

*LEWISTON HOUSING
BOARD OF COMMISSIONERS
TELECONFERENCE MEETING
TUESDAY, October 29, 2024 AT 5:00 PM – VIA MS TEAMS
AGENDA*

- I. Roll Call*
- II. Approval of the September 24, 2024 meeting minutes, October 7, 2024 special meeting minutes, and October 16, 2024 annual meeting minutes (pages 2-5)*
- III. Financial Update*
- IV. Consent Agenda: Operational & Director Reports (pages 6-15)*
- V. New Business*
 - a. Approval for 104 Park loan amendment*
 - b. Conflict of Interest Policy approval (pages 16-19)*
 - c. Whistleblower Protection Policy approval (page 20)*
- VI. Date for next teleconference meeting – Tuesday, November 26, 2024 at 5:00 pm*
- VII. Open Forum*
- VIII. Executive Session: Discussion or consideration of the condition, acquisition, or the use of real property or personal property permanently attached to real property: 1MRSA 405(6)(c)*
- IX. Adjournment*

*LEWISTON HOUSING
BOARD OF COMMISSIONERS
TELECONFERENCE MEETING
TUESDAY, September 24, 2024, AT 5:00 PM – VIA MS TEAMS
Meeting Minutes*

I. Roll Call – Meeting called to order at 5:05pm

Marc Pellerin, Jon Hussey, Guy Gagnon, Hassan Bouh, Muhidin Libah, Donna Mathieu (joined at 5:14pm)

Absent: Azinaida Pedro

Employees: Sarah Cash, Travis Heynen, Hollie Sprague, Chris Kilmurry, Krissie Bodkin-Rubino

Guest: Laura Gormley (joined at 5:22pm)

II. Approval of the August 27, 2024 meeting minutes

Hussey motioned first to approve the minutes. Gagnon seconded. All in favor.

III. Financial Update

Kilmurry gave a brief update and stated that the finance department was in a good place for audits. He stated that Laura Gormley would provide more information in Executive Session.

IV. Consent Agenda: Operational & Director Reports

Sprague gave a brief overview of the delinquency report.

Hussey motioned first to approve the consent agenda. Gagnon seconded. All in favor.

V. New Business

a. Application for Center Credit Cards

Heynen provided a brief overview of the organization's plan to switch the credit card processing platform to Center. Hussey motioned first to approve proceeding with the Center Credit Card application. Gagnon seconded. All in favor.

b. Board Resolution: Operating Budget

Hussey motioned first to approve the resolution stating that the Board of Commissioners hereby approves the Lewiston Housing Authority's 2025 operating budget as presented, and authorizes the Executive Director to submit the HUD-52574 form to HUD in compliance with all applicable regulations. Gagnon seconded. All in favor.

c. Board Resolution: FY 2023 Choice Neighborhoods Supplemental Grant award

Hussey motioned first to approve the resolution stating that that the Executive Director is hereby authorized and directed to execute the Grant Agreement and HUD-1044 Form to implement the FY 2023 Choice Neighborhoods Supplemental Grant award. Gagnon seconded. All in favor.

VI. Open Forum

A discussion ensued regarding the date for the upcoming Board Annual Meeting. October 16, 2024 was chosen as the date for the meeting. Cash agreed to reach out to Fish Bones Bar & Grille to solidify the date the following day.

VII. Executive Session: Discussion or consideration of the condition, acquisition, or the use of real property or personal property permanently attached to real property: IMRSA 405(6)(c) & Discussion or consideration of the employment, appointment, assignment, duties, promotion, demotion, compensation, evaluation, disciplining, resignation or dismissal of an individual or group of public officials, appointees or employees of the body or agency or the investigation or hearing of charges or complaints against a person or persons: IMRSA 405 (6)(a)

Hussey motioned first to move into Executive Session at 5:25pm. Gagnon seconded. All in favor.

Hussey motioned first to exit Executive Session at 6:16pm. Gagnon seconded. All in favor.

VIII. Adjournment

Hussey motioned first to adjourn at 6:17pm. Mathieu seconded. All in favor.

*LEWISTON HOUSING
BOARD OF COMMISSIONERS
TELECONFERENCE SPECIAL MEETING
MONDAY, OCTOBER 7, 2024, AT 3:00 PM – VIA MS TEAMS
Meeting Minutes*

I. Roll Call – Meeting called to order at 3:12pm

Marc Pellerin, Jon Hussey, Guy Gagnon, Hassan Bouh, Azinaida Pedro (joined at 3:24pm),
Muhidin Libah (joined at 3:33pm)

Absent: Donna Mathieu (Excused)

Employees: Sarah Cash, Travis Heynen, Hollie Sprague, Chris Kilmurry

II. New Business

a. Public Housing property relocation discussion

Hussey motioned first at 3:12pm to move the discussion to Executive Session pursuant to
IMRSA 405(6)(c). Gagnon seconded. All in favor.

Hussey motioned first at 4:09pm to exit Executive Session. Gagnon seconded. All in favor.

III. Adjournment

Gagnon motioned first to adjourn at 4:09pm. Hussey seconded. All in favor.

*LEWISTON HOUSING
BOARD OF COMMISSIONERS
ANNUAL MEETING
WEDNESDAY, October 16, 2024 AT 5:30 PM- Fish Bones Grille
Meeting Minutes*

I. Roll Call – Meeting called to order at 5:30pm

Marc Pellerin, Guy Gagnon, Donna Mathieu, Hassan Bouh, Jon Hussey, Muhidin Libah

Absent: Azinaida Pedro

Employees: Chris Kilmurry, Penn Lindsay, Hollie Sprague

II. Approval of Board Officers

Secretary:

Hussey motioned first to approve Chris Kilmurry as Secretary. Gagnon seconded. All in favor.

Chair:

Hussey motioned first to approve Marc Pellerin as Board Chair. Bouh seconded. All in favor.

Vice-Chair:

Pellerin motioned first to approve Jon Hussey as Board Vice-Chair. Mathieu seconded. All in favor.

III. Adjournment

Hussey motioned to adjourn at 5:34pm. Gagnon seconded. All in favor.

Executive Director Update October 2024

While we have been working towards our collective goals and driving towards significant change for years, October of 2024 will likely go down in LHA's history as a pivotal date, as we are moving in our first residents into a new construction property. It has taken so much hard work and determination to get to this point, and now that we are moving in our first resident, with a significant pipeline of work to come, it almost feels as though we are arriving at the first peak of a rollercoaster. While I am extremely excited for the fast ride down the other side, I am also well aware that there are many more peaks and valleys to come. That said, momentum is a powerful force, so if we keep our eyes on the prize and stay focused on quality work and positive outcomes, our road ahead will be far smoother and easier to navigate.

CHOICE:

- 1.) **Wedgewood:** We obtained the Certificate of Occupancy for the first building and will start moving in the first wave of residents before the end of the month. Construction continues to move along efficiently, and there have been no significant delays to date. We anticipate 8 move-ins a month for the next 9 to 10 months.
- 2.) **DeWitt:** The 4% application has been approved. Construction will begin in early 2025. We anticipate our notice to proceed any day now.
- 3.) **New Market Tax Credits:** We are moving quickly on establishing the NMTC's modeling and deal structure and hope to have it funded around the start of the new year. The deal will focus solely on the expansion of the BStreet Health Center and DeWitt Commercial.
- 4.) **B Street Expansion:** We are completing the construction documents and plan to send them out for bidding in 6 to 8 weeks.

Property Acquisitions:

- **St Mary's:** We will discuss the status of the Maison Marcotte transfer in Executive Session due to the sensitive nature of RE transactions.

Development:

Martel School: The development team is finalizing plans and working with MSHA to bring the deal to a construction loan closing in the Spring.

Rural Housing: The Development team is exploring options to take advantage of MSHA's Rural Development Program. We will discuss this further in Executive Session as there are RE transaction and partnership considerations to discuss.

LIHTC: We anticipate word of our three LIHTC applications in late November or early December.

Public Housing Portfolio Redevelopment: We will discuss this project in Executive Session, as our options require discussing potential real estate acquisitions and partnerships.

**Deputy Executive Director Report
Submitted by Travis Heynen
October 2024**

Moving to Work (MTW) – Direct Rental Assistance (DRA):

Our DRA draft has officially entered the public comment period. HUD attorneys have completed a review, providing feedback and recommending a few minor changes, which will be incorporated. Public comment ends on November 14 and will go to the board of commissioners for review and vote shortly after. Additionally, we continue our collaboration with Bates College on the research component of the pilot, which promises valuable insights.

Yardi Update:

We are in the early stages of implementing the Customer Relationship Management (CRM) module, which we will gain efficiency in collecting work orders and enhancing resident interactions. Resident portals for our affordable properties are nearing completion, and we anticipate their full functionality soon. We're also preparing to launch the Job Costs module, which will be integral for the financial management of large grants, development initiatives, and construction projects.

Choice:

We submitted our required data to HUD this quarter and completed Budget Revision 6. This revision aligns the administrative and people budgets with Lewiston Housing's annual budget.

Center Credit Cards:

We have successfully rolled out our new credit card platform, and all team members are now live on the system. We are currently working on a Yardi import file that will allow us to import transactions directly into Yardi. This integration is expected to eliminate hours of manual data entry each month, streamlining our financial processes and improving efficiency.

Employee Updates:

Hires:

None

Departures:

Patrice Audain-Dixon, APM, 9/26/24

Open Positions:

- 2 Maintenance Tech positions
- 1 Senior Property Manager Position
- 1 Assistant Property Manager Position
- 1 Property Manager Position
- 1 Staff Accountant Position
- 1 FSS Coordinator Position
- 1 Choice Education Liaison Position

October 2024 Property Management and Rental Assistance Report
Submitted by Hollie Sprague October 25, 2024

Property Management:

Occupancy:

Owned: 98%

Managed: 93%

Make Ready Stats:

Owned and managed: Average will be provided in November's board packet

Managed: Average will be provided in November's board packet

Delinquencies: Updated reports will be provided in November's board packet

Bates Senior Housing: Providers from MAS Community Health present information regarding their agency along with hosting a harvest party celebration and will also have a Bates College volunteer offer technical assistance to residents at the end of the month.

Seniors Plus toured the kitchen and community space to assess the ability to offer programs in the future.

Gauvreau Place: The Lewiston Community Officers hosted a meeting regarding safety tips after recent violence events. Provided information on Holiday assistance along with hosting a harvest party celebration.

Hillview: EMLI, Early Math and Family Initiative began and will commence for 16 weeks once a week with a great turnout of 10 families (35 participants).

Regina Schulman from the Maine Resiliency Center returned to offer continued support to the families after the tragic event, the Girls Scouts returned for the year and staff are working with Literacy Volunteers to host English conversation classes for the workplace.

Meadowview: Bates College volunteers provided a brunch for the residents and staff are working with more Bates College volunteers to offer technical assistance to the residents

Lafayette Park/Scattered Sites:

LP Fall Event – Community Police attended and met with residents to discuss their concerns regarding criminal activity downtown.

Wedgewood

2 LP residents moving to WW in the next 2 weeks

9 residents have received their 90-day notices

ROSS – HV & MV – Ross coordinator has been working with the volunteer Resident Leaders to share information regarding programming and discuss pathways to clearer communication with LHA Staff as this has been expressed as a significant pain point. Increased office hours at both sites.

Met with the 4-H Director at Hillview to discuss upcoming changes including the hiring of a new 4-H Program Administrator who will host programming at Hillview hopefully beginning early 2025. I have also met with Hannah Conkin from MEIRS who is working to establish a teen after-school theater program which will culminate in a performance at the end of this year. Finally, we have kicked off the EMLI program which had fantastic attendance according to Jay, with about 35 people showing up for the first couple of sessions. I continue to market ROSS and am hosting an event on October 23rd 12:00- 4:00 to assist with Holiday Applications and ROSS Sign Ups along with Roux.

Maple Knoll

Community police department attended Fall gathering. Many follow ups with residents answering questions about the increase in criminal activity in the downtown area.

Rental Assistance:

Staffing:

The Rental Assistance Dept is currently working fully in Yardi, learning the ins and outs of Rent Café in order to start doing annual recertifications and interims through Yardi. The team is gearing up to send the first letters out to tenants about the tenant portals and how to set them up. The team is finding the HOTMA changes helpful with their workloads.

Housing Navigator:

Datsy has a total of 45 people she is currently working with either filling out applications, lining up apartment showings, as well as finding supplies that they may need. Datsy also provides follow up/stabilization services to 51 households. She has successfully housed 51 clients and has 1 pending placement.

Success: Young man who was living in a tent, was housed with an HCV and is now working and has his apartment furnished.

Success: 69 yr old male who never had an apartment, said he has lived in his car or rented rooms here and there his entire life. Placed in an apartment full of furniture. He is now is able to get treatment for his health issues.

Housing Choice Vouchers:

There are currently 1196 applications on the HCV waiting list, along with 22 vouchers issued and 1 port in. There are currently zero families waiting for initial inspections.

Issued:

1 bedroom =14
2 bedrooms = 2
3 bedrooms =5
4 bedrooms = 1

Landlord incentive totals:

The landlord incentive program continues to be utilized strongly in the community. Totals so far:

Security deposit: \$246,693.00
Landlord incentives: \$374,250.00
Landlord incentives MSV: \$10,000.00
Damage Reimbursement: \$48,141.29
Vacancy Claims \$7691.00

Housing Assistance Payments Program

Housing Choice Voucher and Mod Rehab Contract Status for October 2024

	Grand Total	SRO	1 BR	2BR	3 BR	4 BR	5+ BR
Total Authorized Vouchers	1468						
Tenant Based Vouchers	1267						
Project Based Vouchers	70						
Mainstream Vouchers	139						
Emergency Housing Vouchers	14						
Foster Youth Vouchers	2						
Total Active Vouchers	1163						
Total Active Tenant Based Vouchers	951						
Tenant Based Vouchers Temporarily Inactive	55						
Total Active Project Based Vouchers	66						
Total Active Mainstream Vouchers	137						
Total Active Emergency Housing Vouchers	12						
Mod Rehab Contracts Authorized	114						
Contract in Effect	101						
Total Active MainStream Vouchers Ported Out	9						
Portable Tenant Vouchers Ported In	0						
Portable Tenant Vouchers Ported Out	31						

Authorized Emergency Housing Vouchers (EHV)	14						
EHV Vouchers Issued	0						
FYI Vouchers Issued	0						
Tenant Based Vouchers Issued	22						

LEWISTON HOUSING AUTHORITY INSPECTION REPORT October 2024	PRE-OCCUPANCY	ANNUAL	SPECIAL	RE-INSPECTIONS	
<u>SECTION 8 EXSISTING</u>	11	50	0	47	
TOTALS	11	50	0	47	108
<u>MOD. REHAB</u>					
162, 164 BARTLETT STREET					
ST. MARY'S	2				
TOTALS	2				
SUB TOTALS	13	50	0	47	110
	TOTAL OF ALL INSPECTIONS				110

Affordable Unit Vacancy 9/21/24-10/21/24

			Move Out			Current	
Property	Unit	W/O Start	Date	Turn date	Turn days	Days Vacant	vacanacy notes
blwa	5-2	8/20/2024	8/19/2024	9/7/2024	18	62.0	Move-in 11/21
blwa	7-2	4/23/24	4/22/2024	4/25/2024	3	181.0	Move in 11/21
gvp	300-M	7/19/24	7/18/2024	8/8/2024	20	94.0	Processing 20 Applicants; once verified some will be sent into compliance for income ineligibility
gvp	210	9/17/24	9/16/2024	10/1/2024	14	34.0	Processing 14 Applicants; once verified some will be sent into compliance for income ineligibility
oxfam	16-SP-1	2/10/24	2/9/2024	2/24/2024	15	254.0	Processing One Applicant, close to being sent to compliance
oxfam	399-2	3/3/24	3/2/2024	3/15/2024	13	232.0	Searching for Applicants and processing when found, this unit is uniquely difficult to market due to the 40% set aside,
oxfam	NOR-2	8/7/24	8/6/2024	8/9/2024	3	75.0	One Applicant To Be In Compliance By 10/18/24
oxfam	NOR- 7	8/24/24	8/23/2024	9/30/2024	37	25.0	10/1/24 move in
oxfam	NOR-11	9/11/2024	9/10/2024	Pending	Pending	40.0	Processing Applicants 1really close for pre lease Unit Not Ready Processing 10 Applicants
sbh	01	5/2/24	5/1/2024	5/30/2024	29	172.0	Approved Applicant; MI 11/05/2024
suph	408-1	2/14/24	2/13/2024	5/9/2024	86	250.0	Approved Applicant; MI 11/07/2024
MBH	2	9/10/2024	9/9/2024	10/21/2024	41	41.0	Transfer from #5
oxfam	24-FR-12	8/30/2024	8/29/2024	10/3/2024	34	52.0	Prcessing Applicants 5 one interview 10/3/24

BSH	208	10/2/2024	10/1/2024	10/21/2024	19	19.0	Several applicants processing, one close Processing 9
MSH	92	9/16/2024	9/15/2024	pending	pending	35.0	Processing 10 Applicants, One is very close to completion, once verified some will be sent into

Owned Unit Status Review

Unit Status	W/O Start	Move out date	Turn date	Turn days	Days Vacan	Vacancy notes
BST 3-H	9/4/2024	9/3/2024	9/12/2024	8.0	48.0	Processing 3 applicants
BST - 3-K	7/16/2024	7/15/2024	7/22/2024	7.0	98.0	Applicant awating approval and move in
BST - 3-R	8/23/2024	8/22/2024	8/30/2024	7.0	60.0	Applicant awaitng approval and move in
BST 5-G	9/4/2024	9/3/2024	Pending	Pending	48.0	Held Open house 20 applicants processing
HVA 11-5	9/11/2024	9/10/2024	Pending	Pending	41.0	2-2 LP relocation transfer M/I 11/15
HVA 13-4	10/5/2024	10/4/2024	Pending	Pending	17.0	3-3 LP relocation transfer 11/15
HVA 13-6	9/11/2024	9/10/2024	10/8/2024	27	41.0	scheduling transfer of 2-4 LP relocation M/I: 10/28
HVA 14-5	9/21/2024	9/20/2024	Pending	Pending	31.0	Approved applicant M/I 11/15
MVA 371	9/17/2024	9/16/2024	9/20/2024	4	35.0	Holding to temporary transfer
MK #2	7/23/2024	7/22/2024	8/7/2024	15.0	91.0	2 pending applications

Policy on Conflicts of Interest and Disclosure of Certain Interests - DRAFT

This conflict of interest policy is designed to help commissioners, directors, officers, and employees of Lewiston Housing identify situations that present potential conflicts of interest and to provide Lewiston Housing with procedures that, if observed, will allow a transaction to be treated as valid and binding even though a director, officer, or employee has or may have a conflict of interest with respect to the transaction. In the event there is an inconsistency between the requirements and procedures prescribed herein and those in federal or state law, the law shall control.

1. **Conflict of Interest Defined.** For purposes of this policy, the following circumstances shall be deemed to create Conflicts of Interest:
 - a. Outside Interests.
 - i. A Contract or Transaction between Lewiston Housing and a Responsible Person or Family Member.
 - ii. A Contract or Transaction between Lewiston Housing and an entity in which a Responsible Person or Family Member has a Material Financial Interest or of which such person is a director, officer, agent, partner, associate, trustee, personal representative, receiver, guardian, custodian, conservator, or other legal representative.
 - b. Outside Activities.
 - i. A Responsible Person competing with Lewiston Housing in the rendering of services or in any other Contract or Transaction with a third party.
 - ii. A Responsible Person's having a Material Financial Interest in or serving as a director, officer, employee, agent, partner, associate, trustee, personal representative receiver, guardian, custodian, conservator, or other legal representative of, or consultant to; an entity or individual that competes with Lewiston Housing in the provision of services or any other Contract or Transaction with a third party.
 - c. Gifts, Gratuities, and Entertainment. A Responsible Person accepting gifts, entertainment, or other favors from any individual or entity that:
 - i. does or is seeking business with, or is a competitor of Lewiston Housing; or
 - ii. has received, is receiving, or is seeking to receive a loan or grant or to secure other financial commitments from Lewiston Housing;
 - iii. is a charitable organization;under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value that are not related to any particular transaction or activity of Lewiston Housing.

2. Definitions.

- a. *Conflict of Interest* is any circumstance described in Part 1 of this Policy.

- b. *Responsible Person* is any person serving as an officer, employee, or member of the board of commissioners of Lewiston Housing.
- c. *Family Member* is a spouse, domestic partner, parent, child, or spouse of a child, sibling, or spouse of a sibling of a Responsible Person, including extended relations such as uncle, aunt, first cousin, nephew, niece, in-laws, and step-relations.
- d. *Material Financial Interest* in an entity is a financial interest of any kind that, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect a Responsible Person's or Family Member's judgment with respect to transactions to which the entity is a party. This includes all forms of compensation.
- e. *Contract or Transaction* is any agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a loan or grant, the establishment of any other type of pecuniary relationship or review of a charitable organization by Lewiston Housing. The making of a gift to Lewiston Housing is not a Contract or Transaction.

3. Procedures.

- a. Before board or committee action on a Contract or Transaction involving a Conflict of Interest, a director or committee member having a Conflict of Interest and attending the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the meeting minutes.
- b. A director or committee member who plans not to attend a meeting at which he or she has reason to believe that the board or committee will act on a matter in which the person has a Conflict of Interest shall disclose to the chair of the meeting all facts material to the Conflict of Interest. The chair shall report the disclosure at the meeting, which shall be reflected in the meeting minutes.
- c. A person who has a Conflict of Interest shall not participate in or be permitted to hear the board's or committee's discussion of the matter except to disclose material facts and respond to questions. Such a person shall not attempt to exert his or her personal influence with respect to the matter, either at or outside the meeting.
- d. A person who has a Conflict of Interest with respect to a Contract or Transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote. The person having a conflict of interest may not vote on the Contract or Transaction and shall not be present in the meeting room when the vote is taken unless the vote is by secret ballot. Such person's ineligibility to vote shall be reflected in the minutes of the meeting. For purposes of this paragraph, a member of the Board of Commissioners of Lewiston Housing has a Conflict of Interest when they stand for election as an officer or for re-election as a member of the Board of Commissioners.
- e. Responsible Persons who are not members of the board of commissioners of Lewiston Housing or who have a Conflict of Interest with respect to a Contract or Transaction that is not the subject of board or committee action shall disclose to the Executive Director or the Executive Director's designee any Conflict of Interest that such Responsible Person has with respect to a Contract or Transaction. Such disclosure shall be made as soon as the Conflict of Interest is known to the Responsible Person. The Responsible Person shall refrain from any action that may affect Lewiston Housing's participation in such Contract or Transaction.

In the event it is not entirely clear that a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to the Executive Director or the Executive Director's designee, who shall determine whether there exists a Conflict of Interest that is subject to this policy.

4. **Post-Tenure Restrictions.** As provided in 30-A M.R.S. § 4724(2), during tenure and within one year of service, no employee or commissioner of Lewiston Housing may voluntarily acquire any interest, direct or indirect, in any contract, project, or property included or planned to be included in any project of Lewiston Housing over which the employee or commissioner has exercised responsibility, control, or decisions during tenure with Lewiston Housing. Furthermore, no employee or commissioner of Lewiston Housing, if employment is accepted with any person who has an interest in any contract, property, or project included or planned to be included in any project of Lewiston Housing, may work directly on that contract, project, or property for that person if the employee or commissioner has exercised responsibility, control, or decisions over that contract, project, or property.
5. **Confidentiality.** Each Responsible Person shall exercise care not to disclose confidential information acquired in connection with such status or information, the disclosure of which might be adverse to the interests of Lewiston Housing. Furthermore, a Responsible Person shall not disclose or use information relating to the business of Lewiston Housing for the personal profit or advantage of the Responsible Person or a Family Member.
6. **Review of Policy.**
 - a. Each new Responsible Person shall be required to review a copy of this policy and to acknowledge in writing that they have done so.
 - b. Each new Responsible Person shall annually complete a disclosure form identifying any relationships, positions, or circumstances in which the Responsible Person is involved that he or she believes could contribute to a Conflict of Interest arising. Such relationships, positions, or circumstances might include service as a director of or consultant to a not-for-profit organization or ownership of a business that might provide goods or services to Lewiston Housing. Any such information regarding the business interests of a Responsible Person or a Family Member shall be treated as confidential and shall generally be made available only to the Chair, the Executive Director, and any committee appointed to address Conflicts of Interests, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.
 - c. This policy shall be reviewed annually by each member of the board of commissioners. Any changes to the policy shall be communicated immediately to all Responsible Persons.

Name: _____ Date: _____

Please describe below any relationships, positions, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest (as defined in Lewiston Housing's Policy on Conflicts of Interest) arising.

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of Lewiston Housing that is currently in effect.

Signature: _____ Date: _____

DRAFT

Whistleblowers' Protection Policy – Draft

Board Approved:

LHA strictly prohibits and does not tolerate unlawful retaliation against any employee. All forms of unlawful retaliation are prohibited. Forms of retaliation may include termination, threats, or discipline, other forms of reprisal, intimidation, or discrimination against an employee due to that person's participation in activities protected by law and including whistleblowing or taking legally protected leave time. We believe that employees should feel free to raise concerns that they may have or problems they see in the workplace. To report an unsafe condition or practice or an inappropriate or illegal act in the workplace, employees should notify their supervisor. Making such a report will not be held against employees in any way. In fact, it is illegal for the Authority to fire, threaten or treat an employee differently because an employee in good faith:

- Reports to LHA or a public body what the employee reasonably believes is a violation of a law or regulation, if first brought to the attention of a supervisor to allow LHA to redress the issue;
- Reports to LHA or a public body what the employee reasonably believes is a condition or practice that would put at risk the health or safety of that employee or any other individual;
- Participates in or is asked to participate in, an investigation, hearing or inquiry held by a public body, or in a court action;
- Supports another employee's internal or administrative complaint of unlawful discrimination (by, for example, testifying or providing an affidavit in support of a co-worker who has filed a discrimination complaint with the EEOC or the Maine Human Rights Commission, or other local body);
- Refuses to carry out a directive to engage in activity that would be a violation of a law or regulation, or that would expose the employee or any individual to a condition that would result in serious injury or death, after having sought and been unable to obtain a correction of the illegal activity or dangerous condition from LHA;
- Requests an accommodation under the Americans with Disabilities Act or Maine nondiscrimination statutes; or
- Requests or takes leave under the Family and Medical Leave Act.

Employees are always encouraged to bring such concerns to the attention of LHA. Any employee that believes they have been the target of retaliation should report that to LHA.

(207) 783-1423 | PO Box 361, Lewiston, Maine 04243 | www.lewistonhousing.org