Have engaged in or threatened abusive or violent behavior towards any CHRA staff or residents;
- Have a household member who has ever been evicted from public housing;
- Have a household member who has been terminated under the certificate or voucher program;
- Have net family assets that exceed \$100,000 (adjusted annually for inflation);
- Have a present ownership interest in, a legal right to reside in, and the effective legal authority to sell the real property that is suitable for occupancy by the family as a residence;
- **Denied for Life:** If any household member has been convicted of manufacturing or producing methamphetamine in a public housing development or in a Section 8 assisted property;
- **Denied for Life:** Has a lifetime registration under a State sex offender registration program.

APPLICATION FOR AVAILABLE UNIT

When a household reaches the top of the waiting list and a unit is becoming available, the household will be invited to an interview and the verification process will begin.

The household's waiting list preference will be verified first and if the household no longer qualifies to be at the top of the list, the household's name will be returned to the appropriate spot on the waiting list.

Once the preference has been verified, the household will complete a full application, present social security number information, citizenship/eligible immigrant information, and sign the consent for release of Information and other verification forms.

Applicants will be evaluated to determine whether, based on their recent behavior, such behavior could reasonably be expected to result in noncompliance with the lease. The CHRA will look at past conduct as an indicator of future conduct. Emphasis will be placed on whether an applicant's admission could reasonably be expected to have a detrimental effect on the development environment, other tenants, CHRA employees, or other people residing in the immediate vicinity of the property. Applicants will be denied admission if they fail to meet the tenant selection criteria.

The CHRA will consider objective and reasonable aspects of the applicant's background, including the following:

- History of meeting financial obligations, especially rent;
- Ability to maintain (or with assistance would have the ability to maintain) their housing in a decent and safe condition based on living or housekeeping habits and whether such habits could adversely affect the health, safety, or welfare of other tenants;
- History of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety, or well-being of other tenants or staff or cause damage to the property;
- History of disturbing neighbors or destruction of property;

- Having committed fraud in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from; and
- History of abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment by others.
- Declaration and acceptable third-party documentation required to verify citizenship or non-citizen eligible immigration status

A background check that includes housing history and references, credit history, and criminal convictions will be conducted for applicants selected from the waiting list. Only credit history factors related to rental or utility payments will be considered. Review of criminal history is restricted to convictions.

REJECTION OF APPLICATIONS

As with the initial application process, if CHRA staff determines the applicant to be ineligible, the applicant will be notified in writing of the specific reason(s) for rejection and offered the opportunity of an informal review of the determination.

Within 14 days applicants may submit a written response or contact the office to request a meeting to discuss the denial. Applicants may provide information on any mitigating factors such as the circumstances surrounding any negative factors that may be helpful to consider when determining eligibility, including supportive services or other assistance that may alleviate presumed risk. Staff will review all information received and provide a written decision to the applicant within 5 business days. Persons with disabilities have the right to request reasonable accommodations to participate in this process.

ENTERPRISE INCOME VERIFICATION (EIV):

HUD's EIV database will be utilized to run the Existing Tenant Search when processing an application to determine if any applicant household member may be currently residing and/or receiving assistance through another Multifamily Housing or Public and Indian Housing (PIH) location.

Additionally, CHRA will utilize EIV in its entirety for participant families to support income verification, prevent fraud, and ensure program compliance. CHRA will use EIV reports, including but not limited to: Income Discrepancy Report, Income Report, New Hires Report, and Zero Income report. EIV will be used at annual reexaminations, except as noted by Safe Harbor determinations. When Safe Harbor income determinations are used, staff are not required to use the EIV Income Report or New Hires Report at annual reexamination. Additionally, if Safe Harbor verification was used at the last annual reexamination, staff are not required to use the EIV Income Discrepancy Report at the subsequent annual reexamination. CHRA is not required to use EIV during interim reexaminations but may do so at its discretion. CHRA will review the EIV New Hires Report at least quarterly for the remainder of the reexamination cycle following an interim reexamination that decreased rent. For all other tenant families, CHRA will review the EIV New Hires Report monthly.

UNIT TRANSFER POLICY

Unit transfers may occur in emergency conditions posing an immediate threat to life, health or safety of the household; to move a household in need of a unit with accessible features into such a unit or to allow for modernization work to proceed; to address changes in household size or household composition or for other administrative purposes such as correcting unit occupancy standards (i.e. overcrowded or over-housed); to address non-emergency but medically advisable transfers; or other transfers approved by CHRA as being the best resolution to a situation.

Overcrowded: the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides, per the occupancy standards.

Over-housed: the household no longer qualifies for the bedroom size in which they are living based on per the occupancy standards.

A tenant may request a transfer at any time by completing a transfer request form. A meeting with the tenant to better understand the need for transfer and to explore possible alternatives may be necessary. Third-party verification of the need for a transfer may be required.

The CHRA will review the request contact the tenant within ten (10) business days of receipt of the request to schedule a meeting, if one is necessary. The CHRA will grant or deny the transfer request in writing within ten (10) business days of receiving the request or holding the meeting, whichever is later. If the transfer is approved, the household's name will be added to the transfer waiting list. If the transfer is denied, the denial letter will advise the household of their right to utilize the grievance procedure.

OCCUPANCY STANDARDS

Occupancy standards assume that each bedroom will accommodate no more than two (2) persons.

- Two adults will share a bedroom unless related by blood.
- Children of the same sex will share a bedroom.
- Children of the opposite sex, both under the age of five will share a bedroom.
- Adults and children will not be required to share a bedroom.
- Foster adults and/or foster children will not be required to share a bedroom with family members.
- Live-in aides will get a separate bedroom.

In determining bedroom size, the CHRA will include the presence of children to be born to a pregnant woman, children who are in the process of being adopted, children whose custody is being obtained, children who are temporarily away at school, or children who are temporarily in foster-care.

CITIZENSHIP/ELIGIBILITY STATUS

To be eligible each member of the family must be a citizen, national, or a noncitizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a)).

A household shall not be eligible for assistance unless every member of the household residing in the unit is determined to have eligible status, with the exception noted below.

- Despite the ineligibility of one or more family members, a mixed family may still be eligible for partial assistance.
- A family without any eligible members and receiving assistance on June 19, 1995 may be eligible for temporary deferral of termination of assistance.

VERIFICATION OF CITIZENSHIP/IMMIGRATION STATUS:

Family members who claim U.S. citizenship or national status on the citizenship declaration form will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA. Except for persons 62 or older, all noncitizens must sign a verification consent form. Additional documents are required based upon the person's status. A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

Noncitizens that claim eligible immigration status also must present the applicable USCIS document from the list below.

<ul style="list-style-type: none"> • Form I-551 Alien Registration Receipt Card (for permanent resident aliens) • Form I-94 Arrival-Departure Record annotated with one of the following: <ul style="list-style-type: none"> • “Admitted as a Refugee Pursuant to Section 207” • “Section 208” or “Asylum” • “Section 243(h)” or “Deportation stayed by Attorney General” • “Paroled Pursuant to Section 221 (d)(5) of the USCIS” 	<ul style="list-style-type: none"> • Form I-94 Arrival-Departure Record with no annotation accompanied by: <ul style="list-style-type: none"> • A final court decision granting asylum (but only if no appeal is taken); • A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90); • A court decision granting withholding of deportation; or • A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).
<ul style="list-style-type: none"> • Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”. 	<ul style="list-style-type: none"> • Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”.
<ul style="list-style-type: none"> • A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or • Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the <i>Federal Register</i> 	

SOCIAL SECURITY NUMBER DISCLOSURE REQUIREMENTS:

All household members claiming eligible immigration status and requesting assistance, regardless of age, must disclose and document their SSN prior to admission. Note: Applicants who cannot provide SSNs for all household members requesting assistance may retain their position on the waiting list. However, appropriate documentation of a SSN for all household members claiming eligible citizenship status must be provided before the household can be admitted.

Exceptions to this rule are:

- Individuals age 62 or older as of January 31, 2010, whose initial determination of eligibility was begun before January 31, 2010. 2.
- Individuals who do not contend eligible immigration status.
- A child under the age of 6 years added to the applicant household within the 6-month period prior to the household’s date of admission. The household will have a maximum of 90-days after the date of admission to provide the Social Security Number and adequate documentation that the Social Security Number is valid. An additional 90 days may be granted under certain circumstances. If the household does not provide the Social Security Number and adequate documentation to verify the Social Security Number within the prescribed timeframe, HUD requires that the owner/agent terminate tenancy.

Applicants who have not disclosed and/or provided verification of SSNs for all non-exempt household members have 90 days from the date they are first offered an available unit to disclose and/or verify the SSNs. During this 90-day period, the applicant may, at its discretion, retain its place on the waiting list. After 90 days, if the

applicant is unable to disclose and/or verify the SSNs of all non-exempt household members, the applicant should be determined ineligible and removed from the waiting list. The SSN requirements do not apply to persons not claiming eligible immigration status.

FAIR HOUSING/STATEMENT OF NON-DISCRIMINATION

CHRA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

REASONABLE ACCOMMODATION POLICY

It is understood that applicants with disabilities may need a reasonable accommodation in order to take full advantage of the CHRA housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. An applicant requesting an application will also receive a Request for Reasonable Accommodation form upon request. Any notification requesting action by the tenant will include information about requesting a reasonable accommodation. All decisions granting or denying requests for reasonable accommodations will be in writing.

ELIGIBILITY OF STUDENTS

Assistance shall not be provided to any individual who:

- is enrolled as either a part-time or full-time student at an institution of higher education for the purpose of obtaining a degree, certificate, or other program leading to a recognized educational credential;
- is under the age of 24;
- is not married;
- is not a veteran or currently service on active duty in the United States Military;
- does not have a dependent child;
- is not a person with disabilities, as such term is defined in section 3(b)(3)(E) of the United States Housing Act of 1937 (42 U.S.C. 1437a(b)(3)(E)) and was not receiving section 8 assistance as of November 30, 2005;
- is not living with his or her parents who are receiving Section 8 assistance; and
- is not individually eligible to receive Section 8 assistance and has parents (the parents individually or jointly) who are not income eligible to receive Section 8 assistance.

Additionally, assistance may be provided to applicants that are able to demonstrate independence from parents or absence of parents such as those that are:

- orphans, wards of the court, or in foster care at any time when the individual was 13 years of age or older;
- emancipated or in legal guardianship;
- unaccompanied and homeless or at risk of homelessness.

POLICIES FOR APPLYING VIOLENCE AGAINST WOMEN ACT (VAWA) PROTECTIONS

The CHRA will provide notice to tenants of their rights and obligations under VAWA. Status as a victim of domestic violence, dating violence, sexual assault or stalking cannot be a basis for denial of rental assistance or admission if the applicant otherwise qualifies. The CHRA will not assume that any act is a result of abuse covered under VAWA. In order to receive the protections outlined in the VAWA, the applicant/resident must specify that he/she wishes to exercise these protections.

When the CHRA responds to a claim of protected status under the VAWA the owner/agent will request, in writing if appropriate, that an individual document the occurrence of the domestic violence, dating violence, sexual assault or stalking. Owner/Agent must provide victims the option to complete the Certification of Domestic Violence, Dating Violence or Stalking, form HUD – 5382, or, in lieu of the certification form or in addition to it, owners may accept a federal, state, tribal, territorial, or local police record or court record, or documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional from whom the victim has sought assistance in addressing domestic violence, or the effects of the abuse. If delivery of the certification form places the victim at risk, the owner/agent will work with the tenant in making acceptable delivery arrangements. The resident will have fourteen (14) calendar days, or an agreed upon extension date, to submit the form or provide another form of documentation.

Owner/Agent is not required to demand that an individual produce official documentation or physical proof of status as a victim in order to receive the protections of VAWA. Owners, at their discretion, may provide assistance to an individual based solely upon the individual's statement or other corroborating evidence.

An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be construed as serious or repeated violations of the lease by the victim or threatened victim of that violence and will not be "good cause" for termination of the assistance, tenancy, or occupancy rights of a victim of such violence.

The identity of the victim and all information provided to the owner/agent will be retained in confidence. The owner/agent will retain all documentation relating to an individual's VAWA protections in a separate file that is kept in a separate secure location from the other tenant files. Information will not be entered into any shared database nor provided to a related entity, except to the extent that the disclosure is:

- Requested or consented to by the victim in writing;
- Required for use in an eviction proceeding or termination of assistance; or
- Otherwise required by applicable law.

Owner/Agent must have tenants sign the VAWA lease addendum, form HUD-91067.

Owner/Agent will not penalize victims of domestic violence, stalking, or dating violence if the incident under review is a direct result of such abuse.

Additionally, the CHRA may divide (bifurcate) the lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

RECORDS RETENTION POLICY

Documents related to application and waiting list management will be retained for seven (7) years. 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.

ASSETS

CHRA shall fully verify all net family assets and asset income for all applicant and tenant families at admission and at each annual and interim reexamination. CHRA will not accept a family's self-certification of net family

assets equal to or less than \$50,000 (adjusted annually for inflation).

At annual and interim reexaminations, CHRA shall not apply, review, or enforce the following asset limitations:

- The prohibition on continued assistance for families owning real property suitable for occupancy, and
- The prohibition on continued assistance for families with net family assets exceeding \$100,000 (adjusted annually for inflation).

No tenant family will have assistance terminated, reduced, or delayed at reexamination due to ownership of real property or the total value of net family assets that exceed \$100,000 (adjusted annually for inflation).

INCOME DETERMINATIONS

CHRA shall ensure that tenant rent, and housing assistance payments are calculated accurately and in compliance with HUD requirements. When a tenant family is overcharged rent due to a de minimis error in determining income by the Owner/Agent, the tenant family shall be issued a credit retroactive to the effective date of the action in which the error occurred. Tenant families will not be held responsible for rent overcharges that result from Owner/Agent errors in income determination or rent calculation.

CHRA will utilize Safe Harbor income determinations from eligible means-tested federal public assistance programs as an alternative method for verifying income, prior to the application of deductions. CHRA may accept Safe Harbor income determinations at admission and at annual or interim reexaminations, provided the determination:

- Is dated within the previous 12 months
- Includes the entire household (Family composition must match the assisted unit)
- States the family's annual income amount and family size
- Is obtained through third-party verification

Eligible programs include, but are not limited to:

- Temporary Assistance for Needy Families (TANF)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Earned Income Tax Credit (EITC)
- Low-Income Housing Tax Credit (LIHTC)
- Women, Infants, and Children (WIC)
- Other HUD-approved or federally recognized means-tested programs

Safe Harbor determinations must not be combined with other income verification methods or with other Safe Harbor determinations. If multiple Safe Harbor determinations are provided, CHRA will use the most recent and complete verification that meets HUD requirements. If Safe Harbor determinations does not meet requirements, CHRA will proceed with standard HUD verification methods.

HARDSHIP EXEMPTIONS

CHRA shall provide a general hardship exemption to a family when it demonstrates that eligible health and medical care expenses, or reasonable attendant care and auxiliary apparatus expenses, exceed five percent (5%) of the family's annual income. CHRA defines a qualifying change in circumstances for this general hardship exemption as an increase in qualifying expenses that would not otherwise require an interim reexamination, including but not limited to:

- New or increased out-of-pocket medical expenses
- New or increased costs for disability-related services, equipment, or attendant care
- Changes in medical treatment, insurance coverage, or prescribed auxiliary devices

When a general hardship is approved, CHRA shall grant hardship relief for a single 90-day period. Extensions beyond the initial 90-day hardship period are not permitted. At the conclusion of the 90-day period, the family's rent and deductions shall be recalculated in accordance with HUD requirements unless a separate, qualifying basis for relief applies. CHRA shall obtain third-party verification of the hardship circumstances,

including documentation of the qualifying expenses. If third party verification is not obtainable, CHRA shall document in the tenant file the reason it was not obtainable, and the alternate form of verification used. CHRA shall make reasonable efforts to obtain third-party verification prior to the end of the 90-day hardship period.

CHRA shall provide phased-in hardship relief for families who were receiving deductions for unreimbursed health and medical care expenses and/or reasonable attendance care of auxiliary apparatus expenses based on their most recent income determination prior to January 1, 2024. Eligible families will begin receiving phased-in relief at the first annual or interim reexamination conducted on or after CHRA's updated Tenant Selection Criteria is approved. Eligible expenses will be deducted as follows:

- First 12 months: Expenses exceeding 5% of annual income.
- Second 12 months: Expenses exceeding 7.5% of annual income.
- After 24 months: Expenses exceeding 10% of annual income, unless the family qualifies for general hardship relief.

Tenant families that qualify for and elect to receive general hardship relief will no longer be eligible to receive phased-in relief. CHRA will not continue phased-in hardship relief for families admitted from other assisted housing, regardless of whether the family was receiving phased-in relief at the prior property.

CHRA shall provide a hardship exemption to allow continued deduction of childcare expenses when a tenant family demonstrates a hardship resulting in an inability to pay rent. Approved hardship relief will be granted for one 90-day period only with no extensions. At the end of the 90-day period, the family's rent will be recalculated in accordance with standard requirements unless another qualifying action applies. CHRA will obtain third-party verification of the family's inability to pay rent. If third party verification cannot be obtained, the tenant file will include documentation explaining why and the alternative verification used. CHRA will attempt to obtain third-party verification before the end of the 90-day hardship period.

INTERIM REEXAMINATIONS

Decreases in Adjusted Income:

CHRA will process an interim reexamination regardless of threshold when a family member permanently moves out of the unit, resulting in a decrease in adjusted income. For all other decreases in adjusted income, CHRA has established a 10% threshold. CHRA will conduct an interim reexamination when the family's annual adjusted income is estimated to decrease by 10% or more. CHRA will decline to process an interim reexamination if the estimated decrease is less than 10%. When calculating percentage decreases in adjusted income, CHRA will round to the nearest whole percentage (e.g., a calculated decrease of 9.5% will round up to 10%).

Increases in Adjusted Income:

CHRA will process an interim reexamination when it becomes aware that a family's annual adjusted income has increased by 10% or more. Earned income increases will not be considered when determining if the 10% threshold is met unless the family has previously received an interim reexamination for a decrease in adjusted income during the current reexamination cycle. If a prior interim reexamination for a decrease has occurred, CHRA will include earned income increases when determining whether the 10% threshold is met. CHRA will not conduct an interim reexamination when a family reports an increase income within three months of the next annual reexamination effective date.

Effective Dates:

CHRA requires tenant families to report changes in household composition and income within ten business days of the occurrence of the change to be considered timely. If a change is reported timely, rent decreases will be made effective in accordance with HUD requirements, no earlier than the later of:

- The first day of the month following the actual decrease in income, or
- The first day of the month following the most recent income examination

If a change is not reported within 10 business days, the rent change will be effective on the first day of the month following the month the change was reported. If a reported change cannot be verified before the effective date, CHRA will process the interim reexamination retroactively once verification is received.

REVOCAION OF CONSENT FORMS:

CHRA requires all applicants and tenant families to execute and maintain valid consent forms (Form HUD 9887, Form HUD 9887-A and applicable forms) for the release of information. Tenant families have the right to revoke consent in writing at any time. However, the revocation of consent will result in denial of admission for applicants and termination of assistance for tenant families. CHRA will not process annual or interim reexaminations without a properly executed consent form. Executed consent forms will remain in effect until the family is denied admission, assistance is terminated, and/or the family submits written revocation of consent. CHRA will notify the local HUD office when a family member revokes consent. Tenant families will be informed in writing of their right to revoke consent, the consequences of revocation, and any result impacting their eligibility.

DEFINITIONS

Elderly Family: a household whose head, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

Near-Elderly Family: a household whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons, who are at least 50 years of age but below the age of 62, living with one or more live-in aides.

Disabled Family: a household whose head, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides.

Person with Disabilities: a person who:

- Has a disability as defined in 42 U.S.C. 423;
 - Inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months; or
 - In the case of an individual who has attained the age of 55 and is blind, inability by reason of such blindness to engage in substantial gainful activity requiring skills or abilities comparable to those of any gainful activity in which he/she has previously engaged with some regularity and over a substantial period of time. For the purposes of this definition, the term blindness, as defined in section 416(i)(1) of this title, means central vision acuity of 20/200 or less in the better eye with use of a correcting lens. An eye which is accompanied by a limitation in the fields of vision such that the widest diameter of the visual field subtends an angle no greater than 20 degrees shall be considered for the purposes of this paragraph as having a central visual acuity of 20/200 or less.
- Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
 - Is expected to be of long-continued and indefinite duration,
 - Substantially impedes his or her ability to live independently, and
 - Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
- Has a developmental disability, as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001(8)), i.e., a person with a severe chronic disability that
 - Is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - Is manifested before the person attains age 22;
 - Is likely to continue indefinitely;
 - Results in substantial functional limitation in three or more of the following areas of major life activity: a. Self-care, b. Receptive and expressive language, c. Learning, d.

Mobility, e. Self-direction, f. Capacity for independent living, and g. Economic self-sufficiency; and

- Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated.

This definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome.

For purposes of qualifying for low-income housing, it does not include a person whose disability is based solely on any drug or alcohol dependence.

Means person with disabilities (individual with handicaps), as defined in 24 CFR 8.3, for purposes of reasonable accommodation and program accessibility for persons with disabilities.

Hardship: a documented inability to pay rent, which may include:

- Loss or reduction of income
- Increase in necessary household expenses
- Loss of employment or reduction in work hours
- Other circumstances affecting the family's financial stability

HOUSING AND REDEVELOPMENT AUTHORITY
IN AND FOR THE CITY OF CROSBY

RESOLUTION NO. 2027-01

EDGEWOOD APARTMENTS TENANT SELECTION PLAN

WHEREAS, federal regulations require the Housing and Redevelopment Authority in and for the City of Crosby to review and update the Tenant Selection Plan for the Edgewood Apartments housing program as needed; and

WHEREAS, the Housing and Redevelopment Authority in and for the City of Crosby has reviewed and updated its previously adopted Tenant Selection Plan; and

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

1. The Edgewood Apartments Tenant Selection Plan 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: _____

Paula Traylor, Board Chair

Dated: _____

Eric Charpentier, Executive Director

300 Third Avenue NE
Crosby, MN 56441-1642

PHONE (218) 546-5088

FAX (218) 546-5041

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To: Crosby HRA Board Members
From: Hannah Gangl, Housing Manager
Date: May 1, 2026
Re: Updated EIV Policy & Procedures – Resolution No. 2027-02

As part of the Management and Occupancy Review this year and updated HOTMA requirements, we are required to update our EIV Policy and Procedures to be in compliance with updated HUD regulations.

Items that needed to be updated or modified included:

- Frequency of Review for EIV reports, including Income Discrepancy Report, New Hires Report, and Zero Income Report.
- Usage of Safe Harbor determinations.

Action Requested: Adopt Resolution No. 2027-02, Approval of the updated EIV Policy and Procedures, as presented.

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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.

Usernames, 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.

Reports Utilized and Frequency of Review

The following EIV reports will be pulled:

1. Multiple Subsidy Report
2. Identity Verification Reports
3. Deceased Tenants Report
4. New Hires Report

Each report will be pulled within the first week of each month. Staff will review each report monthly and address deficiencies and discrepancies, taking necessary action based on the information. Specific notes relevant to action taken will be kept in individual tenant files.

Consistent with HOTMA requirements, staff will continue monthly review of the New Hires Report, which meets and exceeds the requirement for review at least quarterly when earned income increases must be considered following an interim reexamination that decreased adjusted income. While EIV use at interim reexaminations is not required, CHRA may utilize EIV reports at staff discretion. When Safe Harbor income determinations are used, staff are not required to use the EIV Income Report or New Hires Report at annual reexamination. Additionally, if Safe Harbor verification was used at the last annual reexamination, staff are not required to use the EIV Income Discrepancy Report at the subsequent annual reexamination.

HOUSING AND REDEVELOPMENT AUTHORITY
IN AND FOR THE CITY OF CROSBY

RESOLUTION NO. 2027-02

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: _____

Paula Traylor, Board Chair

Dated: _____

Eric Charpentier, Executive Director