

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: St. Joseph Housing Commission PHA Type: <input checked="" type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): April 2010 PHA Code: MI046																										
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: 107 units Number of HCV units: 0 units																										
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only																										
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)																										
	<table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) Included in the Consortia</th> <th rowspan="2">Programs Not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>PHA 1:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA 2:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA 3:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program		PH	HCV	PHA 1:						PHA 2:						PHA 3:					
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PHA 1:																											
PHA 2:																											
PHA 3:																											
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.																										
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years: Refer to attachment – MI046v01 Plan.																										
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. Refer to attachment – MI046v01 Plan.																										
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: Refer to attachment – MI046v01 Plan. (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. Refer to attachment – MI046v01 Plan.																										
7.0	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i> Refer to attachment – MI046v01 Plan.																										
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.																										
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> , form HUD-50075.1, for each current and open CFP grant and CFFP financing. Refer to attachments Annual Statement 2007 Rev. 3 through Annual Statement 2009 Org.																										
8.2	Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i> , form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. Refer to attachments Annual Statement 2010 Org. and Capital Fund Program Five-Year Action Plan 2010.																										
8.3	Capital Fund Financing Program (CFFP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.																										

9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p>
9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</p> <p>Refer to attachment – MI04601 Plan.</p>
10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.</p> <p>Refer to attachment – MI046v01 Plan.</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification."</p> <p>Refer to attachment – MI046v01 Plan.</p>
11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>

FIVE-YEAR PLAN – 2010-2014

**ST. JOSEPH HOUSING COMMISSION
601 PORT STREET
ST. JOSEPH, MICHIGAN 49085**

5.1 - MISSION STATEMENT

It is the mission of the St. Joseph Housing Commission to provide a safe, secure, quality of life surrounding for our elderly and handicapped families in the most efficient and cost effective manner. We also mirror the Department of Housing and Urban Development mission to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

5.2 - GOALS AND OBJECTIVES – 2010-2014

- A. *PHA Goal #1: To continue to manage the public housing program in an efficient and effective manner by maintaining a high-performer PHAS status.* We have continued to maintain the high-performer status almost entirely since QWHRA was implemented in 1998. This rating has been achieved by high performance in the financial, management, physical and resident opinion aspects of the operation of the St. Joseph Housing Commission. We will aim to achieve a high-performer status in the new component of properly maintaining and enforcing capital grant fund operations. We will also continue to strive to achieve these high scores by performing daily operations as effectively and efficiently as possible.
- B. *PHA Goal #2: To continue to provide safe and secure housing and maintain a high-performer status for physical inspections.* We will continue to maintain the high score of the physical component by maintaining the properties of the St. Joseph Housing Commission safely and efficiently. Yearly inspections will be held on all units of the facility to keep the property maintained in a clean and safe manner and to continue to increase resident satisfaction. Common areas are monitored continually for safety and cleanliness. We strictly adhere to HUD guidelines for maintaining properties – from replacing cracked electrical outlet covers to making sure that all mechanical systems are always in good working order. In addition to our own maintenance schedules, we will continue to perform required inspections on all equipment (fire system, boiler system, elevators, etc.). We will use capital fund grants to replace appliances as needed, using Energy Star products where

available, and to keep the stock properly maintained. We will continue to enforce policies of cleanliness and safety and require residents to adhere to these policies.

- C. *PHA Goal #3: To continue to maintain a work order completion time period of 1.4 days or better.* We have managed to complete work orders in a very effective manner – completing most within a day of being reported. We encourage and expect residents to report issues immediately so as to maintain a safe and desirable environment. Emergency work orders (electrical, smoke alarms, etc.) are performed within 24 hours. Out of 679 work orders reported for the last fiscal year, 611 were done within 24 hours and 47 were done within 2-4 days.
- D. *PHA Goal #4: To decrease the vacated unit turnaround time below the current level of 78 days.* In 2007, we had improved the vacated unit turnaround time from 68 to 29 days but it notably increased in the last two years. This is due to the increasing number of apartments being vacated by elderly residents, thus increasing the work load considerably. This increased vacancy rate, along with a waning waiting list, makes it difficult to fill the apartments in a timely manner. The lease-up time is close to the number of days it takes to make the apartment ready for occupancy. Our vacancies are primarily due to the normal attrition of residents from death, entrance to nursing homes, etc. We have a high volume of very elderly residents at this time so turnover is expected to be high. We have 68 elderly residents out of 113 total residents (65%) - with an average age of 78. Younger disabled residents (35%) tend to remain for a long period of time. It should be noted that the high vacancy rate is an issue that has developed throughout the industry.
- E. *PHA Goal #5: To continue to improve customer service and marketability.* This objective can be accomplished by designing a media to keep residents more informed of projects and issues of concern in the facility. In addition to informative memos that are currently delivered to each resident, the staff will prepare a monthly newsletter that will include news on projects currently underway at the facility; discussions of safety issues and policies; listing dates and times of Housing Commission meetings, safety meetings or any other informative meetings; helpful hints, etc. We will continue to: 1) promote interaction between staff and residents by encouraging the residents to offer suggestions and to become involved in meetings; 2) use our television message system to keep residents informed of emergencies, etc.; 3) notify residents of maintenance performed in their apartment (if not at home) by leaving explanation cards hung on their door; and 4) maintain the facility in a manner to promote safety, cleanliness and an overall quality of life atmosphere. We have included a landscaping project in this five-year plan to promote a nicer curb-appeal to potential applicants.

F. *PHA Goal #6: To maintain an occupancy rate of 98%. We have consistently maintained an average occupancy rate of 97% - 104 apartments out of 107 rented. We will pursue an advertising initiative to encourage applicants for our waiting list. We will continue to promote our facility using media such as brochures and invitations to visit. We have placed media at such places as local churches, senior centers, visitor centers, etc. Our goals to maintain the property in a clean and safe manner are important in maintaining low vacancy rates. With the construction boom of recent years, we are suddenly faced with competing with many new facilities with updated amenities. We have been committed to using available funds to improve the aesthetics and living conditions of our facility and will continue.*

G. *PHA GOAL #7: To continue to operate the St. Joseph Housing Commission in full compliance with Equal Opportunity and Fair Housing laws and regulations. We will continue to promote our policy of providing housing to individuals regardless of race, color, religion, national origin, sex, familial status, and disability. We will continue to educate employees of the St. Joseph Housing Commission on Equal Opportunity and Fair Housing laws and regulations and expect them to adhere to these guidelines. We have had no Fair Housing law suits.*

6.0 (A) - PLAN ELEMENTS REVISED SINCE LAST SUBMISSION

A. Eligibility, Selection and Admission Policies, including Deconcentration and Wait List Procedures.

No change to policies since 2007 plan submission.

B. Financial Resources and Policies.

There have been no changes in the financial policies but the following is an updated financial resource table.

Financial Resources:		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2009 grants)		
a) Public Housing Operating Fund	146,960	
b) Public Housing Capital Fund	119,825	PH Capital Improvement
c) HOPE VI Revitalization	0	

Financial Resources:		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	0	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	0	
g) Resident Opportunity and Self-Sufficiency Grants	0	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below):		
2009 ARRA Funds	152,163	PH Capital Improvement
2. Prior Year Federal Grants (unobligated funds only) (list below)		
2007 and 2008 CFP	116,078	PH Capital Improvement
3. Public Housing Dwelling Rental Income	335,000	PH Operations
4. Other income (list below)		
Interest	9,000	PH Operations
Other Operating	38,730	PH Operations
4. Non-federal sources (list below)	0	
Total resources	917,756	

C. Rent Determination Policies.

No change in rent determination policies.

D. Operation and Management Policies.

The Internal Control Policy was adopted by the St. Joseph Housing Commission on July 10, 2008. A copy of the policy is submitted with this document as Attachment A – Internal Control Policy.

E. Grievance Procedure Policies.

No change in grievance policies.

F. Designated Housing for Elderly and Disabled Families Policies.

No change in designated housing policies.

G. Community Service and Self-Sufficiency Policies.

The Community Service and Self-Sufficiency Policy was revised by the St. Joseph Housing Commission on May 15, 2008. A copy of this policy is submitted with this document as Attachment B – Community Service and Self-Sufficiency Policy.

H. Safety and Crime Prevention Policies.

No change in safety and crime prevention policies.

I. Pet Policies.

No change since previous submission with the 2008 Annual Plan.

J. Civil Rights Certifications and Policies.

No change in Civil Rights policies.

K. Fiscal Year Audit.

No change to auditing policies. Current audit for FYE 3/31/09 has been performed. Audits are on file for review.

L. Asset Management Policies.

No change in asset management policies.

M. Violence Against Women Act (VAWA) Policies.

No change since previous submission with the 2008 Annual Plan.

6.0 (B) - LOCATION OF COPIES OF FIVE-YEAR AND ANNUAL PLANS

Copies of the St. Joseph Housing Commission's Annual and Five-Year Plans can be reviewed by the public at the following locations:

- ❖ St. Joseph Housing Commission
601 Port Street
St. Joseph, MI 49085
- ❖ City of St. Joseph – City Clerk's Office
700 Broad Street
St. Joseph, MI 49085
- ❖ Maud Preston Palenske Memorial Library
500 Market Street
St. Joseph, MI 49085

PHA PLAN ELEMENTS

In addition to the items discussed in this five-year plan, the following components are readily available to the public for inspection at the Management Office of the St. Joseph Housing Commission:

- A. Eligibility, Selection and Admission Policies, including Deconcentration and Wait List Procedures.
- B. Financial Resources and Policies.
- C. Rent Determination Policies.
- D. Operation and Management Policies.
- E. Grievance Procedure Policies.
- F. Designated Housing for Elderly and Disabled Families Policies.
- G. Community Service and Self-Sufficiency Policies.
- H. Safety and Crime Prevention Policies.
- I. Pet Policies.
- J. Civil Rights Certifications and Policies.
- K. Fiscal Year Audit.
- L. Asset Management Policies.
- M. Violence Against Women Act (VAWA) Policies.

**7.0 - HOPE VI, MIXED FINANCE MODERNIZATION OR DEVELOPMENT,
DEMOLITION AND/OR DISPOSITION, COVERSION OF PUBLIC HOUSING,
HOMEOWNERSHIP PROGRAMS, AND PROJECT-BASED VOUCHERS**

- A. Hope VI or Mixed Finance Modernization or Development – the St. Joseph Housing Commission has no current programs under administration nor plans on applying for any during the upcoming Five-Year period.
- B. Demolition and/or Disposition – the St. Joseph Housing Commission has no plans for demolition or disposition of public housing projects or units.
- C. Conversion of Public Housing – the St. Joseph Housing Commission has no plans to voluntarily convert any of its public housing projects or units to tenant-based assistance.
- D. Homeownership – the St. Joseph Housing Commission has no plans to enter into administering a homeownership program.
- E. Project-Based Vouchers – the St. Joseph does not administer a tenant-based voucher program. This element is not applicable to the St. Joseph Housing Commission.

8.0 – CAPITAL IMPROVEMENTS

8.1 – Capital Fund Program Annual Statement/Performance and Evaluation Report

Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Reports for CFP 2007, CFP 2008, ARRA 2009 and CFP 2009 are submitted electronically with this document.

8.2 – CAPITAL FUND PROGRAM FIVE-YEAR ACTION PLAN

Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report for 2010 is submitted electronically as an attachment to this document.

Form HUD-50075.2, Capital Fund Program Five-Year Action Plan for 2010-2014 is submitted electronically as an attachment to this document.

9.1 – STRATEGY FOR ADDRESSING HOUSING NEEDS

Housing Needs of Families on the PHA's Waiting Lists			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance <input checked="" type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	17		19
Extremely low income <=30% AMI	9	52.9%	
Very low income (>30% but <=50% AMI)	5	29.4%	
Low income (>50% but <80% AMI)	3	17.7%	
Families with children	0	0	
Elderly families	7	41.2%	
Families with Disabilities	10	58.8%	
Race/ethnicity – White	16	94.1%	
Race/ethnicity – African/American	1	5.9%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR-Small	4	23.5%	
1 BR-large	12	70.6%	

Housing Needs of Families on the PHA's Waiting Lists			
2 BR	1	5.9%	
3 BR	N/A		
4 BR	N/A		
5 BR	N/A		
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

We operate one low-income facility that is designated elderly and disabled. Our waiting list remains fairly low, with the small one-bedroom apartment being the hardest to fill. Most waiting list applicants are interested in the larger one-bedroom, so small apartments tend to sit longer. We have to compete with several new facilities built in the area. These new facilities offer newer amenities than we can currently provide, e.g. dishwashers, carpet, garbage disposals, etc.

As evidenced by the above table, we currently have four applicants on the waiting list for the small, one-bedroom apartments. Of the twenty-two vacancies in the past year, thirteen were for small apartments. Quite often, those apartments have remained unoccupied until we have someone available to fill them. The oldest application on file is from June 30, 2007. This person required handicapped facilities but found housing elsewhere and wanted to remain on the list in case her situation changed. We have offered apartments to two other individuals on this list but they are unable to move at this time due to health or financial situations.

There are twelve individuals waiting for large, one-bedroom apartments - the oldest application date being April 17, 2007. We had only seven vacancies in this category in the last year. We often lose applicants in this area simply because the wait is long and they have moved elsewhere.

We have one applicant for a two-bedroom apartment – of which we only have four. This applicant has been on the waiting list since January 27, 2006. We have only had two of these apartments become available in the past four years and those were filled by internal moves due to change in family composition.

Reasonable accommodations and internal moves for emergencies, change in family composition, etc. also take precedence over the outside waiting list. Of the twenty-two vacancies in the past year, two were filled internally by reasonable accommodation due to medical reasons.

10 (A) - STATEMENT OF PROGRESS IN MEETING GOALS AND OBJECTIVES
2005-2009 FIVE-YEAR PLAN

- A. *PHA Goal #1: Increase the supply of assisted housing by increasing our 96% occupancy rate.* We were able to increase our most recent occupancy rate to 97.2% during a time of increased vacancies.
- B. *PHA Goal #2: Improve the quality of assisted housing by improving public housing management (PHAS Score), increase customer satisfaction by increasing meetings between residents and management and renovate or modernize public housing units.* We have succeeded in maintaining a high-performer status under the PHAS system for the past five years. We continue to receive good-standing financial audits. We have made a concerted effort to inform residents of policies and procedures in place to make the facility a desirable place to live. We hold safety meetings and encourage residents to attend Housing Commission meetings. A yearly meeting is held with City officials. They inform residents of items of interest regarding the City of St. Joseph. It is also a chance for residents to offer suggestions to those officials, i.e. snowy sidewalk issues, sidewalk issues for those using wheelchairs, etc. We often place items of interest or concern in the monthly Lake View Terrace Association newsletter, which is prepared by the resident organization. Resident memos are delivered to each apartment and also posted in the elevators and in the enclosed bulletin board near the office. We provide a resident handbook to each new resident that informs them of policies and procedures in a user friendly manner. Amendments to the handbook are provided to all residents as revised. Due to the immediate need to improve major operating systems (boiler system, hot water system, etc.), we have not been able to spend funds to modernize the units as we had planned.
- C. *PHA Goal #3: Provide an improved living environment by implementing measures to deconcentrate poverty by bringing higher income public housing households into lower income developments.* We have one facility and it is not easy to implement these measures. We cannot target individuals to different facilities to deconcentrate. Many of the younger disabled residents are on very low fixed incomes and we are unable to target higher income people in this age group. Marketing the location of the facility and amenities offered by the community increases elderly applications with higher retirement incomes. The percentages for each group of residents are fairly equal – 65% of the residents are elderly and 35% disabled. This compares to a rate of 90% elderly and 10% disabled approximately nine years ago.
- D. *PHA Goal #4: Promote self-sufficiency and asset development of assisted households by providing or attracting supportive services to increase independence for the elderly or families with disabilities.* Sixty-five percent of our residents are

elderly with an average age of 78 years old. Many of the remaining residents have various disabilities that preclude them from working or getting out easily. We provide or attract a variety of services to help residents. Some of those are as follows:

- Many residents qualify for commodities but have no means to pick them up from the local senior center. Initially, a representative from the senior center came to our facility to hold a sign-up meeting. Eventually, St. Joseph Housing Commission staff became certified to enroll the residents into the program. We also pick up the commodities and deliver them to the residents.
- A free monthly health clinic is held for residents where they can have their vital signs monitored. Residents can discuss any issues they have been having with a licensed nurse. This often acts as a heads-up to the resident that they should further consult with their own physician.
- Residents are encouraged to participate in a resident association that organizes various social and informative functions, e.g. monthly entertainment from outside sources; potlucks; exercise classes; arts and crafts; movie nights; bingo, etc.
- A lounge on the 15th floor of the facility provides a comfortable atmosphere to enjoy socializing with neighbors, family and friends away from their apartment. A large library is located in this lounge, with seating for those wishing to read. There are game tables and café tables where residents can sit and view beautiful scenery situated by the St. Joseph River and Lake Michigan. Some organizations use this lounge to provide services to residents, e.g. a local priest performs communion each week to those unable to attend services at their church, etc.
- There is a beauty shop available for residents where the beautician keeps normal hours one day a week and makes appointments for other days. Many residents use this service – especially during winter months when inclement weather makes it difficult to leave the building.
- Immunization clinics are held each fall. Free tax services are provided by qualified individuals through the senior center each year. Safety meetings are held with local police and fire personnel. We invite speakers to educate residents on new issues, e.g. when new supplemental insurance requirements were instituted.
- We often aid residents in contacting other service providers that they may need, e.g. Adult Protective Services, Department of Human Services, care givers, etc.

- E. *PHA Goal #5: Ensure equal opportunity and affirmatively further fair housing by undertaking affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability; undertake affirmative measures to provide suitable living environment for families living in assisted housing; and to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.* The staff of the St. Joseph Housing Commission is committed to encouraging applicants regardless of race, color, religion, national origin, sex, familial status, and disability. We work closely with organizations to place individuals with all varieties of disabilities. This is reflected in the increase of the number of disabled individuals residing in our facility. We have made improvements to the facility to aid individuals with various disabilities, e.g. ADA water fountain, front-loading laundry facilities, automatic facility entrance door systems, automatic door opener systems in some common areas, etc.
- F. *PHA Goal #6: Decrease unit turnover time and continue to maintain the building in a physical manner to earn high inspection scores.* We were not successful in decreasing our turnover time in the past two years. We had gone from an average of 69 days per unit in 2005 to 29 days per unit in 2007 but dropped considerably this past year. As explained in a previous section, we have had very high turnover rates in the past couple of years and they have usually fallen in groups. We may have a period with 0-1 vacant units - then we will have numerous vacancies in one month – sometimes as many as eight units.

In the past five years, we have had three physical inspections – the scores being 95% in 2005, 89% in 2007 and 95% in 2009. Because of being a small PHA with less than 250 units and keeping our rating above a standard performer, we are only required to be inspected by HUD every two years. We work diligently to keep the facility in good shape at all times.

- G. *PHA Goal #7: Maintain project and units in an efficient and cost effective manner.* We have been successful in operating in a manner to consistently add to our operating reserves each year. This has afforded us the opportunity to use reserves to make important capital improvements to the facility, i.e. new boiler system, etc. This is in addition to using capital fund program grants. We have had operating reserves to readily use for major unexpected repairs and to also run the organization in an efficient manner in areas such as increasing maintenance and labor costs. This has been accomplished at a time when we have received lower operating subsidy from HUD than set by its own guidelines. We have also transferred an authorized percentage of capital fund program grants to operating reserves yearly.
- H. *PHA Goal #8: Provide a safe and pleasant residence.* All common areas have been remodeled in recent years – to include painting, carpeting, new ceilings, entry

systems and new furnishings. Several facility improvements have been made – new boiler system; new domestic hot water system; new generator; brick and mortar project; increased and improved parking lots; television system; outside painting, to include balconies; water system improvements; new fire system and several more smaller projects. Apartment appliances have been purchased each year to maintain a properly operating and maintained stock.

10 (B) – SIGNIFICANT AMENDMENT AND SUBSTANTIAL DEVIATION/MODIFICATION

The St. Joseph Housing Commission may periodically amend their plan as a result of changing needs and goals of the agency. It will meet with the Resident Advisory Board, request public comment and hold a public hearing if it should need a substantial deviation and/or significant amendment or modification to the plan.

Substantial Deviation/Modification is defined as:

1. A significant change of more than 25% in any financial fund, either Operating, Capital or Reserve, that materially affects the ability of the St. Joseph Housing Commission to implement the provisions of the Annual Plan or the Five-Year Plan, either allowing items to be completed ahead of schedule or causing the delay in the implementation of those planned items; or
2. Actions of the St. Joseph Housing Commission that are in response to and in an effort to mitigate the results of emergencies or natural disasters causing wide-spread damage to its properties and facilities.

Significant Amendment is defined as:

1. Changes to rent or admission policies or organization of the waiting list;
2. Additions of non-emergency work items (items not included in the current Annual Statement or Five-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund;
3. Additions of new activities not included in current or future PHDEP Plans, should they be approved;
4. Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities;
5. And other action requiring formal action by the Board of the St. Joseph Housing Commission.

If there are any changes in the above items reflected by changes in HUD regulatory requirements, such changes will not be considered significant amendments.

11 – REQUIRED SUBMISSION FOR HUD FIELD OFFICE REVIEW

The following signed forms have been provided by mail or electronically to the Detroit Field Office:

- A. Form HUD-50077, *PHA Certification of Compliance with the PHA Plan and Related Regulations*.
- B. Form HUD-50070, *Certification for a Drug-Free Workplace (submitted electronically)*.
- C. Form HUD-50071, *Certification of Payments to Influence Federal Transactions (submitted electronically)*.
- D. Form SF-LLL, *Disclosure of Lobbying Activities (submitted electronically)*.
- E. Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (N/A)*.
- F. Resident Advisory Board (RAB) comments (submitted electronically).
- G. Challenged Elements – Not Applicable.
- H. Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (submitted electronically)*.
- I. Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (submitted electronically)*.

ATTACHMENT A

INTERNAL CONTROL POLICY

The St. Joseph Housing Commission understands the importance of protecting, safeguarding and managing its resources. The goals of the internal control policy are to ensure that the Commission:

- Adheres to laws, regulations and management directives;
- Promotes orderly, economical, efficient, and effective operations and achieves its planned outcomes;
- Safeguards resources against fraud, waste, abuse and mismanagement;
- Provides quality services consistent with the St. Joseph Housing Commission's Mission Statement and;
- Develops and maintains reliable financial and management information and fairly discloses that data through timely reporting to the Board of Commissioners and other interested entities.

The internal controls set forth by this policy are intended to:

- Provide an overall framework to establish and maintain effective internal controls,
- Describe the internal control roles and responsibilities of the St. Joseph Housing Commission staff, and
- Describe the internal control practices for the financial functions.

One of the most effective ways to safeguard the Housing Commission's resources is segregation of duties. Since the Housing Commission is a small entity, complete segregation of duties is not possible. Where a conflict may exist, the Housing Commission incorporates compensating controls to minimize any potential risk.

The policy addresses internal controls for the following areas:

- Revenues
- Expenditures
- Property & Equipment Assets
- Investments
- Payroll
- Financial Reporting
- Security
- Implementation

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I. REVENUES

A. Cash Handling

This practice presents the guidelines for staff of the St. Joseph Housing Commission who handle cash. “Cash handling” includes all monies received by any employee on behalf of the Housing Commission, regardless of form, i.e. cash, checks, money orders, etc. The St. Joseph Housing Commission does not accept credit cards for payment. All employees who have the responsibility for handling cash should review these procedures periodically to ensure compliance. All employees handling cash will be bonded.

All funds received are deposited into the appropriate accounts on a timely basis. The Office Manager will open and date-stamp all mail. Checks will be endorsed “for deposit only” at the time of receipt and the deposit shall be prepared. The Office Manager shall make electronic deposits whenever possible. The Director will review the deposits and acknowledge them in writing by initialing them or by electronic signature. When an electronic deposit cannot be completed, the Director shall take the deposit to the bank. All funds not deposited will be locked and secured each night. The Office Manager will be responsible for securing the funds.

Cash handling pertains to the following: Receipting rent, deposits (key/pet/security), postage stamp/telephone/copy/fax fees, petty cash, receipt of repayments to the St. Joseph Housing Commission, sale of St. Joseph Housing Commission goods and any other practices involving funds which are handled by St. Joseph Housing Commission employees.

The following shall apply to all cash funds.

1. Checks shall be made payable to the St. Joseph Housing Commission and be accepted only for the amount of the transaction (rent/sale/repayment/deposits). Security/pet/key deposits are restricted funds that are accounted for and deposited into a separate bank account. Checks may not be written for more than the amount of the transaction. The St. Joseph Housing Commission does not cash checks. If a rent check is written for more than the amount owed for rent, the balance will be applied as a credit on the resident’s account.
2. Any check returned from a bank to the St. Joseph Housing Commission for any reason shall be assessed a \$25.00 fee plus any fees charged to the Commission by the bank. Any waiver or dismissal of the fee must be reviewed and approved by the Director. The St. Joseph Housing Commission shall not accept a check from any party who previously had a check returned to the Commission for insufficient funds.
3. Post-dated or two party checks are not accepted.
4. Deposits are made on a timely basis. Electronic deposits will be made for checks and money orders. During the beginning of the month when rents are being collected, the deposits shall be made more frequently. No payment will be held for more than 30 days.

5. All funds on hand shall be securely locked up at the close of the business day. Metal boxes containing money used for change will be kept out of view of the public.

Receipting Rent

The preferential methods of payment for rent are check, money order or direct deposit (when available). Cash payment is not accepted. Rent can be paid in person, by U.S. Mail, electronic deposit (when available) or deposited into the Rent Receptacle box by the Housing Commission office door. The Office Manager is responsible for receiving rent payments. When the St. Joseph Housing Commission receives a rent payment, the Office Manager posts the payment into the tenant ledger on the automated tenant accounting system. Two numbered receipts are printed. One is given or mailed to the person paying the rent and the other is used to prepare and balance the deposit. The Office Manager is responsible for the preparation of the deposit. The Director shall review the deposit and acknowledge the preparation in writing.

Public Housing Petty Cash

Two hundred and fifty dollars is kept in a petty cash fund for small, miscellaneous expenses and purchases for the Public Housing program. The person requesting reimbursement must present an original receipt for the goods or services to be reimbursed and complete the request slip. Examples of such items include but are not limited to postage for overnight or special delivery and maintenance items to a vendor for which we have no account. The St. Joseph Housing Commission keeps the original receipt and the Office Manager disburses the cash to the appropriate person after reviewing the request with the Director. On a periodic basis the Office Manager removes the receipts and balances the petty cash fund. When the fund is functionally depleted, the Office Manager will request that the Director issue a check to cash and replenish the fund to the \$250.00 level.

Returned Checks and Repayments

The Office Manager will review all returned checks. If the check was originally issued by the Housing Commission and returned, the Office Manager will void the check and have the Director review the void. The funds will then be added back to the appropriate account. If the repaying party issued a check from his/her account, the Office Manager will record the funds into the proper account and include it with the next deposit.

Sale of Property and Miscellaneous Proceeds

All money received for the sale of property and other miscellaneous proceeds, including repayments, shall be receipted at the time the St. Joseph Housing Commission receives the money. A copy of the receipt is provided to the customer. The Office Manager shall record the funds into the proper account. The funds shall be included with the next deposit.

If the St. Joseph Housing Commission uses an auction company to dispose of its assets, the money will be receipted and recorded at the time it is received.

B. Rent Collection

The original lease for all units is for twelve months. The terms of the lease provide that the rent is to be paid in full on the first day of the month. After the first year, the lease is on a month-to-month basis and automatically renews with the payment of the monthly rent. Rent is to be paid by the resident without requiring a statement from the St. Joseph Housing Commission. The St. Joseph Housing Commission will use the following guidelines for rent collection:

1. The rent is due on the first of each month.
2. At the close of business on the fifth working day of each month, the Office Manager will assess a late charge of \$5.00 or a dollar a day (whichever is greater) to each account that has an outstanding balance for rent. The late fee is due by the first of the following month. All dismissals of late fees must be reviewed and approved by the Director.
3. If the rent is not paid in full by the close of business on the fifth working day of the month, the Office Manager will issue the resident a fourteen-day Notice to Quit.
4. Failure of the resident to comply with the Notice to Quit within the fourteen days, will initiate eviction proceedings.
5. If a resident has four unapproved late payments or more in a twelve-month period, the resident may be subject to eviction, regardless if the payments are current.
6. Any court costs associated with the non-payment of rent shall be assessed to the resident.
7. If a resident requests special arrangements to keep the rent current, he/she must consult with the St. Joseph Housing Commission **prior** to the date the rent is due. A decision to accept partial payments or grant an extension will be made by the Director of the St. Joseph Housing Commission. This decision shall be final and shall be based on the resident's past record of payment, as well as other considerations. All requests for an agreement to pay the past due balance **must be in writing**, specifying the reason for the request and specifying the date the full amount will be paid. Verbal requests will not be considered.
8. The St. Joseph Housing Commission will accept rent payments by check, money order or ACH transfers (when available). The Commission will not accept cash.
9. The Office Manager will collect the rent, provide or mail a receipt to the resident at the time the rent payment is received, balance the daily intake and prepare the deposit.
10. The Director shall review each deposit against the rent roll to ensure the amounts collected are the amounts owed for those tenant files maintained by the Office Manager.

C. Debt Write-Off Policy

The St. Joseph Housing Commission will write-off any resident debt if:

1. The debtor's whereabouts are unknown and the debt is more than six months old; or
2. The debtor's whereabouts are unknown and the debt is less than \$2,000.00; or
3. The debtor is deceased.

If one of the above conditions is met, the St. Joseph Housing Commission will write off the debt in accordance with the Generally Accepted Accounting Principles (GAAP). The St. Joseph Housing Commission will continue to pursue all remedies available to collect on the debt.

The Director shall prepare a listing of the debts to be written off for approval by the Board of Commissioners before the end of the Commission's fiscal year.

II. EXPENDITURES

A. Accounts Payable and Purchases

All purchases made by the St. Joseph Housing Commission must be authorized on a Purchase Order (PO). The person purchasing equipment or supplies must complete a PO and record the PO# into the logbook. The Office Manager will be responsible for providing PO # for telephone requests and for recording it into the logbook. All Purchase Orders must be submitted to the Director or Designee for approval. If the receipt for the purchase is available, it must be attached to the PO at the time it is submitted to the Director. The Director/Designee's signature on the PO authorizes the purchase.

The Director/Designee will give the PO to the Office Manager after it is signed. The Office Manager will maintain the PO's to match up with invoices.

Any packing slip or receipt will be initialed for its accuracy by the employee receiving the order. This will act as notification for the Director that the order was complete and that the payment can be processed.

All mail received by the St. Joseph Housing Commission shall be opened and date stamped by the Office Manager. The Office Manager will match all invoices to the appropriate purchase order. Any discrepancies must be clarified before payment is made. Utilities, contractual obligations, recurring expenses (i.e. water, elevator inspections), etc. do not require a purchase order. The Office Manager will forward all invoices to the Director/Designee for payment.

B. Check Writing

The St. Joseph Housing Commission hereby establishes a policy that identifies those persons who are authorized to sign and issue checks on its behalf. It is also necessary to implement appropriate internal controls over financial matters. The St. Joseph Housing Commission will adhere to the following guidelines when issuing and signing checks:

1. The Director shall have the primary responsibility for issuing checks. The Director does not have the authorization to sign the checks.
2. Checks are to be prepared from a vendor invoice only and not from a vendor statement. All checks shall be made payable to a specified vendor and never to cash or bearer. The signing of blank checks is strictly prohibited.
3. The St. Joseph Housing Commission shall authorize all check signers. All checks shall bear two signatures, both of which must be authorized Commissioners of the St. Joseph Housing Commission. The signatures may be written or signature stamped. The Director is responsible for the safekeeping of the signature stamps. The stamps must be requested for use and immediately returned to the Director when the task for which they were requested has been completed.
4. The persons serving in the positions authorized to sign checks shall be bonded through the St. Joseph Housing Commission's blanket fidelity bond.
5. The supporting data for each check shall be available for the signer to review at any time. All supporting documentation must be properly cancelled at the time of entry into the computer system to prevent duplicate payment. Proper cancellation requires the following information to appear on the invoice: date paid, check number, authorized approval signature or initials, amount paid and general ledger account code.
6. The St. Joseph Housing Commission shall not permit any automated signatures.
7. Spoiled checks shall be mutilated and retained. All check numbers shall be accounted for.
8. Any voided checks must be approved by the Director in writing or by electronic signature.
9. The Board of Commissioners shall review and approve all check payments made by the St. Joseph Housing Commission.
10. The Director shall ensure that all unused checks be maintained in a locked and secure area to prevent unauthorized access and use.

C. Bank Reconciliations

1. All bank accounts must be reconciled to the general ledger accounts monthly.
2. The Director will perform the bank reconciliations for the Housing Commission and then forward a copy of the bank statements, checks issued for the month, deposits collected, and any other necessary transactions, to the fee accountant, who will in turn reconcile the

account once again, making sure to note any discrepancies and provide them to the Housing Commission.

3. In reconciling the bank accounts, the Director will be diligent in comparing the cancelled checks for proper authorized signatures and endorsements.

D. Outstanding Checks

In order to maintain accurate fund balances, the St. Joseph Housing Commission shall follow the guidelines below when dealing with outstanding checks:

1. All accounts shall be reconciled monthly by the fee accountant. The Director shall review all accounts and acknowledge so in writing.
2. Checks shall be considered void after 365 Days.
3. The Director shall add all voided checks back to the appropriate account annually before the end of the fiscal year.
4. Electronic payments to vendors and landlords shall be made whenever possible; therefore, no check shall be issued.
5. In the event the payee requests the funds from a voided check, the Director shall issue a new check.
6. If a payee cashes a check that has been written off, the Director shall contact the bank and have the transaction voided. The bank will reclaim the funds from the cashed check and reimburse the Housing Commission's account.

This practice shall be reviewed and revised as necessary.

E. Bank Credit Card

The St. Joseph Housing Commission shall have at its disposal the use of a bank credit card. The Director is responsible for the prudent use of the credit card. When the credit card is used, the following shall apply:

1. The credit card shall be used only when no other payment option is available or practical.
2. Only the Director or his/her Designee shall be authorized to use the credit card. The Director is responsible for the protection and custody of the card.
3. The credit card shall be used only for the purchase of goods and services for official business of the St. Joseph Housing Commission.

4. All purchases with the credit card must have a corresponding purchase order, unless final payment will not be made with the credit card, (e.g. the card is used to make a hotel reservation but not used for payment). The purchase order must detail what was purchased, the cost, the date and a brief description as to why it was necessary to use the credit card.
5. All receipts from credit card purchases must be attached to the purchase order. If a purchase is authorized over the telephone with the credit card, then the packing slip or other statement will be used in the same manner as a receipt.
6. The maximum limit for the credit card is \$5,000.00.
7. All payments to the credit card company shall be for the full amount of the bill so that the St. Joseph Housing Commission does not incur any interest expense.
8. Upon leaving employment, the Director and/or his/her Designee, shall return the credit card to the Commission.
9. All other Housing Commission policies (i.e. travel, procurement, etc.) shall apply to credit card purchases.

III. PROPERTY & EQUIPMENT ASSETS

All acquisition of property and assets shall comply with the St. Joseph Housing Commission's Procurement Policy.

A. Capitalization

The purpose of capitalization is to set forth the criteria in determining, distinguishing, and recording expendable and non-expendable equipment purchased or acquired in connection with the development, management and maintenance of the properties owned and managed by the St. Joseph Housing Commission.

1. If the initial cost of a piece of equipment and /or other personal property is \$500.00 or more and the anticipated life or useful value of said equipment or property is more than one year, the same shall be capitalized and recorded as non-expendable equipment and charged as a capital expenditure.
2. If the initial cost of the piece of equipment and/or personal property is less than \$500.00 or its useful life is less than one year regardless of cost, the same shall be treated and recorded as materials or inventory (expendable) and charged to maintenance, administration, or tenant service expense.
3. The Director, or the Director's Designee, is authorized and directed to determine whether each piece of equipment or other personal property that is acquired by the St. Joseph Housing Commission in connection with the development, management and maintenance

of the properties owned or operated by the Housing Commission, shall be classified as expendable or non-expendable, as described in the preceding sections. The Director is further charged to ensure that the determination is documented in the appropriate records of the Housing Commission and retained for the information and guidance of its personnel and for audit purposes.

B. Fixed Assets

1. Fixtures, Furniture and Equipment:

The tracking of fixtures, furniture and equipment owned by the St. Joseph Housing Commission is essential for its financial well-being. The assets shall be classified into Office/Administrative assets and Maintenance assets. All assets that are portable shall have an asset number assigned. A physical accounting of all equipment and fixed assets in both the offices and the maintenance department is required annually. The Director or the Director's Designee shall maintain a ledger of all property to be tracked. The Director shall distribute the fixed asset ledgers at the time the accounting is to be completed. A person other than the person who has custody of the assets must complete the reconciliation of the assets to the ledger. As an example, two staff may agree to inventory each other's office. The Director or the Director's Designee will do spot checks on the procedure after completion.

The following items shall be labeled:

Office and Administrative

- a. All computer equipment
- b. All office furniture
- c. All filing cabinets, tables, chairs, bookcases
- d. Cameras and other electronic equipment

Maintenance

- a. All portable equipment (excludes small non-power tools such as hammers, tape measures, etc.)
- b. Stoves and Refrigerators (when placing a new one into a unit).
- c. Utility vehicles, such as trailers, plow blades, etc.
- d. Motorized vehicles such as the Kubota, Power Mowers, etc. The trucks shall not be labeled.

2. Fixed Asset Detail Register:

The Fixed Asset Detail register shall contain only those items that are depreciated. It shall not include any expendable items. The fee accountant shall prepare and maintain the Fixed Asset Detail Register with input from the St. Joseph Housing Commission staff. The Director or Designee must annually reconcile the property to the Fixed Asset Detail Register.

2. General

Whenever the St. Joseph Housing Commission acquires new equipment, it shall be entered on the appropriate ledger/register and be assigned an asset inventory number, if appropriate, by the Director or Designee.

When property is disposed, the Director or Designee shall remove it from the ledger and provide a comment as to its disposition. All property removal must follow the procedure in the Disposition of Assets section. The Director or Designee must record the disposition on the asset ledger/register. The Director or Designee is responsible to report the change to the fee accountant.

C. Disposition of Assets

The St. Joseph Housing Commission will adhere to the following when disposing of its assets.

The St. Joseph Housing Commission disposes of property of varying values. The estimated value of the property will determine the manner of disposition. The estimated value will be determined by the Director or the Director with the assistance of the St. Joseph Housing Commission Board.

For property of no significant value – includes such items as refrigerators and stoves in non-working order, where the cost of repair exceeds the value and other items that have no intrinsic value. St. Joseph Housing Commission staff may purchase these items for a nominal fee of \$1.00. When an employee purchases an item, he/she must complete the “Permission to Purchase St. Joseph Housing Commission Owned Property” (Attachment A). The Director will authorize such purchases. If a person outside of the St. Joseph Housing Commission staff would like to purchase the property, he/she may do so for \$1.00. If the property cannot be sold, it will be discarded.

For property with value greater than \$1.00 but less than \$100.00 – includes such items as old light fixtures and poorly working appliances. St. Joseph Housing Commission staff may purchase these items for a nominal fee as negotiated between the employee and the Director. When an employee purchases an item, he/she must complete the “Permission to Purchase St. Joseph Housing Commission Owned Property”. The Director will authorize such purchases. If a person outside of the St. Joseph Housing Commission staff would like to purchase the property, he/she may do so for a negotiated price with the Director or the Director’s Designee. If the property cannot be sold, it will be discarded.

For property with value greater than \$100.00 but less than \$300.00 – includes such items as used office equipment, computers, etc. St. Joseph Housing Commission employees may purchase such items with the consent of the Director and one Board member, who together will determine a reasonable value. The employee must complete the “Permission to Purchase St. Joseph Housing Commission Owned Property” which must be signed and approved by the Director and one Board member. If no employee wishes to purchase the property, it will

be sold to any interested party for a reasonable amount as determined above. If the property cannot be sold, it will be discarded.

For property with value greater than \$300.00 but less than \$1,000.00 – includes such items as vehicles and machinery. The St. Joseph Housing Commission will publish a notice in the local paper and solicit sealed bids for the item(s). Employees may bid on the items as well as the general public. The notice will include the timeframe for which the bids will be accepted. The Director and one other non-interested party, either staff or a board member, will open the bids. The item will be sold to the highest bidder. The Board of Commissioners will be informed of the outcome of the sale.

At the discretion of the Director or the Board of Commissioners, vehicles and other property may also be sold at auction.

For Property with value greater than \$1,000.00 – disposition will follow the same procedures as property with value greater than \$300.00 but less than \$1,000.00 but must have Board approval before any transfer of title or ownership occurs.

The Cash Handling section, *Sale of Property and Miscellaneous Proceeds*, specifies how the proceeds shall be handled and recorded. All money received from the above sales will be deposited into the appropriate general account.

IV. INVESTMENTS

The St. Joseph Housing Commission recognizes that it must invest its funds in a manner, which will provide the highest investment return with the maximum security while meeting the daily cash flow needs of the Commission. It must also comply with all Federal and State statutes governing the investment of public funds.

Scope

This investment policy applies to all financial assets of the St. Joseph Housing Commission.

Objectives: Safety, Diversification, Liquidity and Return on Investment

The primary objectives, in priority order, of the St. Joseph Housing Commission's investment activities shall be:

- A. *Safety*** - Safety of principal is the foremost objective of the investment program. Investments shall be undertaken in a manner that seeks to insure the preservation of capital in the overall portfolio.
- B. *Diversification*** - The Director shall diversify the use of investment instruments to avoid incurring unreasonable risks inherent in over-investment in specific instruments, individual financial institutions or maturities.

- C. **Liquidity** - The investment portfolio shall remain sufficiently liquid to meet all operating requirements that may be reasonably anticipated.
- D. **Return on Investments** - The investment portfolio shall be designed with the objective of obtaining a rate of return throughout the budgetary and economic cycles, taking into account the investment risk constraints and the cash flow characteristics of the portfolio.
- E. **Delegation of Authority** - Authority to manage the investment program is derived from the following: Act No. 20 of the Public Acts of Michigan of 1943 as amended and St. Joseph Housing Commissioner Charter, Chapter VIII, Section 8.6. Management responsibility for the investment program is hereby delegated to the Director, who shall establish written procedures and internal controls for the operation of the investment program consistent with this investment policy. Procedures should include references to: safekeeping, delivery vs. payment, investment accounting, repurchase agreements, wire transfer agreements, collateral/depository agreements and banking service contracts. No person may engage in an investment transaction except as provided under the terms of this policy and the procedures established by the Director. The Director shall be responsible for all transactions undertaken and shall establish a system of controls to regulate the activities of subordinate officials.

List of Authorized Investments - The St. Joseph Housing Commission is limited to investments authorized by Act 20 of 1943, as amended, including the following:

- A. Daily money market mutual funds registered under the Investment Company Act of 1940, Title I, Chapter 686, 54Stat. 789, 15 U.S.C. 80a-1 to 80a-3 and 80a-4 to 80a-64, invested in bonds, securities and other obligations of the United States or an agency or instrumentality of the United States.
- B. Certificates of deposit of a bank which is a member of the Federal Deposit Insurance Corporation and which are also eligible to be a depository of surplus funds belonging to the state under 5 or 6 of Act 105 of the Public Acts of 1855, as amended, being 21.145 and 21.146 of the Michigan Compiled Laws.
- C. Commercial paper rated at the time of purchase within the two highest classifications by not less than two standard rating services and which matures not more than 270 days after the date of purchase.
- D. United States government or federal agency obligation repurchase agreements.
- E. Banker's acceptances of United States banks.
- F. Investment pools composed of investment vehicles which are legal for direct investments by local units of government in Michigan and in accordance with Act No. 367 of the Public Acts of 1982.

Qualified Institutions - The St. Joseph Housing Commission shall maintain a list of financial institutions, which are approved for investment purposes. In addition, a list of approved security

broker/dealers selected by creditworthiness will also be maintained. All financial institutions and broker/dealers who desire to become qualified for investment transactions must supply the following as appropriate:

Audited financial statements

Proof of National Association of Securities Dealers certification

Proof of state registration

Completed broker/dealer questionnaire

Certification of having read and understood and agreeing to comply with the St. Joseph Housing Commissions investment policy.

Safekeeping and Custody - All security transactions, including collateral for repurchase agreements and financial institution deposits, entered into by the St. Joseph Housing Commission shall be on a cash basis. Securities may be held by a third party custodian designated by the Director and evidenced by safekeeping receipts as determined by the Director.

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

V. PAYROLL

The payroll for employees of the St. Joseph Housing Commission is processed by the city of St. Joseph. The Housing Commission has the responsibility for the accurate and timely reporting of the hours worked for its employees. The Office Manager has the primary responsibility of recording and completing the time sheets to process the payroll. The Office Manager will:

1. Record vacations, holidays, sick days, etc. on a log for each pay period for all employees when it becomes known.
2. Gather the time sheets from employees on the day payroll is processed.
3. Compare the log to the time sheet that each employee submits and clarify any discrepancies.
4. Record all activities on the city's payroll sheets.
5. Submit all time sheets to the Director who will review the timesheets and also sign.
6. Make copies of the city's payroll sheets for St. Joseph Housing Commission records.
7. Submit the payroll sheets to the city.

The City will maintain all accruals (e.g. vacation time, holidays, sick days, etc.), which are owed to the employees of St. Joseph Housing Commission. Periodically, the Director will review the accruals with City personnel staff for accuracy.

The City will send an invoice to the Housing Commission for the cost of all payroll expenses including a processing fee. The Director will review the invoice and check for its accuracy and approve the invoice for payment in writing. The Director will then have the invoice paid through normal expense processing.

VI. FINANCIAL REPORTING

A. Regular Reporting

The Director shall compile financial reports for review by the Board of Commissioners at each meeting. The reports shall include:

1. Check registers for the Public Housing program which displays all expenses paid for the month;
2. Reports prepared by the fee accountant which include a balance sheet, and totals for individual items on the budget;
3. An operating budget which displays the income and expenses of each program on a monthly basis.

The Commissioners shall review each report. They shall approve the expenses by vote. The Commissioners shall also have the authority to question any costs and request any supporting documentation they consider necessary.

B. Auditing Reporting

The St. Joseph Housing Commission will have an independent audit completed annually. The auditors shall be selected by a bid process and shall enter into a contract with the St. Joseph Housing Commission. The responsibility of the auditors is to accurately audit, test and disclose any findings to the Board of Commissioners and to the Department of Housing and Urban Development through its completion of an audit report.

VII. SECURITY

The St. Joseph Housing Commission recognizes the importance of securing its financial instruments. To meet this objective, the St. Joseph Housing Commission will adhere to the following:

- A. Blank Checks:** All blank checks shall be stored in a secure and locked area. The Director shall be the custodian of the checks. All checks shall be secured when not being used. Offices where the checks are stored shall be locked when not in use.
- B. Signature Stamps:** The Director shall be responsible for the storage of the signature stamps. At no time are the stamps to be stored with the checks. Staff needing the stamps must request them from the Director/Designee and immediately return them to the

Director/Designee when the check stamping is complete. The signature stamps must be secured when not in use.

VIII. IMPLEMENTATION

This Internal Control policy obsoletes the current policies as it incorporates them into this document:

- Capitalization Policy
- Check Signing Policy
- Disposition Policy
- Funds Transfer Policy
- Investment Policy
- Uncollectable Tenant Accounts Policy

The St. Joseph Housing Commission Board of Commissioners must approve any changes in the Internal Control Policy.

Adopted by Resolution 188 by the St. Joseph Housing Commission on July 10, 2008.

Permission to Purchase St. Joseph Housing Commission Owned Property

I, _____, hereby offer to purchase the following item(s) from the St. Joseph Housing Commission.

Quantity	Description	Amount Per item	Total
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
_____	_____	\$ _____	\$ _____
		Grand Total	\$ _____

Employee Signature: _____ Date: _____

Signatures below also indicate the price is reasonable.

Director Approval: _____ Date: _____

Board Approval: _____ Date: _____
(If required)

ATTACHMENT B

COMMUNITY SERVICE AND SELF SUFFICIENCY POLICY

I. Background

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes or other activities that help an individual toward self sufficiency and economic independence. This is a requirement of the Public Housing Dwelling Lease.

II. Definitions

A. Community Service – volunteer work which includes, but is not limited to:

- Work at a local institution including but not limited to: school, child care center, hospital, hospice, recreation center, senior center, adult day care center, homeless shelter, indigent feeding program, cooperative food bank, etc.;
- Work with a non-profit organization that serves Housing Commission residents or their children such as: Boy Scouts, Girl Scouts, Boys or Girls clubs, 4-H program, PAL, Garden Center, Community clean-up program, beautification programs, other youth or senior organizations;
- Work at the Housing Commission to help improve physical conditions;
- Work at the Housing Commission to help with children’s programs;
- Work at the Housing Commission to help with senior programs;
- Helping neighborhood groups with special projects;
- Working through resident organization to help other residents with problems, serving as an officer in a Resident organization, serving on the Resident Advisory Board; and,
- Caring for the children of other residents so they may volunteer.

NOTE: Political activity is excluded.

B. Self Sufficiency Activities – activities that include, but are not limited to:

- Job readiness programs;

- Job training programs;
- GED classes;
- Substance abuse or mental health counseling;
- English proficiency or literacy (reading) classes;
- Apprenticeships;
- Budgeting and credit counseling;
- Any kind of class that helps a person toward economic independence; and
- Full time student status at any school, college or vocational school.

C. Exempt Adult - an adult member of the family who:

- Is 62 years of age or older;
- Has a disability that prevents him/her from being gainfully employed;
- Is the caretaker of a disabled person;
- Is working at least 30 hours per week; or
- Is participating in a welfare to work program.

III. Requirements of the Program

- A. The eight (8) hours per month may be either volunteer work or self sufficiency program activity, or a combination of the two.
- B. At least eight (8) hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant special consideration. The Housing Commission will make the determination of whether to allow or disallow a deviation from the schedule.
- C. Activities must be performed within the community and not outside the jurisdictional area of the Housing Commission.
- D. Family obligations
- At lease execution or re-examination after February 1, 2000, all adult members (18 or older) of a public housing resident family must:

1. provide documentation that they are exempt from Community Service requirement if they qualify for an exemption, and
 2. sign a certification that they have received and read this policy and understand that if they are not exempt, failure to comply with the Community Service requirement will result in nonrenewal of their lease.
- At each annual re-examination, non-exempt family members must present a completed documentation form of activities performed over the previous twelve (12) months. This form will include places for signatures of supervisors, instructors, or counselors certifying to the number of hours contributed.
 - If a family member is found to be noncompliant at re-examination, he/she and the Head of Household will sign an agreement with the Housing Commission to make up the deficient hours over the next twelve (12) month period.

E. Change in exempt status:

- If, during the twelve (12) month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to the Housing Commission and provide documentation of such.
- If, during the twelve (12) month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to the Housing Commission. The Housing Commission will provide the person with the Recording/Certification documentation form and a list of agencies in the community that provide volunteer and/or training opportunities.

IV. Housing Commission Obligations

A. To the greatest extent possible and practicable, the Housing Commission will:

- Provide names and contacts at agencies that can provide opportunities for residents, including disabled, to fulfill their Community Service obligation; and
- Provide in-house opportunities for volunteer work or self sufficiency programs.

B. The Housing Commission will provide the family with exemption verification forms and Recording/Certification documentation forms and a copy of this policy at initial application and at lease execution.

C. The Housing Commission will make the final determination as to whether or not a family member is exempt from the Community Service requirement. Residents may use the Housing Commission's Grievance Procedure if they disagree with the Housing Commission's determination.

D. Noncompliance of family member:

- At least thirty (30) days prior to annual re-examination and/or lease expiration, the Housing Commission will begin reviewing the exempt or non-exempt status and compliance of family members;
- If the Housing Commission finds a family member to be noncompliant, the Housing Commission will enter into an agreement with the noncompliant member and the Head of Household to make up the deficient hours over the next twelve (12) month period;
- If, at the next annual re-examination, the family member still is not compliant, the lease will not be renewed and the entire family will have to vacate, unless the noncompliant member agrees to move out of the unit;
- The family may use the Housing Commission's Grievance Procedure to protest the lease termination.

ATTACHMENT C

VIOLENCE AGAINST WOMEN ACT (VAWA) POLICY

I. Purpose and Applicability

The purpose of this policy (herein called “Policy”) is to implement the applicable provisions of the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) and more generally to set forth the St. Joseph Housing Commission’s policies and procedures regarding domestic violence, dating violence, and stalking, as hereinafter defined.

This Policy shall be applicable to the administration by the St. Joseph Housing Commission of all federally subsidized public housing under the United States Housing Act of 1937 (42 U.S.C. § 1437 *et seq.*). Notwithstanding its title, this policy is gender-neutral, and its protections are available to males who are victims of domestic violence, dating violence, or stalking as well as female victims of such violence.

II. Goals and Objectives

This Policy has the following principal goals and objectives:

- A. Maintaining compliance with all applicable legal requirements imposed by VAWA;
- B. Ensuring the physical safety of victims of actual or threatened domestic violence, dating violence, or stalking who are assisted by the St. Joseph Housing Commission;
- C. Providing and maintaining housing opportunities for victims of domestic violence, dating violence, or stalking;
- D. Creating and maintaining collaborative arrangements between the St. Joseph Housing Commission, law enforcement authorities, victim service providers, and others to promote the safety and well-being of victims of actual and threatened domestic violence, dating violence, and stalking, who are assisted by the St. Joseph Housing Commission; and
- E. Taking appropriate action in response to an incident or incidents of domestic violence, dating violence, or stalking, affecting individuals assisted by the St. Joseph Housing Commission.

III. Other St. Joseph Housing Commission Policies and Procedures

This Policy shall be referenced in and attached to the St. Joseph Housing Commission's Five-Year Public Housing Agency Plan and shall be incorporated in and made a part of the St. Joseph Housing Commission's Admissions and Continued Occupancy Policy. The St. Joseph Housing Commission's annual public housing agency plan shall also contain information concerning the St. Joseph Housing Commission's activities, services or programs relating to domestic violence, dating violence, and stalking.

To the extent any provision of this policy shall vary or contradict any previously adopted policy or procedure of the St. Joseph Housing Commission, the provisions of this Policy shall prevail.

IV. Definitions

As used in this Policy:

- A. *Domestic Violence*: The term "domestic violence" includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim share a child in common, by a person who is cohabitated with or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the State of Michigan receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the State of Michigan.
- B. *Dating Violence*: Violence committed by a person: (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.
- C. *Stalking*: to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person; (ii) a member of the immediate family of that person; or (iii) the spouse or intimate partner of that person.
- D. *Immediate Family Member*: a spouse, parent, brother or sister, or child of the person, or an individual to whom that person stands in loco parentis (in place of a parent); or any other person living in the household of that person and related to that person by blood or marriage.
- E. *Perpetrator*: a person who commits an act of domestic violence, dating violence or stalking against a victim.

V. Admission and Screening

- A. *Non-Denial of Assistance.* The St. Joseph Housing Commission will not deny admission to public housing to any person because that person is or has been a victim of domestic violence, dating violence, or stalking, provided that such person is otherwise qualified for such admission.
- B. *Mitigation of Disqualifying Information:* When so requested in writing by an applicant for assistance whose history includes incidents in which the applicant was a victim of domestic violence, the St. Joseph Housing Commission may, but shall not be obligated to, take such information into account in mitigation of potentially disqualifying information, such as poor credit history or previous damage to a dwelling. If requested by an applicant to take such mitigating information into account, the St. Joseph Housing Commission shall be entitled to conduct such inquiries as are reasonably necessary to verify the claimed history of domestic violence and its probable relevance to the potentially disqualifying information. The St. Joseph Housing Commission will not disregard or mitigate potentially disqualifying information if the applicant household includes a perpetrator of a previous incident or incidents of domestic violence.

VI. Termination of Tenancy or Assistance

- A. *VAWA Protections.* Under VAWA, public housing residents have the following specific protections, which will be observed by the St. Joseph Housing Commission.
1. An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be considered to be a serious or repeated violation of the Lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of or assistance to the victim of that violence.
 2. In addition to the foregoing, tenancy or assistance will not be terminated by the St. Joseph Housing Commission as a result of criminal activity, if that criminal activity is directly related to domestic violence, dating violence or stalking engaged in by a member of the assisted household, a guest or another person under the tenant's control, and the tenant or an immediate family member is the victim or threatened victim of this criminal activity. However, the protection against termination of tenancy or assistance described in this paragraph is subject to the following limitations:
 - (a) Nothing contained in this paragraph shall limit any otherwise available authority of the St. Joseph Housing Commission to terminate tenancy, evict, or to terminate assistance, as the case may be, for any violation of a Lease or program requirement not premised on the act or acts of domestic violence, dating violence, or stalking in question against the tenant or a member of the

tenant's household. However, in taking any such action, neither may the St. Joseph Housing Commission apply a more demanding standard to the victim of domestic violence, dating violence or stalking than that applied to other tenants. A victim resident who allows a perpetrator to violate a court order relating to the act or acts of violence is subject to eviction. A victim resident who allows a perpetrator, who has been barred from the St. Joseph Housing Commission property, to come onto St. Joseph Housing Commission property, including but not limited to the victim's apartment and any other area under their control, is subject to eviction.

(b) Nothing contained in this paragraph shall be construed to limit authority of the St. Joseph Housing Commission to evict or terminate from assistance any tenant or lawful applicant if the owner, manager or the St. Joseph Housing Commission, as the case may be, can demonstrate an actual and imminent threat to other tenants or to those employed at or providing service to the property, if the tenant is not evicted or terminated from assistance.

B. *Removal of Perpetrator.* Further, notwithstanding anything in paragraph VI.A.2 or federal, state or local law to the contrary, the St. Joseph Housing Commission may bifurcate a Lease, or remove a household member from a Lease, without regard to whether a household member is a signatory to a Lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in acts of physical violence against family members or others. Such action against the perpetrator of such physical violence may be taken without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also the tenant or a lawful occupant. Such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by law applicable to terminations of tenancy and evictions by the St. Joseph Housing Commission. Leases used for all public housing operated by the St. Joseph Housing Commission shall contain provisions setting forth the substance of this paragraph.

VII. Verification of Domestic Violence, Dating Violence or Stalking

A. *Requirement for Verification.* The law allows, but does not require, the St. Joseph Housing Commission to verify that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking claimed by a tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. Subject only to waiver as provided in paragraph VII.C., the St. Joseph Housing Commission shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by the St. Joseph Housing Commission.

Verification of a claimed incident or incidents of actual or threatened domestic violence, dating violence or stalking may be accomplished in one of the following three ways:

1. *HUD-approved form* – by providing to the St. Joseph Housing Commission, a written certification, on a form approved by the U.S. Department of Housing and Urban Development (HUD), that the individual is a victim of domestic violence, dating violence or stalking, and that the incident or incidents in question are bona fide incidents of actual or threatened abuse meeting the requirements of the applicable definition(s) set forth in this policy. The incident or incidents in question must be described in reasonable detail as required in the HUD-approved form, and the completed certification must include the name of the perpetrator.
 2. *Other documentation* – by providing to the St. Joseph Housing Commission documentation signed by the employee, agent, or volunteer of a victim service provider, attorney, or a medical professional, from whom the victim has sought assistance in addressing the domestic violence, dating violence or stalking, or the effects of the abuse, described in such documentation. The professional providing the documentation must sign and attest under penalty of perjury to the professional's belief that the incident or incidents in question are bona fide incidents of abuse meeting the requirements of the applicable definition(s) set forth in this policy. The victim of the incident or incidents of domestic violence, dating violence or stalking described in the documentation must also sign and attest to the documentation under penalty of perjury.
 3. *Police or court record* – by providing the St. Joseph Housing Commission a federal, state, tribal, territorial or local police or court record describing the incident or incidents in question.
- B. *Time allowed to provide verification/failure to provide.* An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is requested by the St. Joseph Housing Commission to provide verification, must provide such verification within 14 business days (i.e., 14 calendar days, excluding Saturdays, Sundays, and federally-recognized holidays) after receipt of the request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action.
- C. *Waiver of verification requirement.* The Executive Director of the St. Joseph Housing Commission may, with respect to any specific case, waive the above-stated requirements for verification and provide the benefits of this policy based on the victim's statement or other corroborating evidence. Such waiver may be granted in the sole discretion of the Executive Director, or his or her designee. Any such waiver must be in writing. Waiver in a particular instance or instances shall not operate as precedent for, or create any right to, waiver in any other case or cases, regardless of similarity in circumstances.

VIII. Confidentiality

A. *Right of confidentiality.* All information (including the fact that an individual is a victim of domestic violence, dating violence or stalking) provided the St. Joseph Housing Commission in connection with a verification required under Section VII of this policy or provided in lieu of such verification where a waiver of verification is granted, shall be retained by the St. Joseph Housing Commission in confidence and shall neither be entered in any shared database nor provided to any related entity, except where disclosure is:

1. requested or consented to by the individual in writing, or
2. required for use in a public housing eviction proceeding or in connection with termination of assistance, as permitted in VAWA, or
3. otherwise required by applicable law.

B. *Notification of rights.* All tenants of public housing administered by the St. Joseph Housing Commission shall be notified in writing concerning their right to confidentiality and the limits on such rights to confidentiality.

IX. Court Orders

It is the St. Joseph Housing Commission's policy to honor orders entered by courts of competent jurisdiction affecting individuals assisted by the St. Joseph Housing Commission and their property. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

X. Relationships with Service Providers

It is the policy of the St. Joseph Housing Commission to cooperate with organizations and entities, both private and governmental, which provide shelter and/or services to victims of domestic violence. If the St. Joseph Housing Commission staff becomes aware that an individual assisted by the St. Joseph Housing Commission is a victim of domestic violence, dating violence or stalking, the St. Joseph Housing Commission will refer the victim to such providers of shelter or services as appropriate. Notwithstanding the foregoing, this policy does not create any legal obligation requiring the St. Joseph Housing Commission either to maintain a relationship with any particular provider of shelter or services to victims of domestic violence or to make a referral in any particular case. The St. Joseph Housing Commission's annual public housing agency plan shall describe providers of shelter or services to victims of domestic violence with which the St. Joseph Housing Commission has referral or other cooperative relationships.

XI. Notification

The St. Joseph Housing Commission shall provide written notification to applicants and tenants concerning the rights and obligations created under VAWA relating to confidentiality, denial of assistance and, termination of tenancy or assistance.

XII. Relationship with Other Applicable Laws

Neither VAWA nor this policy implementing it shall preempt or supersede any provision of federal, state or local law that provides greater protection than that provided under VAWA for victims of domestic violence, dating violence or stalking.

XIII. Amendment

This policy may be amended from time to time by the St. Joseph Housing Commission as approved by the St. Joseph Housing Commission Board.

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and Annual PHA Plan for the PHA fiscal year beginning April 1, 2010, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan 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.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

St. Joseph Housing Commission
PHA Name

MI046
PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 2010 - 2014

Annual PHA Plan for Fiscal Years 2010

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
Marian Finkler	President, St. Joseph Housing Commission
Signature	Date
	January 15, 2010

Civil Rights Certification

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Civil Rights Certification**Annual Certification and Board Resolution**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

The PHA 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.

St. Joseph Housing Commission

MI046

PHA Name

PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Marian Finkler

Title

St. Joseph Housing Commission Board President

Signature



Date

01/15/2010

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

St. Joseph Housing Commission

Program/Activity Receiving Federal Grant Funding

Operating Subsidy, Capital Fund Program

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

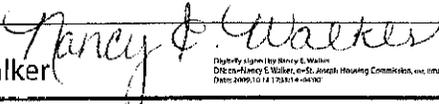
g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official Nancy E. Walker		Title Executive Director
Signature X Nancy E. Walker 		Date January 15, 2010

Digitally signed by Nancy E. Walker
DN: cn=Nancy E. Walker, o=St. Joseph Housing Commission, email=nhgcom@stjoh.org, c=US
Date: 2010.01.15 17:30:14 -0500

Certification of Payments to Influence Federal Transactions

U.S. Department of Housing
and Urban Development
Office of Public and Indian Housing

Applicant Name

St. Joseph Housing Commission

Program/Activity Receiving Federal Grant Funding

Operating Subsidy, Capital Fund Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Nancy E. Walker

Title

Executive Director

Signature

Nancy E. Walker

Digitally signed by Nancy E. Walker
DN: cn=Nancy E. Walker, o=St. Joseph Housing Commission, ou,
email=sjhgcom@sbqglobal.net, c=US
Date: 2009.10.18 17:34:55 -0400

Date (mm/dd/yyyy)

01/15/2010

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

(See page 3 for public burden disclosure)

1. Type of Federal Action: N/A a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance	2. Status of Federal Action: a. bid/offer/application b. initial award c. post-award	3. Report Type: a. initial filing b. material change For material change only: Year quarter Date of last report
4. Name and Address of Reporting Entity: <input type="checkbox"/> Prime <input type="checkbox"/> Sub-awardee Tier , if Known: St. Joseph Housing Commission 601 Port Street St. Joseph, MI 49085 Congressional District, if known: 06	5. If Reporting Entity in No. 4 is Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency:	7. Federal Program Name/Description: CFDA Number, if applicable:	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI):	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI):	
11. Amount of Payment (check all that apply): \$ <input type="checkbox"/> actual <input type="checkbox"/> planned	12. Form of Payment (check all that apply): <input type="checkbox"/> a. cash <input type="checkbox"/> b. in-kind; specify: nature value	
13. Type of Payment (check all that apply): <input type="checkbox"/> a. retainer <input type="checkbox"/> b. one-time fee <input type="checkbox"/> c. commission <input type="checkbox"/> d. contingent fee <input type="checkbox"/> e. deferred <input type="checkbox"/> f. other; specify	15. Continuation Sheet(s) SF-LLL-A attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
14. Brief Description of Services Performed or to be Performed and Date(s) of Service, including officer(s), employee(s), or Member(s) contacted for Payment indicated in item 11: attach Continuation Sheet(s) SF-LLL-A, if necessary		
16. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: <u>Nancy E. Walker</u> Print Name: Nancy E. Walker Title: Executive Director Telephone No.: (269) 983-2814 Date: 01/15/10	
Federal Use Only	Authorized for Local Reproduction Standard Form - LLL (Rev. 10-00)	

Solicitation No.

Offeror:

Attachment No.

Approved by OMB
0348-0046

**DISCLOSURE OF LOBBYING ACTIVITIES
CONTINUATION SHEET**

Reporting Entity: St. Joseph Housing Commission

Page of

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Standard Form - LLL-A (Rev. 10-00)

MINUTES OF A REGULAR MEETING
OF THE ST. JOSEPH HOUSING COMMISSION
RESIDENT ADVISORY BOARD
OF THE CITY OF ST. JOSEPH, MICHIGAN
HELD ON TUESDAY, NOVEMBER 10, 2009, AT 10:00 A.M.

Executive Director Nancy Walker called the meeting to order.

Present: Board Members: Frank Byrd (1102), Howard Hutchinson (1003), Billie Packard (1205) and Mary Wein (501).

Residents: Dorothy Seymour (204), Van Taylor (406), Jeff Sunday and Josh Harvath (407), Lester Wein (501), Dawn Pesko (506), John Walker (708), Willie Enix (801), James Williams (805), Doris Tiefenbach (901), Wallace Dahms (902), Ruth Magner (1101), Phyllis Nutt (1105), Anne Lavoy (1402), Ruth Eggers (1404), Evelyn Brown (1501)

Director Nancy Walker and the Resident Advisory Board reviewed the Five-Year Plan for Fiscal Years 2010-2014. There were no objections with the items that were budgeted.

Several items that were submitted by residents verbally and in writing were incorporated into the current plan, i.e. replacing the bifold doors in the apartments; new ADA water coolers on the 1st and 15th floors; landscaping the grounds and purchasing new outdoor furniture; and installing new apartment door handles and dead-locks. Other items listed in the Plan were as follows: installing set-back heat thermostats in the apartments; replacing incandescent light bulbs with CFLs in all apartment light fixtures; sealcoating and striping the parking lots; and new solid balcony and screen doors in the apartments.

There were many items discussed at this meeting for improvements – some were basically management considerations or maintenance-type improvements and some were capital improvements that the Board felt should be considered for grant fund expenditures.

The items considered maintenance or management decisions were as follows: sanitizer dispensers in common areas; a machine that sells soap, softener and bleach installed in the laundry room; a coin machine in the laundry room; placing all smokers on the same floor and a vending machine with sandwiches and food; installing a suggestion box; and First Aid classes. Management will investigate these items.

Other capital items discussed but not placed in the Plan are as follows: new intercom system with volume control; placing a gazebo in the back yard; a handicap ramp at the stairs coming up from the park in back of the building; new window and door screens; refurbish kitchen and bathroom cabinets; a storage area for battery operated chairs and bicycles; extend the 1st floor community room farther out into the patio; make apartment window sills larger; and installing double sinks in the apartment kitchens. Even though not included in the current plan, these ideas will be kept in mind for future projects.

Being no further business, the meeting was adjourned by Director Walker at 11:30 a.m.

Respectfully submitted,

Nancy E. Walker
Executive Director

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant: 2007	
PHA Name: St. Joseph Housing Commission		Capital Fund Program Grant No. M33P04650107 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant Approval: 2007	
Type of Grant		Revised Annual Statement (revision no:3)			
<input type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Final Performance and Evaluation Report			
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:3)			
Summary by Development Account		Total Estimated Cost		Total Actual Cost ¹	
Line		Original	Revised ²	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	10,807.00	11,390.00	11,390.00	11,390.00
3	1408 Management Improvements	3,000.00	3,000.00	1,170.00	1,277.89
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	4,200.00	29,200.00	29,200.00	24,895.37
8	1440 Site Acquisition				
9	1450 Site Improvement	2,738.00	4,266.40		
10	1460 Dwelling Structures	84,030.00	57,458.02	57,458.02	57,458.02
11	1465.1 Dwelling Equipment—Nonexpendable	2,500.00	7,780.58	2,780.58	2,780.58
12	1470 Non-dwelling Structures	800.00	800.00	800.00	800.00
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFF Grants for operations.
⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2007 FFY of Grant Approval: 2007	
PHA Name: St. Joseph Housing Commission	Grant Type and Number Capital Fund Program Grant No: M33P04650107 Replacement Housing Factor Grant No: Date of CFFP:		
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 3) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Revised ² Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		Expended
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	108,075.00	102,798.60
21	Amount of line 20 Related to LBP Activities	113,895.00	98,601.86
22	Amount of line 20 Related to Section 504 Activities	1,185.00	
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director Nancy E. Walker		Signature of Public Housing Director	
1/15/10		Date	

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part II: Supporting Pages		Federal FFY of Grant: 2007					
PHA Name: St. Joseph Housing Commission		Grant Type and Number Capital Fund Program Grant No: MI33P04650107 CHFP (Yes/No): Replacement Housing Factor Grant No:					
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost	Total Actual Cost	Status of Work	
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²
MIO46-HA Wide	Operations	1406		10,807.00	11,390.00	11,390.00	11,390.00
	Management Improvements-Education	1408		3,000.00	3,000.00	1,170.00	1,277.89
	A/E Consultant Fees	1430		4,200.00	29,200.00	29,200.00	24,895.37
	Sealcoat/Stripe Rear Upper Lot	1450		1,938.00	4,266.40		
	Site Drain Improvements	1450		800.00	0.00		
	Replace Metal Bifold Closet Doors-Apts.	1460		54,000.00	0.00		
	Asbestos Removal/Boiler Room	1460		20,200.00	5,175.00	5,175.00	5,175.00
	Replace Carpet/Vinyl Wall Base-1 st Floor Community Room	1460		2,000.00	0.00		
	Replace Wall/Base Cabinets-Kitchen	1460		6,400.00	0.00		
	Replace Single Bowl Kitchen Sink	1460		500.00	0.00		
	Replace Triple Bowl Kitchen Sink	1460		930.00	0.00		
	General Shed Maintenance	1470		800.00	800.00	800.00	800.00
	Purchase Refrigerators	1465.1		2,500.00	5,000.00		
	Replace Lighting/Fans-15 th Floor Lounge	1460		0.00	898.02	898.02	898.02
	Replace TV/VCR-1 st Floor Comm. Room	1465.1		0.00	2,349.96	2,349.96	2,349.96
	Replace P.A. System-1 st Floor Comm Rm	1465.1		0.00	0.00		
	Boiler Improvements	1460		0.00	50,200.00	50,200.00	50,200.00
	Replace Water Cooler-ADA Front Lobby	1460		0.00	1,185.00	1,185.00	1,185.00
	Replace Outdoor Furniture	1475		0.00	0.00		

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant: 2008	
PHA Name:		Capital Fund Program Grant No: M133P04650108		FFY of Grant Approval: 2008	
St. Joseph Housing Commission		Replacement Housing Factor Grant No:			
Date of CFFP:					
Type of Grant		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no: 1)	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Original	Total Estimated Cost	Obligated	Total Actual Cost ¹
			Revised ²		Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	11,390	12,020		
3	1408 Management Improvements	5,505	5,505		
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	5,000	5,000		
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	89,000	94,686		
11	1465.1 Dwelling Equipment—Nonexpendable	3,000	3,000		
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2008 FFY of Grant Approval: 2008	
PHA Name: St. Joseph Housing Commission	Grant Type and Number Capital Fund Program Grant No. MI33P04650108 Replacement Housing Factor Grant No. Date of CFFP:		
Type of Grant	<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
18a	1501 Collateralization of Debt Service paid by the PHA		
18ba	9000 Collateralization of Debt Service paid Via System of Direct Payment.		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	113,895	120,211
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature 1/15/10	Director Nancy E. Walker <i>Nancy E. Walker</i>	Signature of Public Housing Director	Date

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2009 FFY of Grant Approval: 2009	
PHA Name:	Grant Type and Number		
St. Joseph Housing Commission	Capital Fund Program Grant No: M133PS04650109 Replacement Housing Factor Grant No: Date of CFFP:		
Type of Grant			
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Revised Annual Statement (revision no:)	
<input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
1	Total non-CFFP Funds		Expended
2	1406 Operations (may not exceed 20% of line 21) ³		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures	152,163	
11	1465.1 Dwelling Equipment—Nonexpendable		
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition		
15	1492 Moving to Work Demonstration		
16	1495.1 Relocation Costs		
17	1499 Development Activities ⁴		

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 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
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U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary		FFY of Grant: 2009 FFY of Grant Approval: 2009			
PHA Name: St. Joseph Housing Commission	Grant Type and Number Capital Fund Program Grant No: MIB33S04650109 Replacement Housing Factor Grant No: Date of CFFP:				
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Summary by Development Account <input type="checkbox"/> Final Performance and Evaluation Report					
Line		Total Estimated Cost	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	152,163			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director Nancy E. Walker		Signature of Public Housing Director		Date	
1/15/10 <i>Nancy E. Walker</i>					

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant: 2009	
PHA Name:		Capital Fund Program Grant No: MB3P04650109		FFY of Grant Approval: 2009	
St. Joseph Housing Commission		Replacement Housing Factor Grant No:			
		Date of CFFP:			
Type of Grant	<input checked="" type="checkbox"/> Original Annual Statement	<input type="checkbox"/> Reserve for Disasters/Emergencies	<input type="checkbox"/> Revised Annual Statement (revision no:)		
	<input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Obligated	Total Actual Cost ¹	
		Original	Revised ²		Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	12,000			
3	1408 Management Improvements	3,325			
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit	3,500			
6	1415 Liquidated Damages				
7	1430 Fees and Costs	4,000			
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	94,000			
11	1465.1 Dwelling Equipment—Nonexpendable	3,000			
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

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 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2009 FFY of Grant Approval: 2009	
PHA Name: St. Joseph Housing Commission	Grant Type and Number Capital Fund Program Grant No: MB3P04650109 Replacement Housing Factor Grant No: Date of CFFP:		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Revised ²
18a	1501 Collateralization or Debt Service paid by the PHA		Expended
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	119,825	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director Nancy E. Walker		Signature of Public Housing Director	
1/15/10 <i>Nancy E. Walker</i>		Date	
		Date	

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2010 FFY of Grant Approval: 2010	
PHA Name:	Grant Type and Number		
St. Joseph Housing Commission	Capital Fund Program Grant No: MB3P0460110 Replacement Housing Factor Grant No: N/A Date of CFFP: N/A		
Type of Grant	<input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Original Annual Statement and Evaluation Report for Period Ending:		
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Obligated
1	Total non-CFP Funds		
2	1406 Operations (may not exceed 20% of line 21) ³	20,000	
3	1408 Management Improvements	5,000	
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs	6,000	
8	1440 Site Acquisition		
9	1450 Site Improvement	15,000	
10	1460 Dwelling Structures	70,225	
11	1465.1 Dwelling Equipment--Nonexpendable	3,600	
12	1470 Non-dwelling Structures		
13	1475 Non-dwelling Equipment		
14	1485 Demolition		
15	1492 Moving to Work Demonstration		
16	1495.1 Relocation Costs		
17	1499 Development Activities ⁴		

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

Part I: Summary		FFY of Grant: 2010 FFY of Grant Approval: 2010	
PHA Name: St. Joseph Housing Commission	Grant Type and Number Capital Fund Program Grant No: MI33P04650110 Replacement Housing Factor Grant No: N/A Date of CFFP: N/A		
Type of Grant		<input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost ¹
		Original	Revised ²
		Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	119,825	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs	40,000	
25	Amount of line 20 Related to Energy Conservation Measures	30,225	
Signature of Executive Director Nancy E. Walker		Signature of Public Housing Director	
1/15/10		Date	

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Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

Part I: Summary						
PHA Name/Number: St. Joseph Housing Commission - MI046		Locality (City/County & State) St. Joseph, Berrien County, MI			<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
A.	Development Number and Name	Work Statement for Year 1 FFY 2010	Work Statement for Year 2 FFY 2011	Work Statement for Year 3 FFY 2012	Work Statement for Year 4 FFY 2013	Work Statement for Year 5 FFY 2014
B.	Physical Improvements Subtotal	Annual Statement	86,300	87,825	90,000	85,825
C.	Management Improvements		3,000	7,000	5,000	9,000
D.	PHA-Wide Non-dwelling Structures and Equipment					
E.	Administration					
F.	Other: Fees & Costs		10,525	5,000	4,825	5,000
G.	Operations		20,000	20,000	20,000	20,000
H.	Demolition					
I.	Development					
J.	Capital Fund Financing – Debt Service					
K.	Total CFP Funds					
L.	Total Non-CFP Funds					
M.	Grand Total	119,825	119,825	119,825	119,825	119,825

