Derek Haines
Executive Director
Lexington Housing Authority
609 East Third Street
Lexington NE 68850-2216

U.S. Department of Housing and Urban Development

Omaha Field Office Edward Zorinsky Federal Building Suite 329 1616 Capitol Avenue Omaha, Nebraska 68102-4908

March 22, 2018

SUBJECT: Lexington Housing Authority NE010

Audit Review for Fiscal Year Ended June 30, 2017

This letter is in response to the February 20, 2018, the Real Estate Assessment Center's (REAC) Financial Assessment Subsystem (FASS) received Lexington Housing Authority's (Authority) audited financial data submission for the June 30, 2017 fiscal year end (FYE). The audit was conducted by Niewedde and Wiens, Certified Public Accountants. The auditor issued three findings. To ensure the appropriate corrective actions are implemented, findings 2017-1, 2017-2 and 2017-3 are sustained.

I assumed control for the Lexington Housing Authority officially in October of 2017. The items uncovered in the audit have occurred prior to my employment at LHA. Now that I am aware of these items, I can assure the proper steps will be taken to obtain compliance.

Prior year audit finding 2016-1 is repeated this year as finding 2017-1.

Finding 2017-1 Selection and Application of Accounting Principles

The Authority is solely responsible for selection and application of accounting principles; however, the Authority does rely on its fee accountant to assist with proper application of accounting principles. The auditor noted the following instances where generally accepted accounting principles were not followed:

- The Authority miscoded a HAP advance in the Housing Choice Voucher program as an administrative advance that was not properly reconciled to the disbursement schedule provided by HUD.
- The Authority recorded the administrative fee earned in the Housing Choice Voucher program on the cash basis of accounting instead of the accrual basis as required by generally accepted accounting principles.

- The unaudited financial data schedule submitted for the year ended June 30, 2017 was misstated as the Authority reported restricted cash of \$29,893 for excess housing assistance payments as unrestricted and did properly report restricted net position of \$29,893.
- The interfund balance on the unaudited financial data schedule did not balance and were not eliminated as required.
- The Authority has a \$100,000 guarantee related to a tax-credit project which should have been reported as a restricted investment in the Section 8 New Construction program but was incorrectly reported as an unrestricted investment.
- The Authority improperly accrued \$8,121 of July 2017 operating subsidy as revenue at June 30, 2017.
- The Authority recorded depreciation costs on architect fees for which the related project had not started yet as of June 30, 2017.
- The Authority had received insurance proceeds in the Public Housing program of \$35,398 .94 which were unspent as of June 30, 2017. These funds should have been reported as restricted net position on the unaudited financial data schedule but were not.
- The Authority had additional insurance proceeds of \$7,224.45 in the Section 8 New Construction program that should have been accrued. The Authority failed to accrue additional insurance proceeds of \$26,127 .59 related to storm damage it the Public Housing program. This is a continuation of a prior yearissue.
- The investment in the tax-credit project is not being analyzed and adjusted on an annual basis.
- The interest on the two notes receivable was neither accrued or compounded during the year as the balances did not change during the year.
- The payroll accrual as of June 30, 2017 was missing numerous salaries and adjustments needed to be recorded to correct the accrual. Further, some salaries were incorrectly recorded as accounts payable.
- The journal vouchers used to record transactions should be adequately supported. The
 journal vouchers to record accounts payable only had a summary by total and account
 coding and did not indicate the underlying transaction. Once requested from the fee
 accountant, the support did not reconcile to journal entry and there were various coding
 errors.
- The Authority's system for allocating employee benefits is not equitable between programs with the Section 8 New Construction and Voucher programs incurring a much

higher percentage than the Public Housing program. Had the benefit expenses been equitably distributed, the Public Housing program would have had approximately \$16,000 more employee benefit expense while the Section 8 New Construction program and the Housing Choice Voucher program having \$8,000 and \$6,000 less, respectively.

• The Authority does a budget for each program but not all programs include it with the monthly financial reports. We further noted such things as benefit costs are not allocated between administrative and maintenance expenses. As some budgets are not reported with the monthly financial reports and the budget does not always follow the actual accounts used, it makes it difficult for staff and the Board of Commissioners to accurately oversee the financials and to do an accurate budget to actual analysis. As a result, Public Housing was overbudget by \$30,298 based on the unaudited figures. We further noted the Section 8 New Construction budget was not reasonable compared to the program's history and was overbudget by \$119,010.

Corrective Action Required

The accounting and reporting errors have been an ongoing issue for the Authority and these are all items that had a proper review been done would have been caught. Based on that, the Authority should review the issues with its current fee accountant and evaluate its accounting options.

The Lexington Housing Authority has once again reviewed these issues with our CNABER our fee accountant. The director has contacted the owner of the firm directly and asked for the corrections to be made.

At FYE June 2018 the Lexington Housing is going to switch fee accountants as noted in attached audit findings per Board Meeting minutes on 2-21-2018.

For the employee benefit allocation issue, the Authority should review its system to ensure each program gets an equitable share. Please provide a copy of the Authority's Cost Allocation Plan.

The Lexington Housing Authority has developed a spreadsheet and computergenerated timesheets to more accurately track the hours worked per project. It has been stressed to the employees the importance of accurately tracking hours. This issue will also be addressed again when the switch in accountants occurs to insure correct reporting. Attached please find the payroll reporting for the pay period ending March 21, 2018 showing the tracking methodology.

For the budget issue, the auditor reviewed a budget system with the Executive Director where the budget would be developed in a similar format to the Authority's financial statements as reported in accordance with generally accepted accounting principles. The budget would have a column for each program the Authority maintains with a total, so the Board of Commissioners can not only approve a budget for each program, but the Authority as a whole. The budget should be based on historical items and currently known facts. The budget should be included with the monthly financial records, so the Board can compare and make adequate financial decisions. Please provide a copy of the budget as well as the most recent Board minutes indicating that a Budget versus Actual Expenses was provided to the Board for review.

Attached are the copies of the budgets that were prepared for the year 2017 - 2018. I have also taken the liberty to put them in spreadsheet format and attached that for your review. The Director, with assistance of the new fee accountant will prepare individual program budgets and an entity wide budget for 2018 - 2019.

The current fee accountant states they have lost some staff and are behind. Despite numerous attempts to get updated budget progress reports they were not available for the most recent Board meeting. Attached please find the minutes where the budget progress reports were last reported to the Board.

Finding 2017-2: Related Party Transactions/Inventory Control

The Authority's Board of Commissioners approved the purchase of a trailer for \$600 from the Authority's maintenance supervisor which was also the Executive Director's husband. The Executive Director subsequently retired from the Authority.

It was further brought to auditor's attention by an Authority employee that the Executive Director was authorizing the purchase of carpeting for the Authority but then the Executive Director was purchasing the carpeting from the Authority. There were no controls in place to ensure the Authority was properly reimbursed for the amount sold to the Executive Director. The Authority is sales tax exempt so unless the Executive Director reported the purchase on her tax return, sales tax would have been avoided.

The Authority's Board of Commissioners and Executive Director should familiarize itself with State law regarding related party transactions. Further, although not applicable to the situation above, the Authority should familiarize itself with its Annual Contributions Contract with HUD as it has similar requirements. The Authority should establish a policy of where only items needed for current Authority needs are purchased and an adequate inventory internal control be established. The Authority should review its ethics and anti-fraud policies and update as necessary so that staff feel comfortable approaching a Board member with their concerns without fear of repercussions.

Corrective Action Required

We acknowledge your response to the auditor; however, we are unable to close the finding solely based on it. Please provide a copy of the Authority's inventory control policy and ethics and anti-fraud policy. The Board should ensure the current policies address the concerns in the finding.

The Lexington Housing Authority is currently working on developing an internal tracking method for inventory control system. LHA intends to have the inventory control system in place by FYE 2018.

The Lexington Housing Authority has reviewed the attached Ethics and Anti-Fraud policy with the Board of Commissioners and all employees. Employees have been encouraged to report any suspected fraud to the director or if needed to a member of the board without the fear of repercussions as were felt with the prior director. Also reviewed were the state statutes covering items related to this issue. The Lexington Housing Authority will not purchase items from Commissioners, Directors, or employees or allow the same to purchase and later reimburse the Lexington Housing Authority going forward.

Finding 2017-3: Finding 2017-003: Housing Choice Voucher Reporting

During our audit, the auditor noted the unaudited Financial Data Schedule transmitted to the Real Estate Assessment Center did not properly report restricted cash of \$29,893 on line 113 or related restricted net position of \$29,893 on line 511.4. The Authority reported both as unrestricted cash and unrestricted net position. The Authority did report the Housing Assistance Payments Equity (restricted net position) on line 11180. Line 511.4 and line 11180 should reconcile. The Authority relies on its fee accountant to properly report these items without controls overseeing the process.

Corrective Action Required

We acknowledge your response to the auditor; however, we are unable to close the finding solely based on it. Please review this finding with the Board and document in writing the specific steps the Authority is taking to ensure it has effectively reviewed that the restricted cash and restricted net position is reported correctly.

The Director has addressed this issue with the fee accountant. In response to the continual errors the Lexington Housing Authority will be switching fee accountants beginning FYE 2018. The items noted here occurred prior to my employment and appears they were not reviewed by the prior director. As a newer director I will gain further knowledge of the accounting process and will review the accounting on a routine basis.

Please respond to the requested information by April 12, 2018, to the following address or via e-mail at <u>ie anne.m.coats@hud.gov</u>:

U.S. Department of Housing and Urban Development Denise Gipson, Director Office of Public Housing 1616 Capitol Avenue, Suite 329 Omaha, NE 68102-4908

Upon receipt, we will review your response and make further decisions or recommendations as appropriate. If you disagree with the requested corrective action and/or time frame, please respond with an explanation and documentation in support of your position. Please note that findings cannot be appealed through this process. Should you have any questions or concerns please contact Jeanne Coats, Financial Analyst at (402) 492-3156.

Sincerely,

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Director Office of Public Housing

cc:

Victoria Clements, Board Chair William Brecks, Board Member Vance Bricker, Board Member John Salem, Board Member Dorothy Woodside, Board Member

Lexington Housing Authority Minutes 2-21-2018

The regular and annual meeting of the Lexington Housing Authority was held Wednesday, February 21, 2018, at 609 East 3rd Street, Lexington, Nebraska, at 5:10 p.m. Commissioners present were Vice – Chair John Salem, Bill Brecks and Dorothy Woodside along with Director Derek Haines. Chairman Victoria Clements and Commissioner Vance Bricker were absent.

NOTICE: Notice of the meeting was given in advance, thereof by posting the notice in the Lexington Clipper Herald on 2-10-2018 and posting a notice in the LHA lobby, the designated method for giving notice. The proceedings hereafter shown were taken while the convened meeting was open to the attendance of the public. All items presented and discussed on the Agenda were available for public inspection.

CALL TO ORDER: The annual meeting was called to order by Vice Chairman Salem at 5:10 PM who informed the public that the Open Meetings Act is posted at the Lexington Housing Authority, located at 609 E 3rd Street, Lexington, Nebraska.

The items discussed were the Five Year Action Plan and capital fund budget. Commissioner Brecks moved to approve the Five Year Action Plan and capital fund budget with a second by Commissioner Woodside. After no further discussion, Vice Chairman Salem called for the vote: Ayes: Salem, Brecks, Woodside. Nays: None. Motion Carried

This meeting was closed and the regular meeting of the Lexington Housing Authority was opened at 5:30 PM.

The regular meeting was called to order by Vice Chairman Salem at 5:30 PM who informed the public that the Open Meetings Act is posted at the Lexington Housing Authority, located at 609 E 3rd Street, Lexington, Nebraska.

Agenda: The agenda was approved as presented. Motion to approve the agenda made by Commissioner Brecks and second by Commissioner Woodside. After no further discussion, Vice Chairman Salem called for the vote: Ayes: Salem, Brecks, Woodside. Nays: None. Motion Carried

Consent Agenda Items:

Minutes of the Regular Meeting held January 17, 2017, were presented to the Commissioners for consideration and approval.

Claims and Bills including the check registers were presented to the Commissioners for consideration and approval.

Financial Reports including budget progress reports, expenses owed, and capital grant funding were presented to the Commissioners for consideration and approval.

A motion to approve the consent agenda items as presented was made by Commissioner Woodside, second by Commissioner Brecks. After no further discussion, Vice Chairman Salem called for the vote: Ayes: Salem, Brecks, Woodside. Nays: None. Motion Carried

Public Comment Period

There were no parties in attendance for public comment period.

Unfinished Business

None

Occupancy Report: The Occupancy Report was presented to the Commissioners for review and discussion.

Directors Report:

Director Haines went over the written Directors report. Haines explained that he has received quotes for an improved internet service and the current firewall and switch would be unable to handle the upgrade. Intellicom Inc from Kearney has provided an acceptable solution to the issue and would also be able to provide a wireless internet connection to the shop. Intellicom has come highly recommended and with their availability to provide 24/7 tech support it was discussed to move forward with the purchase and installation of equipment in the amount of approximately \$8,500. This falls under the small purchase procedures in the procurement policy.

Review Draft Audit:

The Commissioners were given a draft copy of the audit which was reviewed at the meeting. The final audit arrived the day of the meeting and the Commissioners were each given a copy of the audit. The findings and the replies were discussed. The findings were addressed by Haines, however they occurred in the time prior to his employment at LHA. Finding 2017 - 001 There were reporting and accounting errors that were communicated to the fee accountant. It was noted that the current fee accountant is continuing to make the same errors each year without fixing them. Haines noted that he has received a quote from Loucks and Schwartz a different fee accountant as discussed at prior board meetings and plans to move the service here in June 2018. Haines is also streamline reporting and taking advantage of the computer software as opposed to handwritten reports that were previously submitted. Finding 2017 – 002 referenced the purchase of a trailer from the prior maintenance supervisor who was the prior executive directors husband in the amount of \$600. Haines noted that the practice of purchasing items from employees that could potentially be in violation of state law was ceased on 2-8-2018. Additionally, an inventory system is being developed in an effort to eliminate potential violations going forward.

In discussions it was brought to up that in addition to the sale of the trailer it was also mentioned by the auditor that the prior director had purchased some carpet through the housing authority. The prior director reimbursed the housing authority for the purchase but potentially avoided paying taxes on the purchase. There is potentially a heat pump / AC unit and furnace missing from our inventory. Haines will have the maintenance staff look through the storage building for the missing item. If any further discretions appear Haines will report them to the board.

Finding 2017-003 – The auditor noted accounting errors that continue to occur. Haines is looking to switch accountants at FYE.

Resolution 2018 – 04 Election of Officers

Director Haines introduced Resolution 2018 - 04

Nominations were called for the election of officers for the year February 2018 to February 2019. Chairman Clements and Vice Chairman Salem were nominated to remain in the current positions for the year. A motion to approve was made by Commissioner Brecks and seconded by Commissioner Woodside.

After no further discussion, Vice Chairman Salem called for the vote: Ayes: Salem, Brecks, Woodside. Nays: None. Motion Carried

DUTIES OF THE COMMISSIONERS

General duties of the Commissioners were reviewed. Topics of Ethics, Moral Behavior, staying Civically Active and Commissioner Training were discussed. The Director encouraged all Commissioners to attend Conferences and trainings including any Commissioners Training sessions they could get away for. No formal action was taken.

REVIEW EXISTING ETHICS POLICY

The Commissioners had their annual review and discussion on the Ethics Policy, Mission Statement, Statement of Values, Code of Conduct and Standards of Ethics and Conduct Pledge. Each Commissioner signed a document stating they had received a copy, read it and understood the policy. Lexington Housing Authority staff will be reviewing the policy at their Annual Staff Meeting on Tuesday February 27-2018.

COMPREHENSIVE ANTI-FRAUD POLICY

The Commissioner had their annual review and discussion on the Comprehensive Anti-Fraud Policy. Each Commissioner signed a document stating they had received a copy, read it and understood the policy.

Roundtable Discussion

It was brought up to move the meeting time to the third Wednesday of each month at 12:00 PM.

Next meeting: 3-21-18 at 12:00 PM
At 5:45 PM Vice Chairman Salem adjourned the meeting.

Respectfully Submitted
Derek Haines, Executive Director

Vice - Chairman

Executive Director

Lexington Housing Auth	ority		NAME:					
	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	TOTAL
	2/19/2018	2/20	2/21	2/22	2/23	2/24	2/25	
EastLawn 1-01								
Scattered Sites 1-02								
Eastlawn Add 2-01								
Pioneer Homes 3-01								
Storage 3-03								
Eastlawn East 4-01								
Legend Oaks 4-05								
Legend Oaks II 4-06								
Voucher 8-01								
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Holiday								
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	2/26/2018	2/27	2/28	3/1	3/2	3/3	3/4	
EastLawn 1-01								
Scattered Sites 1-02								
Eastlawn Add 2-01								
Pioneer Homes 3-01								
Storage 3-03								
Eastlawn East 4-01								
Legend Oaks 4-05								
Legend Oaks II 4-06								
Voucher 8-01								
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EastLawn 1-01								
Scattered Sites 1-02								
Eastlawn Add 2-01								
Pioneer Homes 3-01								
Storage 3-03								
Eastlawn East 4-01								
Legend Oaks 4-05								
Legend Oaks II 4-06								
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EastLawn 1-01								
Scattered Sites 1-02								
Eastlawn Add 2-01								
Pioneer Homes 3-01								
Storage 3-03								
Eastlawn East 4-01								
Legend Oaks 4-05								
Legend Oaks II 4-06								
Voucher 8-01								
TOTAL								
TOTAL								

	Mon	Tues	Wed	Thurs	Fri	Sat	Sun	TOTAL
	3/19/2018	3/20	3/21	3/22	3/23	3/24	3/25	
EastLawn 1-01								
Scattered Sites 1-02								
Eastlawn Add 2-01								
Pioneer Homes 3-01								
Storage 3-03								
Eastlawn East 4-01								
Legend Oaks 4-05								
Legend Oaks II 4-06								
Voucher 8-01								
TOTAL								

Reg				
PLT				
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Holiday				
Overtime				
TOTAL				

Signed			
Date			

Reg Hours	0.00
Old Sick Leave (Manual)	
Personal Lv	0.00
Extended Sick Leave	0.00
Holiday	0.00
TOTAL	0
Overtime	0.00
TOTAL	0

Reg Hrs Personal Lv	0.00
Extended Sick Lv	0.00
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TOTAL Hours	Monthly T	otal Hours
EastLawn 1-01	0.00	#DIV/0!
Scattered Sites 1-02	0.00	#DIV/0!
Eastlawn Add 2-01	0.00	#DIV/0!
Pioneer Homes 3-01	0.00	#DIV/0!
Storage 3-03	0.00	#DIV/0!
Eastlawn East 4-01	0.00	#DIV/0!
Legend Oaks 4-05	0.00	#DIV/0!
Legend Oaks II 4-06	0.00	#DIV/0!
Voucher 8-01	0.00	#DIV/0!
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Totals

Reg Hours	1748.24
Old Sick Leave (Manual)	0.00
Personal Lv	55.00
Extended Sick Leave	33.00
Holiday	59.00
TOTAL	1895.24
Overtime	29.50
TOTAL	1924.74

Reg Hrs	1748.24
· ·	
Personal Lv	55.00
Extended Sick Lv	33.00
Holiday	59.00
TOTAL	1895.24
ОТ	29.50
TOTAL	1924.74

TOTAL Hours Monthly Total Hours

EastLawn 1-01	691.75	35.94%
Scattered Sites 1-02	178.50	9.27%
Eastlawn Add 2-01	540.50	28.08%
Pioneer Homes 3-01	57.25	2.97%
Storage 3-03	1.00	0.05%
Eastlawn East 4-01	173.75	9.03%
Legend Oaks 4-05	70.25	3.65%
Legend Oaks II 4-06	55.25	2.87%
Voucher 8-01	156.49	8.13%
TOTAL	1924.74	100.00%

Verification 1924.74

Total Hours Office

TOTAL Hours	Monthly Total Hours	
EastLawn 1-01	383.75	33.33%
Scattered Sites 1-02	114.50	9.95%
Eastlawn Add 2-01	332.50	28.88%
Pioneer Homes 3-01	45.75	3.97%
Storage 3-03	0.00	0.00%
Eastlawn East 4-01	23.75	2.06%
Legend Oaks 4-05	51.75	4.50%

Total Cleaning - Donna

TOTAL Hours	Monthly Total Hours	
EastLawn 1-01	66.50	41.56%
Scattered Sites 1-02	24.50	15.31%
Eastlawn Add 2-01	8.00	5.00%
Pioneer Homes 3-01	0.00	0.00%
Storage 3-03	0.00	0.00%
Eastlawn East 4-01	61.00	38.13%
Legend Oaks 4-05	0.00	0.00%

Legend Oaks II 4-06	46.25	4.02%
Voucher 8-01	152.99	13.29%
TOTAL	1151.24	100.00%

Total Hours Service Coord - Only ELE

TOTAL Hours Monthly Total Hours

EastLawn 1-01	24.50	24.75%
Scattered Sites 1-02	8.00	8.08%
Eastlawn Add 2-01	15.50	15.66%
Pioneer Homes 3-01	0.00	0.00%
Storage 3-03	0.00	0.00%
Eastlawn East 4-01	44.00	44.44%
Legend Oaks 4-05	7.00	7.07%
Legend Oaks II 4-06	0.00	0.00%
Voucher 8-01	0.00	0.00%
TOTAL	99.00	100.00%

Legend Oaks II 4-06	0.00	0.00%
Voucher 8-01	0.00	0.00%
TOTAL	160.00	100.00%

Total Hours Maintenance

TOTAL Hours	Monthly Total Hours	
EastLawn 1-01	283.50	42.03%
Scattered Sites 1-02	56.00	8.30%
Eastlawn Add 2-01	192.50	28.54%
Pioneer Homes 3-01	11.50	1.70%
Storage 3-03	1.00	0.15%
Eastlawn East 4-01	106.00	15.72%
Legend Oaks 4-05	11.50	1.70%
Legend Oaks II 4-06	9.00	1.33%
Voucher 8-01	3.50	0.52%
TOTAL	674.50	100.00%

Operating Budget

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

See page four for instructions and Public reporting burden statement

a. Type of Submission Revision No.:	b. Flecklyeer English	c. No. of months (check ane)	(check ane) Other (specify)	9 6	Type of HUD assisted project(s)	project(s) Rental Hou	guis
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Page 1 of 4

Previous editions are obsolete

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Ember hers and on line 810	200		Т	1	((
	3			(5847)	14.27		3,001	-	

form HUD-52564(3/95) ref. Handbook 7475.1 U.S. Department of Housing and Urban Development Office of Public and Indian Housing

See page four for instructions and Public reporting burden statement

	a. Type of Submission		b. Fiscal Year Ending c. No. of months (check one)	c. No. of months (check one)		d. Type of HUD assisted project(s)	o)act(s)	
A Segretary	or of Public Housing	L. Name of Public Housing Ageocylindian Housing Authority (PHANIHA)	TO OUT A	# DO	too.			Help Komer ants Houst	ownership ng
f. Address	f. Address (City, State, zp code)	ঝ			3			nnkey Uf Ho omeownerst	omeowneckip titp
g. ACC Number	Kember		h. PAS/LOCCS Project No	γο.		- fuel	I. HUID Fleid Office		
i. No. of	j. No. of Dwelling Linits	k. No. of Unit Months Available 0	m. No. of Projects						
ļ 				Actual Last Fiscal	X Extinuetos	į	Requested Budget Estimates	ot Estimates	september 44 Charles
	Acet.	Description		30°C	1000 E	F	Bal8	And is	Amount (to nearest \$10)
Homebu	Homebuyers Monthly Payments for:			ì	C				
-	7712 Earned Home Payn	Operating Expense Earned Home Payments				+-+			
_	7714 Nomoutine	7714 Nomouffine Maintenance Reserve	(100 pm (100))			+		-	
98	716 Expess (or	7716 Expess (or deficit) in Break-Even	45, 414 500						
+	790 Homebuye	7790 Homebuyers Monthly Payments - Contra							
7	Operating Receipts 070 3110 Dwallon Restal	ectal	Ç						
++	3120 Excess Utilities	regend	Caks		000		1		
980	3190 Nondwelfing Rental	of lines 070,080 2	T 0000	27.475	54.47X 555,876,655	-	2000,ak		
-	3610 Interest on	Interest on General Fund Investments		9	7				
_	3690 Other Income	me	1000	27.946	15.33		10000		
Operation	otal Remailing	130 total Kenal moone (sunt of lines 100, 110, 410 total Oberating Expenditures - Administration:	in that	27,120	7				
4	4110 Administra	Administrative Salaries		420,585	19,000	1	18,156		
150	4130 Legal Expense	inse			45			+-	
+	4150 Travel	R		(35)	027		4		
-	4170 Accounting Fees	Fees		366	800		2000		
\$ \$	4171 Auditing Fees	Auditing Fees Other Administrative Extenses		1887	N N N		0000		
7	ital Administra	Yotal Administrative Expense (sum of line 140 thru line 200)	thru line 250)	24 436	43,956		22,050		
	Tenznt Services:	7		2 188	X 178		20802	_	•
8 8	4220 Recreation	4220 Recreation, Publications and Other Services	ices	1076x			V (%)		
+	230 Contract C	4230 Contract Costs, Training and Other		1			12/16		
250 Total	ofal Tenant Se	Tenant Services Expense (sum of lines 220, 230, and 240)	220, 230, and 240)	3/XX	3,00		07.0		
# *	4310 Water								
 -	4320 Electricity								
280	4330 Gais 4340 Find								
,	4350 Labor								
310	4390 Other Utilities Expense	fies Expense	1000						
320 115	Sales Ex	320 John Unities Expense (sum of line 200 and line 310)	in solution						

form HUD-52564(3/95) ref. Handbook 7475.1

		ノイオ ア ボスンイトラアソトピングレート・ア・レビング・ア・	2					
		PCD: 440:	Actual	X Estimates				
			X.	Current Budger Y.		THE STATE OF THE S	HUD Modifications	DOM
eg .			20/00	00100		10 /A		Arnount
NG.	Š.	Description (1)	E	PUM (3)	D	S() 3	(e)	(to nearest \$10) (7)
[景	nary Mai	Ordinary Maintenance and Operation:	,	,, -		.0.0		
330	-	4410 [Labor	15,353	18741		17.00.7		
340	-	4420 Materials	338	A80				
350	\vdash	4430 Contract Costs	202					
360	. 1	Total Ordinary Maintenance & Operation Expense (lines 330 to 350)	20,750	19,037		19.08/		
rota	Protective Services:	arvicesc		•				
370		4460 Labor						
380	-	4470 Materials						
380		4480 Contract Costs						
8	Fotal	400 Total Protective Services Expense (sum of lines 370 to 390)						
Ě	General Expense:	79-514		,				
410		4510 Insurance	1.37	ンがなり		1. E. S.		
Ş		4520 Payments in Lieu of Taxes				•		
430		4530 Terminal Leave Payments				,		
5	•	4540 Employee Benefits Contributions	5,818	16501		1500		,
450		4570 Collection Losses						
480	4590	4590 Other General Expense	<u>,</u>					
2	Lotal	470 Total General Expense (sum of lines 410 to 460)	17/88	12.638		8	1	
8	Total	480 Total Routine Expense (sum of lines 210, 250, 320, 360, 400, and 470)	3,45,55	58 799		53.2/7	2	
Ħ	fortes	Rent for Leased Dwellings:	`					
8	4710	490 4710 Rents to Owners of Leased Dwellings						
8	Total	500 Total Operating Expense (sum of lines 480 and 490)					_	
lon	routine	Normoutine Expenditures:			-			
510		4610 Edraordinary Maintenance						
520		7520 Replacement of Nonexpendable Equipment				***************************************		
530		7540 Property Betterments and Additions					_	
ş	Total	540 Total Norrodine Expenditures (s.m. of lines 510, 520, and 530)						
밁	Total	550 Total Operating Expenditures (sum of lines 500 and 540)					1	
Hoz	YearA	Prior Year Adjustments:						
560	******	6010 Prior Year Adjustments Affecting Residual Recelpts						
ŧ	Other Expenditures:	ditures:						
570		Deficiency in Residual Receipts at End of Preceding Fiscal Yr.						
280	Total	Operating Expenditures, including prior year adjustments and						
		other expenditures (fine 550 plus or minus line 560 plus line 570)	6					
욠	_	Residual Receipts (or Deficit) before HUD Contributions and	:					
		provision for operating reserve (line 130 minus line 590)						
1	O Contraction	Advan-		_	<u>.</u>	<u>. </u>		

form HUD-52564(3/95) ref. Handbook 7475.1

HUG Coorthautions:

600 8070 Basic Aurusal Contribution Earned-Leased Projects: Current Year

610 8071 Prior Year Adjustments - (Debth) Crefit

620 Total Basic Aurusal Contribution (line 600 phis or minus line 610)

620 Total Basic Aurusal Contribution (line 600 phis or minus line 610)

620 Total Basic Aurusal Contribution (line 600 phis or minus line 610)

630 Other (specify):

650 Other (specify):

650 Other (specify):

650 Total Year-End Adjustments/Cher (plus or minus lines 640) total (specify):

650 Other (specify):

650 Other (specify):

650 Other (specify):

650 Total Operating Studied-current 1998 (the 800 plus line 690)

700 Residual Receipts (or Deficit) (sum of line 830 plus line 690)

650 Foral HUG Contributions (sum of line 830 plus line 690)

650 Foral Residual Receipts (or Deficit) (sum of line 830 plus line 690)

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

Operating Budget

See page four for instructions and Public reporting burden statement

a. Type of Submission X. Original Ravision No.:	b. Facel Year Ending Ic. No. of months (check one) (p	C. No. of months	(check one)		d. Type of HUD assisted project(s) 01 [PHA/IHA-Owned Romal Housing	project(s) Rectal Hou	grising
e. Name of pupies Housing Agency (1944/1944). LONGE C. HOMES	(PHA/IEM)				02 IFFA Owned Mutual Help Homeownership 03 PHA/IFFA Leased Rental Housing	al Melp Hon Rental Hou	neownership using
				-	04 PHATHA Owned Turnkey (II Homeownership 05 PHATHA Leased Homeownership	furnicey (II Homeowne	Homeownerskip sratip
g. ACC Number	h. PASILOCOS Project No.	Š			E HUD Fleid Office		
j. No. of Dwelling Links R. No. of Unit Months Avelable	m. No. of Projects						
		Actual Lest Fiscal	Estimates or Actual		Requested Budget Estimates	get Estime	Çest
Line Acct. No. Description		'a"	Current Budget y	#O#	PHAVEIA Estimates	2 5	HUD Modifications Amount (to nearest \$10)
~~ 헣~		(2)	Ĉ	£		ē	6
010 7710 Operating Expense 020 7712 Earned Home Payments							
 (
040 Iofai Break-Even Amount (stein of inses UTU, 920, and 030, 050 7716 Excess (or deficit) in Break-Even	u, and uso)						
₩							
Operating Receipts 070 3110 Dwellon Rentel		4000	129 94 Page CH		50.40D		
++							
090 3190 Nondwelling Rental	i ooo						
h	(050)	3	M		1		
_		97/17	12 C		7 10		
130 Total Kental Income (Suff of thes 100, 110, and 120) Overzeiten Ernenditmes - Administration:	(071)	CZO (77707				
140 4110 Administrative Salaries		2,933	3,965		8,826		
150 4130 Legal Expense							
₹130		. 36	36		00/		
4170		1,246	1,340		7,600	1	
190 4171 Auditing Fees		100 XX	×438		0000	\setminus	
+	uts line 200)	5,035	6333		11,726	,	ļ
Tenzit Services:		1	1)		
	**						
					}		
250 Total Tenant Services Expense (sum of lines 220, 230, and 240)	10, 230, and 240)		1				
Utilities: 280 4310 Water		286	85		001		
++		1277	8		700		
-							
290 4340 Fuel							
1390							
320 Total Utilities Expense (sum of line 260 thru line 310)	310)	1,563	585		XOX OX		

Name	Name of PHAITHA	Donoes Homes		Fiscal Year Ending	Finding	7/8		
			Actual	Page 1	}	4		
			Last Facel	Or Actual			LI III Modifications	- Const
Lîne			2016	100		6		Amount
ý	ž.	Description (1)	₹ 8	M €	¥ £	\$ 50	<u> </u>	(to negress(\$10)
Ordita	any Ma	Ordinary Maintenance and Operation:	011	2, 6		01.0		
330	₹	4410 Labor	٦	3,060		27.07		
9	52	Materials	のカゲダ	0007		00001		
8	120	4430 Contract Costs	7,77	200		000,		
360	ota e	360 Total Ordinary Maintenance & Operation Expense (fines 330 to 350)	7114	7,565		X/C/8/		
Prote	CIVES	Protective Services:	•					
3	1	446U (300X						
8 8	\$	4470 Materials						
8	180	Contract Costs						
8	8	400 (1000) Profective Services Expense (sum of times 3/0 to 390)						
e compa	General Expense:	3000	77.7	0		((()	• • • •	
1	2	4010 unteraction	2,4/0	200				1
420	\$20			,				•
5	4530	Terminal Leave Payments	,					
2	\$ \$		1774	440		200		
2	4570	Collection Losses						
4 60	4590	Other General Expense						
470	Total	General Expense (sum of lines 410 to 460)	186	19.42		009://		
8	Total		31898	44.793				
Rent	forLes							
96	27.73	4710 Rents to Owners of Leased Dwellings						
900	Total	Total Operating Expense (sum of lines 480 and 490)						
Non	outine !	Nonroutine Expenditures:	1	1				
510	4613	4610 Extraordicary Maintenance / Inferest on Note.	345	20		}		
520	7520	7520 Replacement of Nonexpendable Equipment						
230	\$	7540 Property Betrements and Additions						
240	Total	Nomoutine Expenditures (sum of lines 510, 520, and 530)				7		
280	Total	550 Total Operating Expenditures (sum of lines 500 and 540)	31443	31443333813		36,704		
Prior	X.est №	Prior Year Adjustments:	•	•		•		
8	6010	6010 Prior Year Adjustments Affecting Residual Receipts						:
Other	Compan	Office Expanditures:						
2/5		Deficiency in Residual Receipts at End of Preceding Fiscal Yr.						
986	100	Operating Expenditures, including prior year adjustments and	_					
		other expenditures (line 550 plus or minus line 560 plus line 570)						
280		Residual Receipts (or Deficit) before HUD Contributions and	. 6 11 1	2000		12/0/21		
		provision for operating reserve (line 130 minus line 580)	400	14000 041 M		12,070		
Đ.	Contrib	HUD Contributions:	,			`		
909	8010	8010 Basic Annual Contribution Earned-Leased Projects:Current Year						
610	8011	8011 Prior Year Adjustments - (Debit) Credit						
620	Total	Basic Annual Confribution (fine 600 plus or minus line 610)						
93	8020	Contributions Eamed-Op, Subsidy:-Cur. Yr.(before year-end ad))						
3		Mandetory PFS Adjustments (ned):						
8		Other (specify):						
86		Other (specify):						
029		Total Year-End Adjustments/Other (plus or minus lines 640 thru 660)						
680	8020	8020 (Total Onerating Subside cyrrent vear - de 630 des pentinas (ee 670)						
	Total C	HUD Contributions (sum of lines 620 and 680)						
		Residual Receipts (or Defictit) (sum of line 590 pius line 690)	637	0010		10101		
		- 1	14 200	が 1.20 1		13,616		
				•		•		

form HUD-52564(3/95) ref. Handbook 7475.1

Budget Worksheet

income and Expense Projections

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

OMB Approval No. 2502-0324 (exp. 12/31/2014)

Federal Housing Commissioner

Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMS control number.

7-1-17-10-1-18 This information is collected in accordance with Title II of the National Housing Act which requires that HUD regulate rents for certain cooperative and subsidized rental projects. The Department formulated the processes by which owners could request increases. The requiremen for tenant participation in the rent increases process, which is included in Section 202(b) of the HCD Amendments of 1978, necessitated that the Department design procedures to give consideration to tenant comments. The information gathered is not of a confidential nature. The information order to obtain benefits 14/8/13 340,588 1,30 p. 12001 Budgetfrom 7-1-16 402-28-17 086'687 384,835 78, 580 086.68 3,934 1801 1081 Name of Project Eastlawn Addition Accello Statement of Profit Loss FY 5100T 343,96 53 446 30,030 Net Rental Revenue (Rent Revenue less Vacancies) 5152N 313,98 460 7 460 5120 131 4C 4543 1056 59001 3,45 50001 3,23 5400T 17 5290 5140 5170 5190 5490 5180 5191 5192 5194 5250 5270 5945 5193 52001 2300 5910 2990 6210 5220 5240 5430 6311 5970 6310 Revenue from Investments-Replacement Reserve 5440 5920 6203 6204 6250 6312 6320 6330 6340 6350 6390 6331 6351 Total Rent Revenue Potential at 100% Occupancy Numbing Homes/ Assisted Living/ Board & Cars/ Other Elderly Carel Coop/ Other Reventuse Revenue from Investments-Residual Receipts Revenue from investments-Miscellaneous Rent Revenue - Stores and Commercial Financial Revenue -Project Operations Interest Reduction Payments Revenue Bookkeeping Fees/Accounting Services Miscellaneous Administrative Expenses Manager or Superintendent Salaries Miscellaneous Iv.Co.so.e Laundry and Vending Revenue Office or Model Apartment Rent Rent Revenue - Gross Potentia Fenant Assistance Payments Total Administrative Expenses Miscellaneous Rent Revenue Garage and Parking Spaces Garage and Parking Spaces Administrative Rent Free Unit Rexible Subsidy Revenue Conventions and Meetings NE%cosoo, Rent Revenue/ Insurance Advertising and Marketing Special Claims Revenue Retained Excess Income Total Financial Revenue Stores and Commercial Miscellaneous Revenue Management Consulants Legal Expenses - Project Other Renting Expense Fotal Other Revenue Rental Concessions Total Vacancies Management Fee Gifts (nonprofits) Office Expenses Fenant Charges Total Revenue Office Salaries Audit Expenses Excess Rent Vacancies Apartments Description of Account. Financial Revenue 5400 Expenses 6200/ 6200/ Явувлие 5900 Іпсояте 5100 Rentai Other

form HUD-92547-A (8/2000)

			And of	7-1-16	7-1-17 7-1-1-1	
Description of Account	of Account	Activo	Acct. No. Statement of Profit Loss FY	Current FY (no. of mos.	Budgetfrom (1th)	
Utilities	Fuel Oli/Coal	6420				
400	Electricity	6450	16,669	18/1/	O8L 71	
	Water	6451	1777	1,437	4.856	
	Sewer	8,53	£78'01	10,440	10 10 X	\
	Total Utifities Expense	6400T	V. 06 3	23.254	(* × × 7 ×)	
Operating	Payroil	6510	65.813	341675	45,730	
e mainten. Expenses		6515	11,422	9,603	12,000	
200	Contracts Operating and Melicianses Deat Committee	6520	•	15,424	028,800	
	Carbana and Trach Demonst	1700	11111	14 / /		
	Security Payroll/Contract (7)	6530	144	1,000	2000	
	Security Rent Free Unit	6531		(4) (4)	10,000	
	Heating/Cooling Repairs and Maintenance	6546				
	Snow Removal	6548		,		
	Vehicle & Maint, Equip. Oper, and Repair	6570		2,434	3,250	*
	Misc. Operating & Maintenance Expenses	06290				\
Tayes and	Total Operating & Maintenance Expenses	6500T	- 7	76,810	(105,58)	
Insurance	.,,	2 3				
6700	Property and Liability Insurance (Hazard)	02.50	10 50X	111/4	10100	
	Fidelity Bond Insurance	22.9			1000	
	Workmen's Compensation	22.5	4.838	3,465	× 900 ×	
	Health Insurance & Other Employee Benefits	6723	33 648	50 126	00,00	
	Misc. Taxes, Licen., Permits, & Insurance	6790	1.260	1267		1
	Total Taxes & Insurance	6700T	50,244	61.409	1 76.500 1	٦,
Financial	Inferest on Mortgage Payable	6820				
Expenses 6800	Interest on Notes Payable (Long-Term) *	6830				
	interest on Notes Payable (Short-Term) *	6840				
	Mortgage Insurance Premium/Service Charge	6850	1.50			
	Miscellareous Financial Expenses	6890	574			
	Total Financial Expenses		574			•
Expenses 6900	Nursing Homes/ Assisted Living/ Board & Care Other Elderly Care/ Coop/ Other Revenues	0069		·	1	٠.,
	Total Cost of Operations	6000T	347.05	232458	307.30	
		•	`			
	Reserve for Replacements Dep. Required					
	Principal Payments Required					
	Debt Service for other approved loans					
	Debt Service Reserve (if required)					
	General Operating Reserve (Coops)					
	Total Cash Requirements	. "	344.795	233,458	307.3/5	
	Lass Total Revenue		323 849	189,980	292.896	
	Net Cash Surplus (Deficiency)		30,946]	(43 478)	(14 4/10)	
	Special Hems	, 46/4cz	37,376			
			1. 1.25			
	tinal lotal		くて、つ			
	tinal lotal			のよう		のでの

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 daims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 110, 1012, 31 U.S.C. 3729, 3802) (Signature)

4

Previous editions are obsolete "+ HUD Approved Secondary Financing page 2 of 2 Only for Budget Projections.

ref. Handook 4350.1

form HUD-92547-A (8/2000)

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

See page four for Instructions and Public reporting burden statement

(to nearest \$10) (7) HUED Modifications PHANIHA Owned Turnkey III Homeownecship Type of HOD assisted project(4)
 X PHyATIA-Owned Revail Housing
 IfA Owned Mutual Help Homeownesthip
 PHATIA Leesed Rental Housing
 PHATIA Leesed Rental Housing
 PHATIA Leesed Rental Housing
 PHATIA Amount ₹ € 281,476 4,000 1,000 3,000 19,200 134,370 26,250 21,000 281,476 1,541 16,360 299,377 1,500 3,500 51,490 104,670 500 8 (to nearest \$10) I. HUD Floid Office. HAVIHA Estimates Amount 6 \$3496 \$500 107.68 \$187 3,000 4.12 \$1,000 3.00 \$4,900 3.00 \$4,848 3,000 2.00 \$4,848 3,000 2.00 \$4,848 3,000 2.00 \$4,848 3,000 2.00 \$4,848 3,000 2.00 24/510 38 400 28858 880 870 1.38 38,340 30,600 16.88 890,30 30,300 888 0.00 888 3.60 27 01 21 60 0.00 0.00 26/510 78,400 289.58 Ž€ b. Fiscal Year Ending c. No. of months (check one)

06/30/18 X 12 no. Other (specify) 2,650 years 21,773 25,000 52,700 Current Budget, yr 2017 PUM X Estimates or Actual 1500 2016 4504 118/91 521 41,754 Last Fiscal Actual 'n, NJ. 1. PASILOCCS Project No. m. No. of Projects 230 4222 Recreation Publications and Other Services
246 4230 Contact Costs, Training and Other
256 Trotal Tenant Services Expense (sum of lines 220, 230, and 249)
 040
 Total
 Break-Eyen Amount (sum of lines 010, 020, and 030)

 050
 773/6
 Excess (or deficit) in Break-Eyen

 050
 7730
 Homebuyers Monthly Payments - Contra

 Operaffing Receipts
 Operaffing Receipts

 190
 4f71
 Audifing Fees

 200
 4f80
 Other Administrative Expenses

 270
 10dai
 Administrative Expense (sum of line 140 thru line 200)
 e. Name of Public Housing Agency/Indian Housing Authority (PHAVIHA)
 070
 3110
 Dweling Rental

 080
 3120
 Excess Utilities

 080
 3190
 Nondwelling Rental

 100
 Total
 Rental tocome (sum of lines 070, 080, and 090)

 170
 3810
 Intruses on General Fund Investments

 120
 3890
 Others income

 130
 Total
 Rental Income (sum of lines 100, 110, and 120)

 Operating Expenditures - Administration:
 350 4350 (Jabor 310 4390 Other Unifides Expense 320 Total Vitildes Expense (sum of time 280 thru line 319). 609 East 3rd Street, Lexington, NE 68850 972 Description 7714 Nomoutine Maintenance Reserve K. No. of Unit Months Revision No.: Available Leangton Housing Authority 7712 Earned Home Payments Homebuyers Bouthly Payments for 140 4110 Administrative Salaries 7719 Operating Expense 170 4150 Travel 180 4170 Accounting Fees f. Address (ofly, State, zip code) 150 4130 Legal Expense 160 4140 Staff Training 260 4310 Water 270 4320 Electricity 280 439 Gas 290 4340 Fluel j. No. of Dwelfing Units 220 4210 Salaries a. Type of Submission 8 ACC 393 Terraint Services: 9. ACC Number ý 를 <u>원</u> 010

Lexington	Lexing	Lexington Housing Authority		106/30/18				
			Actual	X Estimates				
			- X-1	Comment Bridger Ye.		ALF.	HUE Modifications	jour.
Śź	¥od ₹	Description	PUM STOTE		MOM (Amount (to nearest \$10)	Z.	Amount (to nearest \$10)
		(3)	(2)	6	£	(c)	9	3
8 8	44.10	Oxforially mannestitives and Operation:	Jus 17	8/2 (300)	28 62	86 140		
8	18	4420 Materials	デジルの人	2000	20 58	20,000		
350	4430	Contract Costs	12327K		51.73	000.09		
		Total Ordinary Maintenance & Operation Expense (lines 330 to 350)	11:45.1176	18/00	170.93	166,140		
ş	Protective Services:	NY (cost	,					
370	8	4480 abor			800			
380	\$	4470 Malerials			8			
		4460 Contract Costs			8			
\$		Total Protective Services Expense (sum of lines 370 to 390)			8	0		
ġ.	General Expense:	- France	20 151.00	Ý				
5	4510	4510 insurance	24.26	0000	8	30,000		
8	4520	Payments in Lieu of Taxes		I	800	Waived		
830	4530	4530 Terminal Leave Payments		1	0.00			
24	35	Employee Benefits Contributions	0868/	30,000	30.86	30,000		
450	4570	4570 Collection Losses	1.432	2000	3.09	3,000		
480	4590	Other General Expense	18/2	3,000	00.0			
ì	Total	General Eroense (sum of lines 410 to 460)	26000	000	25	63,000	~	
٦	John	480 Total Roufine Expense (sum of lines 210, 250, 320, 360, 400, and 470) - 4	144 1000	12.00	14	416.500		
۱	1	Rent for I exted Dwellings	+	1222				
400	67.77	4710 Seate to Owners of Passed Owellings	***		000			
	Total	Total Operating Fxxense (sum of lines 480 and 490)			428 50	416.500		
	outine F	Nonroutine Expanditures:						
5,10	4610	Extraordinary Maintenance			000	0		
520	l.,,,,	7520 [Replacement of Nonexpendable Equipment			0.00	O		
37	7540	530 19 7540 Property Betterments and Additions			0.0	0		
S	Total	540 Total Nonroutine Expenditures (sum of lines 510, 520, and 530)	ı		i	0		
٦	Total	550 Total Operating Expenditures (sum of lines 500 and 540)	369441	45/20	428.50	416,500		
ě	Year Ac	Prior Year Adjustments:		Circi				
560	6010	8010 Prior Year Adjustments Affecting Residual Receipts			0.00			
ě	Other Expenditures:	iltures:						
570		Deficiency in Residual Receipts at End of Preceding Fiscal Yr.			0.00			
580	Total	Operating Expenditures, including prior year adjustments and	4					
		other expenditures (line 550 plus or minus line 580 plus line 570, 70, 144	111 592	421.12	428.50	416,500		ì
280		Residual Receipts (or Deficit) before HUD Contributions and	· (\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		•		
		provision for operating reserve (fine 130 minus line 580)	78,87	の対域の対対に	120.50	(117,123)		
ě	HUD Contributions	utlons:		Š				
900	8010	8010 Basic Annual Contribution Farned-Leased Projects: Current Year			0.00			
610	8611	Prior Year Adjustments - (Debit) Cradit	-		0.00			
620	Total	Basic Annual Contribution (line 600 plus or minus line 610)			0.00	0		
630	8020	Contributions Earned-Op. Subsidy:-Cur. Yr.(before year-end adj)	109,636	109,636 112,000	123.46	120,000		
640		Mandatory PFS Adjustments (net):	,	,	900			
650		Other (specify):		1	000			•
199		Other (specify):			0.00			
979		chistments/Other (plus or minus lines 640 thru 660)			00.0	0		
T	6	Total Operation Schools served were the est succession for (77)	1172/601	1/000	123.46	120,000		
		Total Operating Subsicy Cartery year 1888 Say parce make an exp		Ĵ,	173.46	120 000		
8	otal	T	07,630	10000	2	2001		
	-	Residual Receipts (or Deficit) (sum of line 590 plus line 690)	7.00					
		The state of the first own	() > - > -	X	200	2,877		

Page 2 of 4

OMB Approval No. 2577-0026 (Exp. 10/31/2009)

U.S. Department of Housing and Urban Development

> Schedule of Administration Expense Other Than Salary

Operating Budget

Office of Public and Indian Housing

existing data sources, gaftering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct Public Reporting Burden for this collection of information is estimated to average I hour per response, including the time for reviewing instructions, searchi this information is required by Section 6 (c)(4) of the U.S. Housing Act of 1937. The information is the operating budget for the low-income housing prog or sponsor, and a person is not required to respond to, a collection of univariation unless that collection displays a valid OMB control number

and provides a summary of proposed/budgeted receipts and expeditures, approval of budgeted receipts and expenditures, and justifications of certain specifications become amounts. HUD reviews the information to determine if the operating plan adopted by the PHA and the amounts are reasonable and that the PHA is in comparing procedures prescribed by HUD. Responses are required to obtain benefits. This information does not lend itself to confidentiality. 9 Fiscal Year End: ¢ 06/30/18 0 Section 8 9 ¢ 0 Development € Management 0 c 0 6 exington, NE Lexington, NE 1,200 19,200 29,700 0 2,900 0 Ф 3,400 200 4,000 Use Van 1,000 1,000 3,000 2,000 1,700 6,000 4,000 Locality [5] [5] Tenant Screening Trips To Conventions and Meetings (list and provide justification) Administrative Services Contracts (list and provide justification) (list organization and amount) & Advertising Copy Machine 18 Total Administrative Expense Other Than Salaries Legal Expense (see Special Note in Instruction) Telephone, Fax, Electronic Communications Other Sundry Expense (provide breakdown) Collection Agent Foes and Court Costs Forms, Stationary and Office Supplies Description Training (list and provide justification) Outside Area of Jurisdiction 3 Within Area of jurisdiction Membership Dues and Fees Lexington Housing Authority Rental of Office Space Lexington Housing Authority Name of Housing Authority. Publications Total Sundry Total Travel Accounting Auditing SHIP 17 41 9 ဌ 3 7 2 36

To the best of my knowledge, all of the information stated herein, as well as any information provided in the accompaniment forewith, is true and accurate. Warning: HUD will prosecute fake claims and statements. Conviction may result in criminal and/or eivil penalties. (18 U.S.C. 1001, 1010, 1012, 31 U.S.C. 3729, 3802)

Signature of authorized representative & Date:

Page 1 of 2

form HUD-52571(3/95) ref Handbook 7475.1

Operating Budget

Summary of Budget Data and Justifications

U.S. Department of Housing and Urban Development

"OMB Approval No. 2577-3028 (Exp. 10/31/2009)

Office of Pubic and Indian Housing

06/30/18 Lexington, NE Lesángton Housing Authority Operating Receipts

Dwelling Rental: Explain basis for estimate. For HUD-aided low-rent housing, other than Section 23 Leased housing, state amount of latest available total HA monthly rent roll, the number of whelling units available for occupancy and the number accepted for the same month each Che HA policy rewisions and economic and other factors which may result in a greater or lesser awayage monthly rent roll during the Requested Budget Year. For Section 23 Leased housing, state the number of units under lease, the PUM lease price, and whether or not the cost of utilities is included, if not included, explain method for payment at utility costs by HA andfor tenant.

Last 8 months rect x 2 Dec., 2018 thru May, 2017 Rent = \$140,738 X2 =

Excess Utilities: (Not for Section 23 Lessed housing.) Check appropriate spaces in fam 1, and explain "Other". Under fear. 2, explain basis for determining excess talify consumption. For example, Gast individual check meters at CH-160-1, proation of excess over allowances at OH-160-2, etc. Cite effective date of present utility allowances. Explain anticipated changes in allowances or offer factors which will cause a significant change in the total amount of excess utility changes during the Requested Brodget Year.

Utfly Services Surcharged:

2. Comments

(Specify) Other Electricity. TOTAL: Nondwelling Rent. (Not for Section 23 Leased Housing.) Complete Itom 1, specifying each space rented, to whom, and the rental terms. For exampler. Community Building Space - Nursey School - SSG per month, etc. Cite changes enticipated during the Requested Budget Yeer affecting estimated Non-dwelling Rental knowns.

Rental Terms				form HUD-52573 (3/85) ref Handbooks 7475.1
То Whom		To a large the second section of the section of the second section of the section of the second section of the sectio	TOTAL:	Page 1 of 4
1 Space Rented	2. Comments			Previous Euffors are obsoble

Page 1 of 4

Previous Editions are obsolete

Interest on General Fund Investments: State the amount of present General Fund investment and the percentage of the General Fund it represents. Explain discusses such as increased or decreased operating reserves, dwelling rest, operating expenditures, etc., which will affect estimated average monthly total investments in the Requested Budget Year. Explain basis for distributions of Interest income between housing programs.

					1,541
					TOTAL:
BUCKET	20750	1/600	#670C		308,103×1/2%
Const Markon Book	Green standard Louis	Timingoe benak	COMPESSION DAMA		

Other Commants on Estimates of Operating Receiptes. Give comments on all other significant soutces of income which will present a clear and understanding of the HA's prospective Operating Receipts shuaton during the Requested Budget Year. For Section 23 Leased housing explain basis for estimate of utility charges to tenants.

11,500 2,000 1,100 1,760	TOTAL: 16.360
Cable TV Late Charges Meintenance Charges Latiandry Collections	

Operating Expenditures

Summary of Staffing and Salary Data

Complete the summary of information below on the basis of information shown on form HUD-52568, Schedule of all Positions and salaries, as follows:

Complete the summary of information below on the basis of information strown on form HUD-52568.

Column (2) Enter the total number of positions designated with the corresponding account line symbol as shown in Column (1), form HUD-52568.

Column (2) Enter the number of equivalent full-three positions allocable to HUD-eided foursing in management. A HA has stress "A-NIT" positions allocable to such housing at the rate of 80%, 170%, and 50% respectively. Thus, the equivalent full-three position is two. (8/10 + 7/10 + 5/10).

Column (3) Enter the portion of total salary expenses shown in Column (5) or Column (6) from HUD-52568, allocable to HUD-aided housing in management, other than Section 23 Leased housing

Column (4) Emer the portion of total sealory expenses shown in Column (5) or Column (10), from HUD-52366, allocable to Section 23 Leased bousing in management.
Column (5) Enter the portion of total sealory expense shown in Column (5) or Column (7), from HUD-52566, allocable to Modernization programs (Comprehensive Improvement Assistance Program or comprehensive Grant Program).

Column (6) Enter the portion of total salary expense shown in Column (5) or Column (9), form HUD-52566, allocable to Section 8 Programs.

Note: The number of equivalent full-time positions and the amount of salery expenses for all positions designated "M" on form HUD-52566 must be equitably distributed to account times Ordinary Maintenance work Projects, and Betterments and

Additions Work Projects.				***************************************		
	···		HODE	HUD-Aded Management Program	Program	
	- Jan. 144	Equivalent		Salary E	Salary Expenses	
	Total Number	Full-Time		Section 23 leased Modernization	Modernization	Section 8
Account Line	of positions (1)	Positions (2)	Management (3)	Management Housing Only (3) (4)	Programs (5)	Program (6)
Administration-Nontechnical Salaries 1						
Administration—Technical Salaries 1						
Ordinary Maintenance and Operation-Labor 1						
URibles—Labor 1						
Other (Specify) (Legal, etc.) 1						
Edraordinary Maintenance Work Projects 2						
Betterments and Additions Work Projects 2						
				Contract Con	Star free short Complement to the	40.4

1 Carry forward to the appropriate line on HUD-SZS64, the amount of salary expense shown in column (3) on the corresponding line above. Carry forward to the appropriate line on HUD-SZS64 (Section 23 Leazed Housing Budget), the amount of salary expense strown in column (4) on the corresponding line above.

2 The amount of salary expense distributed to Extraordinary Maintenance Work Projects and to Betterments and Additions Work Projects is to be included in the cost

of each individual project to be performed by the HA staff, as shown on form HUD-52567. Previous Editions are obsolete

form HUD-52573 (3/95) ref Handbooks 7475,1

Page 2 of 4

Specify all proposed new positions and all present positions to be abolished in the Requested Budget Year. Gits prior HUD concurrence in proposed staffing dranges or present justification for such changes. Gits prior HUD concurrence in proposed salary increases for Administration Staff or give justification and pertinent comparability information. Gits effective date for current approved wage rate (form HUD-5/2158) and justify all deviations from these rates.

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Trave) Publication, Mambership Dues and Fees, Telephone and Telegraph, and Sundry: In addition to "Lustification for Travel to Convection and Meetings" shown on from HUD-52571, give an explanation of substantial Requested Budget Year estimated increase over the PUM rate of expenditures for these accounts in the Current Budget Year. Explain basis for allocation of each element of these expenses.

SEE HUD FORM 52571

utilities. Give an explanation of substantial Requested Budget Year estimated increase over the PUM rate for each utility service in the Current Budget Year. Describe and state estimated cost of each element of "Other Utility Expense."

3,500	21,000	138	
Water	S I	Labor	

Using a 5% increase 51,500

TOTAL:

estimated increase over the PUM rate of					20 cho	
Ordinary Maintanance & Operation-Materials: Give an explanation of substantial Requested Budget Vear estimated increase over the PUM rate of expenditures for maters in the Current Budget Year.						
Ordinary Maintenance & Operation-Materials: Gi expenditures for matters in the Current Budget Year.	Projecting no Increase				-	

Ordinary Maintenance & Operation—Contract Costs: List each ordinary maintenance and operation service contracted for and give the estimated cost for each. Cite and justity new contract services proposed for the Requested Budget Year. Explain substantial Requested Budget Year increases over the PUM nate of expenditure for Contract Services in the current Budget Year. If LIA has contract from minimarines of elevation cabs, give contract cost per cab.

		A TO COMPANY OF THE PARTY OF TH					FOT 61 - 50 DOO	
27,260	2,600	7,600	8,200	1,700	12,640	THE CONTRACT OF THE CONTRACT O		
Actual 2017 Costs Misc. Contracts	Trash	Grounds	Edeeminaling	Pfumber	Anticipated increases			

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Page 3 of 4

form HUD-52573 (3/95) ref*Handbooks 7475.1

Property Labring Labri	
Vertice insulation	
TOTAL	30,000
Employae Benefit Contribritions: List all Employee Bonefit plans participated in. Give justification for all plans to be instituted in the Requested Budget Year for which pror Concurrence has not been given	etification for all plans to be instituted in the Requested Budget Year
FICA \$ 190,612 X7.65% Payrod Health Insurance Unit insurance Regiment	74,500
TOTALE	30,000
Collection Losses: State the humber of tenrants accounts receivable to be written off and the number and total amount of all accounts receivable for both present and vacated tenrants as of the month to which the estimate was computed	the number and total amount of all accounts receivable for both
Artiticipated Collection Losses	3,000
TOTAL	3,000
Extraordinary Naintenance, Replacement of Equipment, and Betternants and Additions: Cite prior HUD sporoval or give justification for each noniculine work project included in the Requested Budget and for those for future years which make up the estimate on form HUD-S2570. Justifying information incorporated on or attached to formHUD-S257 need not be repeated here.	ions: Cite prior HUD sporoval or give justification for each nonroutine up the estimate on form HUD-52570, Justifying information

Insurance: Give an explanation of substantial Requested Budget Year estimated increases in the PUM rate of expenditues for insurance over the Current

Budget Year, Oite changes in coverage, premium rates, etc.

SEE HUD FORM 52567

Contracts: List all confacts, other than those listed on page 3 of this form under Ordinary Maintenance & Operation (OMO). Cite the manne of the contracts, type of contract, cost of contract and contract period. Justification must be provided for all contract services proposed for the requested Budget Year (RBY). Explain substantial RBY increases over the PUM rate of expenditure for these contracts on the Current Budget Year

Name Ambapated

form HUD-52573 (3/95) ref Handbooks 7475.1

Previous Editions are obsolete

Page 4 of 4

*ONAB Approval No. 2677-0026 (Exp. 10/51/2009)

U.8. Bepartment of Housing And Urban Development and Urban Development Office of Public ond Indian Housing

Operating Budget Schedule of Nontoutine Expenditures

See back page for instruodone and Public reporting burden statement

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Budget for year ending 2017

81 48 7 106 18 154 Section 8 Housing Public New GL Pioneer Develpoment Choice GL Management Housing Const **NUMBER Homes** Fund Corp Voucher Totals NUMBER ELE Total W ELE Income 311000 **Dwelling Income** 281,981.44 115,642.93 49,149.20 0.00 446,773.57 512000 46,989.00 493,762.57 0.00 0.00 512100 Rent Supplement 0.00 168,376.00 168,376.00 28,763.00 197,139.00 **Unrestricted Net Position** 280600 0.00 0.00 0.00 0.00 0.00 30,059.70 0.00 0.00 30,059.70 330001 Fraud Recovery Admin 0.00 0.00 0.00 0.00 0.00 92.50 0.00 0.00 92.50 360000 **HUD ACC Admin Fee** 0.00 0.00 0.00 0.00 0.00 80.133.34 0.00 0.00 80.133.34 0.00 0.00 0.00 0.00 18.13 0.00 0.00 361000 Interest General Fund Investments 0.00 18.13 **Total Rental Income** 281,981.44 284,018.93 49,149.20 0.00 0.00 110,303.67 725,453.24 75,752.00 801,205.24 0.00 3.67 6.71 0.00 0.00 1,441.49 0.00 1,441.49 361000 Interest General Fund Investments 1,431.11 369000 Other Income / Tenant Revenue 24,371.54 13,345.20 689.55 19,945.14 0.00 0.00 58,351.43 0.00 58,351.43 369001 Other Income / Misc 600.00 0.00 0.00 0.00 0.00 0.00 600.00 0.00 600.00 0.00 0.00 32,519.47 369600 Management Fee Earned 0.00 32,519.47 0.00 32,519.47 802000 Operating Subsidy 107,054.00 0.00 0.00 0.00 0.00 0.00 107,054.00 0.00 107,054.00 530101 530101 Laundry Income 0.00 1.555.50 0.00 0.00 0.00 0.00 1.555.50 1.274.20 2.829.70 530103 **Excess Utilities** 0.00 84.00 0.00 0.00 0.00 0.00 84.00 530103 126.00 210.00 541000 823.87 0.00 0.00 0.00 823.87 541000 77.46 901.33 Interest Income 0.00 0.00 541000 Interest Income on Notes Recievable 0.00 6,680.00 0.00 0.00 0.00 0.00 6,680.00 0.00 6,680.00 590000 Other Income 590000 5,640.50 5,640.50 **Total Other Operating Receipts** 133,456.65 22,488.57 693.22 52,471.32 0.00 0.00 209,109.76 7,118.16 216,227.92 **Total Receipts** 415,438.09 306,507.50 49.842.42 52,471.32 0.00 110,303.67 934,563.00 82,870.16 1,017,433.16 **Operating Expenses** 411000 Admin Salary 76,426.13 85,558.86 631000 4,466.76 24,582.22 0.00 40,377.05 231,411.02 0.00 231,411.02 0.00 30,593.79 631067 0.00 2,407.51 0.00 33,001.30 0.00 33,001.30 411008 Tenant Service Coordinator 0.00 411045 Employee Benefits Admin 18,415.68 0.00 0.00 0.00 0.00 0.00 18,415.68 0.00 18,415.68 411050 Accrued Absenses Admin 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 167.28 0.00 0.00 0.00 0.00 90.00 280.28 413000 Legal Expenses 23.00 190.28 634000 414000 Staff Training 542.04 0.00 0.00 29.99 0.00 482.50 1,054.53 0.00 1,054.53 415000 Travel 371.32 829.45 631101 23.76 78.06 0.00 96.43 1,399.02 0.00 1,399.02 417000 Accounting Fees 2.416.00 0.00 1.218.00 962.50 175.50 2.609.00 7.381.00 635100 1.028.00 8.409.00 417100 Audit Fees 1,973.00 1,118.50 635000 132.00 858.00 0.00 2,768.50 6,850.00 635000 3,950.00 10,800.00 419000 Sundry - Admin 3,025.71 1,129.00 635100 185.28 1,542.92 0.00 3,972.85 9,855.76 0.00 9,855.76 419008 Advertising 2,526.49 4,382.31 621000 118.52 194.70 0.00 1,236.71 8,458.73 621000 621.85 9,080.58 632000 Management Fee 632000 6,358.00 6,358.00 419011 Publications 652.10 0.00 5.34 12.46 0.00 302.98 972.88 0.00 972.88 419012 Membership dues and fees 483.90 0.00 9.60 0.00 0.00 312.50 806.00 0.00 806.00 2.524.55 636000 182.95 420.96 0.00 929.59 4.782.84 1.598.12 6.380.96 419013 Telephone 724.79 636000 419014 Rental of Office Space 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 419017 Forms and Office Supplies 5,522.88 768.90 631100 346.06 816.97 0.00 760.72 8,215.53 0.00 8,215.53 419018 Other Sundry Expenses 1,591.62 0.00 0.00 0.00 0.00 0.00 1,591.62 0.00 1,591.62

419019 Tenant Screening	3,377.06	0.00	0.00	21.00	0.00	2,101.27	5,499.33		0.00	5,499.33
440000 Maintenance and Operation	0.00	0.00	0.00	0.00	0.00	4,933.03	4,933.03		0.00	4,933.03
602300 Conventions and Meetings	0.00	456.00	0.00	0.00	0.00	0.00	456.00		0.00	456.00
625000 Other Renting Expenses	0.00	338.01	0.00	0.00	0.00	0.00	338.01		0.00	338.01
635140 Tech Training	0.00	3,840.59	0.00	0.00	0.00	0.00	3,840.59		0.00	3,840.59
637000 Bad Debt Expenses	0.00	57.70	0.00	0.00	0.00	0.00	57.70	637000	227.54	285.24
639000 Misc Admin Expenses	0.00	15,988.40	0.00	0.00	0.00	0.00	15,988.40	639000	1,044.73	17,033.13
			0.00	0.00	0.00	0.00	0.00		0.00	0.00
Total Administrative Expenses	120,015.76	145,786.30	6,688.27	31,927.29	198.50	60,883.13	365,499.25		14,918.24	380,417.49
Tenant Services Training	24.00	0.00	0.00	0.00	0.00	0.00	24.00			24.00
Resident Participation	956.31	0.00	0.00	0.00	0.00	0.00	956.31			956.31
Total Tenant Services Expenses	980.31	0.00	0.00	0.00	0.00	0.00	980.31			980.31
Total Tellant Services Expenses	500.51	0.00	0.00	0.00	0.00	0.00	0.00			980.31
Water	3,271.31	1,643.15	55.25	0.00	0.00	0.00	4,969.71	645100	3,777.05	8,746.76
Electricity	21,480.13	16,626.21	584.40	0.00	0.00	0.00	38,690.74	645000	17,055.31	55,746.05
Gas	19,442.68	18,340.32	0.00	0.00	0.00	0.00	37,783.00		0.00	37,783.00
Sewer	0.00	824.36	0.00	0.00	0.00	0.00	824.36		0.00	824.36
Cable	0.00	17,220.34	0.00	0.00	0.00	0.00	17,220.34	646400	8,024.75	25,245.09
Other Utility Expenses	44,194.12	0.00	0.00	0.00	0.00	0.00	44,194.12		0.00	44,194.12
Total Utility Expenses	88,388.24	54,654.38	639.65	0.00	0.00	0.00	143,682.27		28,857.11	172,539.38
441000 Maintenance Labor	76,919.15	0.00	3,967.14	17,725.97	0.00	0.00	98,612.26		0.00	98,612.26
441045 Employee Benefits - Maint	17,714.61	0.00	0.00	0.00	0.00	0.00	17,714.61		0.00	17,714.61
441050 Accrued Absenses Maint	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
442000 Materials	25,967.60	0.00	836.23	314.38	0.00	0.00	27,118.21		0.00	27,118.21
443000 Contract Costs	27,899.11	0.00	967.84	0.00	0.00	0.00	28,866.95		0.00	28,866.95
443100 Garbage	3,553.83	0.00	0.00	0.00	0.00	0.00	3,553.83		0.00	3,553.83
443200 Heating and Cooling	1,073.80	0.00	258.66	0.00	0.00	0.00	1,332.46		0.00	1,332.46
443500 Grounds and Landscape	10,245.28	0.00	85.00	0.00	0.00	0.00	10,330.28		0.00	10,330.28
443600 Unit Turnaround Contract Costs	4,863.50	0.00	0.00	0.00	0.00	0.00	4,863.50		0.00	4,863.50
443700 Electrical Contract Costs	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443800 Plumbing Contract Costs	4,054.75	0.00	0.00	0.00	0.00	0.00	4,054.75		0.00	4,054.75
443900 Exterminating	15,829.60	0.00	1,063.05	0.00	0.00	0.00	16,892.65		0.00	16,892.65
651000 Maintenance Payroll	0.00	66,695.41	0.00	0.00	0.00	0.00	66,695.41		0.00	66,695.41
651067 Employee Benefits Maint	0.00	24,034.98	0.00	0.00	0.00	0.00	24,034.98		0.00	24,034.98
651500 Building Maintenance Supplies	0.00	14,592.92	0.00	0.00	0.00	0.00	14,592.92	651500	5,008.54	19,601.46
651700 Janitorial	0.00	0.00	0.00	0.00	0.00	0.00	0.00	651700	2,030.67	2,030.67
651900 Extermination Contract	0.00	6,161.04	0.00	0.00	0.00	0.00	6,161.04	651900	1,908.95	8,069.99
652000 Contracts	0.00	5,051.25	0.00	0.00	0.00	0.00	5,051.25		0.00	5,051.25
652011 Contract Mowing	0.00	4,945.39	0.00	0.00	0.00	0.00	4,945.39	652011	375.00	5,320.39
652012 Contract Lawn Fert								652012	805.55	805.55
652013 Sprinkler System Contract	0.00	835.25	0.00	0.00	0.00	0.00	835.25	652013	925.80	1,761.05
652040 Contract Plumbing	0.00	961.60	0.00	0.00	0.00	0.00	961.60		0.00	961.60
652060 Contract Fire Safety Services	0.00	32.50	0.00	0.00	0.00	0.00	32.50	652060	325.00	357.50
652080 Unit Turnaround	0.00	2,682.86	0.00	0.00	0.00	0.00	2,682.86	652080	1,956.84	4,639.70
652500 Garbage Removal	0.00	2,877.34	0.00	0.00	0.00	0.00	2,877.34	652500	650.00	3,527.34
653700 Grounds Contract	0.00	0.00	0.00	0.00	0.00	0.00	0.00	653700	1,800.00	1,800.00
654100 Repairs - Supplies and Materials	0.00	104.99	0.00	0.00	0.00	0.00	104.99		0.00	104.99

654200 Repairs Contract	0.00	285.74	0.00	0.00	0.00	0.00	285.74	654200	6,380.80	6,666.54
654600 Heating and Cooling	0.00	210.00	0.00	0.00	0.00	0.00	210.00	654600	1,825.30	2,035.30
657000 Vehicle and Maint Equip Repair	0.00	3,428.49	0.00	0.00	0.00	0.00	3,428.49		0.00	3,428.49
659000 Misc Maintenance	0.00	3,765.20	0.00	0.00	0.00	0.00	3,765.20	659000	88.25	3,853.45
Total Maintenance Expenses	188,121.23	136,664.96	7,177.92	18,040.35	0.00	0.00	350,004.46		24,080.70	374,085.16
660000 Depreciation Expense	0.00	79,170.25	0.00	0.00	0.00	0.00	79,170.25	660000	18,170.44	
Total Depreciation Expense	0.00	79,170.25	0.00	0.00	0.00	0.00	79,170.25		18,170.44	97,340.69
451000 Insurance Property	23,161.00	0.00	11,160.44	0.00	0.00	313.34	34,321.44		0.00	34,634.78
451100 Insurance Liability	2,070.79	0.00	20.00	0.00	0.00	2,576.19	2,090.79		0.00	4,666.98
451200 Insurance W/C	5,617.07	0.00	252.60	0.00	0.00	2,300.08	5,869.67		0.00	8,169.75
451300 Insurance Other	1,982.71	0.00	15.83	0.00	0.00	226.80	1,998.54		0.00	2,225.34
454000 Employee Benefits Contributions Admin	0.00	0.00	1,146.32	0.00	0.00	0.00	1,146.32		0.00	1,146.32
454041 Employee Benefits Contributins Admin	0.00	0.00	0.00	0.00	0.00	18,354.88			0.00	18,354.88
454044 Employee Benefits Contributions Maint	0.00	0.00	997.90	0.00	0.00	0.00	997.90		0.00	997.90
457000 Collection Losses	3,870.66	0.00	219.97	0.00	0.00	0.00	4,090.63		0.00	4,090.63
458000 Interest Admin / Sundry Notes	0.00	0.00	20.33	0.00	0.00	0.00	20.33		0.00	20.33
459000 Other General Expenses	35.31	0.00	0.00	0.00	0.00	5,264.55	35.31		0.00	5,299.86
672000 Property and Liability Ins	0.00	12,146.77	0.00	0.00	0.00	0.00	12,146.77	672000	4,578.00	16,724.77
672100 Fidelity Bond Insurance	0.00	313.33	0.00	0.00	0.00	0.00	313.33		0.00	313.33
672200 Workers Comp Insurance	0.00	5,438.12	0.00	0.00	0.00	0.00	5,438.12		0.00	5,438.12
679000 Insurance Other	0.00	267.06	0.00	0.00	0.00	0.00	267.06		0.00	267.06
690000 Service Coordinator Contract								690000	3,594.62	3,594.62
Total General Expenses	36,737.54	18,165.28	13,833.39	0.00	0.00	29,035.84	97,772.05		8,172.62	105,944.67
Total General Expenses Total Routine Expenses	36,737.54 434,243.08	18,165.28 434,441.17	13,833.39 28,339.23	0.00 49,967.64	0.00 198.50	29,035.84 89,918.97	97,772.05 947,189.62		8,172.62 94,199.11	1,041,388.73
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Total Routine Expenses	434,243.08	434,441.17	28,339.23	49,967.64	198.50	89,918.97	947,189.62		94,199.11	-
Total Routine Expenses 468000 Special Items - Net gains / losses	434,243.08 (35,398.04)	434,441.17 0.00	28,339.23 0.00	49,967.64 0.00	198.50 0.00	89,918.97	947,189.62 (35,398.04)		94,199.11 0.00	1,041,388.73
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses	434,243.08 (35,398.04) (35,398.04)	434,441.17 0.00 0.00	28,339.23 0.00 0.00	49,967.64 0.00 0.00	198.50 0.00 0.00	89,918.97 0.00 0.00	947,189.62 (35,398.04) (35,398.04)		94,199.11 0.00 0.00	1,041,388.73
Total Routine Expenses 468000 Special Items - Net gains / losses	434,243.08 (35,398.04)	434,441.17 0.00	28,339.23 0.00	49,967.64 0.00	198.50 0.00	89,918.97	947,189.62 (35,398.04)		94,199.11 0.00	1,041,388.73
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses 692003 Casualty Loss Contract	434,243.08 (35,398.04) (35,398.04) 0.00	434,441.17 0.00 0.00 327,991.66	28,339.23 0.00 0.00	49,967.64 0.00 0.00 0.00	198.50 0.00 0.00	89,918.97 0.00 0.00	947,189.62 (35,398.04) (35,398.04) 327,991.66		94,199.11 0.00 0.00	1,041,388.73
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses 692003 Casualty Loss Contract 692004 Casualty Loss Proceeds	434,243.08 (35,398.04) (35,398.04) 0.00	434,441.17 0.00 0.00 327,991.66 (151,342.68)	28,339.23 0.00 0.00 0.00 0.00	49,967.64 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	89,918.97 0.00 0.00 0.00 0.00	947,189.62 (35,398.04) (35,398.04) 327,991.66 (151,342.68)		94,199.11 0.00 0.00 0.00 0.00	1,041,388.73
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses 692003 Casualty Loss Contract 692004 Casualty Loss Proceeds Total Non Routine Expenses	(35,398.04) (35,398.04) (35,398.04) 0.00 0.00	434,441.17 0.00 0.00 327,991.66 (151,342.68) 176,648.98	28,339.23 0.00 0.00 0.00 0.00	49,967.64 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	89,918.97 0.00 0.00 0.00 0.00	947,189.62 (35,398.04) (35,398.04) 327,991.66 (151,342.68) 176,648.98		94,199.11 0.00 0.00 0.00 0.00 0.00	1,041,388.73 (35,398.04) 176,648.98
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses 692003 Casualty Loss Contract 692004 Casualty Loss Proceeds Total Non Routine Expenses Total Expenses	(35,398.04) (35,398.04) (35,398.04) 0.00 0.00	434,441.17 0.00 0.00 327,991.66 (151,342.68) 176,648.98 611,090.15	28,339.23 0.00 0.00 0.00 0.00 0.00 28,339.23	49,967.64 0.00 0.00 0.00 0.00 0.00 49,967.64	198.50 0.00 0.00 0.00 0.00 0.00	89,918.97 0.00 0.00 0.00 0.00 0.00 89,918.97	947,189.62 (35,398.04) (35,398.04) 327,991.66 (151,342.68) 176,648.98 1,178,359.53		94,199.11 0.00 0.00 0.00 0.00 0.00 94,199.11	1,041,388.73 (35,398.04) 176,648.98 1,272,558.64
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses 692003 Casualty Loss Contract 692004 Casualty Loss Proceeds Total Non Routine Expenses Total Expenses	(35,398.04) (35,398.04) (35,398.04) 0.00 0.00	434,441.17 0.00 0.00 327,991.66 (151,342.68) 176,648.98 611,090.15	28,339.23 0.00 0.00 0.00 0.00 0.00 28,339.23	49,967.64 0.00 0.00 0.00 0.00 0.00 49,967.64	198.50 0.00 0.00 0.00 0.00 0.00	89,918.97 0.00 0.00 0.00 0.00 0.00 89,918.97	947,189.62 (35,398.04) (35,398.04) 327,991.66 (151,342.68) 176,648.98 1,178,359.53		94,199.11 0.00 0.00 0.00 0.00 0.00 94,199.11	1,041,388.73 (35,398.04) 176,648.98 1,272,558.64
Total Routine Expenses 468000 Special Items - Net gains / losses Total NonRoutine Expenses 692003 Casualty Loss Contract 692004 Casualty Loss Proceeds Total Non Routine Expenses Total Expenses Total Income	434,243.08 (35,398.04) (35,398.04) 0.00 0.00 398,845.04 415,438.09	434,441.17 0.00 0.00 327,991.66 (151,342.68) 176,648.98 611,090.15 306,507.50	28,339.23 0.00 0.00 0.00 0.00 0.00 28,339.23 49,842.42	49,967.64 0.00 0.00 0.00 0.00 0.00 49,967.64 52,471.32	198.50 0.00 0.00 0.00 0.00 0.00 198.50 0.00	89,918.97 0.00 0.00 0.00 0.00 0.00 89,918.97 110,303.67	947,189.62 (35,398.04) (35,398.04) 327,991.66 (151,342.68) 176,648.98 1,178,359.53 934,563.00		94,199.11 0.00 0.00 0.00 0.00 0.00 0.00 94,199.11 82,870.16	1,041,388.73 (35,398.04) 176,648.98 1,272,558.64 1,017,433.16

Budget for year ending 2018

81 48 7 106 18 154 Section 8 Housing Public Pioneer GL New Management Develpoment Choice NUMBER Homes Const Voucher Totals NUMBER ELE Total W ELE Housing Fund Corp Income 311000 Dwelling Income 390,528.00 280,400.00 50,400.00 0.00 494,000.00 1,215,328.00 512000 46,989.00 1,262,317.00 512100 28,763.00 Rent Supplement 0.00 0.00 0.00 0.00 0.00 28,763.00 0.00 0.00 280600 Unrestricted Net Position 0.00 0.00 0.00 0.00 0.00 0.00 0.00 330001 0.00 0.00 0.00 0.00 0.00 0.00 Fraud Recovery Admin 0.00 0.00 0.00 360000 **HUD ACC Admin Fee** 0.00 0.00 0.00 0.00 0.00 75,000.00 0.00 0.00 75,000.00 361000 Interest General Fund Investments 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 Vacancies (97,632.00) 292,896.00 50,400.00 1,192,696.00 75,752.00 1,268,448.00 **Total Rental Income** 280,400.00 0.00 0.00 569,000.00 0.00 870.00 0.00 0.00 0.00 870.00 870.00 361000 Interest General Fund Investments 0.00 0.00 369000 Other Income / Tenant Revenue 84.00 0.00 0.00 0.00 0.00 0.00 84.00 0.00 84.00 369001 Other Income / Misc 13,239.00 0.00 0.00 0.00 0.00 0.00 13,239.00 0.00 13,239.00 369600 Management Fee Earned 0.00 0.00 0.00 36,000.00 0.00 0.00 36,000.00 0.00 36,000.00 802000 Operating Subsidy 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 530101 Laundry Income 1,620.00 0.00 0.00 0.00 0.00 0.00 1,620.00 530101 1,274.20 2,894.20 530103 **Excess Utilities** 0.00 0.00 0.00 0.00 0.00 0.00 0.00 530103 126.00 126.00 541000 0.00 0.00 0.00 0.00 0.00 0.00 0.00 541000 77.46 77.46 Interest Income 0.00 15,000.00 0.00 541000 Interest Income on Notes Recievable 0.00 0.00 0.00 15,000.00 0.00 15,000.00 590000 Other Income 22,600.00 590000 5,640.50 28,240.50 **Total Other Operating Receipts** 14,943.00 23,470.00 0.00 51,000.00 0.00 0.00 89,413.00 7,118.16 96,531.16 307,839.00 50,400.00 51,000.00 569,000.00 1,282,109.00 82,870.16 **Total Receipts** 303,870.00 0.00 1,364,979.16 **Operating Expenses** 411000 Admin Salary 59,200.00 85,000.00 631000 8,826.00 18,156.00 0.00 50,984.00 222,166.00 0.00 222,166.00 631067 2,080.00 0.00 2,080.00 2,080.00 411008 Tenant Service Coordinator 0.00 0.00 0.00 0.00 0.00 411045 Employee Benefits Admin 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 411050 Accrued Absenses Admin 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 413000 Legal Expenses 0.00 500.00 0.00 0.00 23.00 0.00 523.00 634000 90.00 613.00 414000 Staff Training 2,000.00 0.00 400.00 2,400.00 0.00 2,400.00 0.00 0.00 0.00 415000 Travel 0.00 1,000.00 631101 100.00 0.00 0.00 0.00 1,100.00 0.00 1,100.00 417000 Accounting Fees 1,270.00 3,000.00 1,600.00 1,000.00 175.50 2,850.00 9,895.50 635100 1,028.00 10,923.50 417100 Audit Fees 1,200.00 2,000.00 635000 200.00 900.00 0.00 2,800.00 7,100.00 635000 3,950.00 11,050.00 635100 0.00 419000 Sundry - Admin 0.00 22,000.00 0.00 0.00 0.00 22,000.00 0.00 22,000.00 621000 419008 Advertising 4,626.00 0.00 0.00 0.00 0.00 0.00 4,626.00 621000 621.85 5,247.85 632000 6,358.00 6,358.00 632000 Management Fee 0.00 0.00 419011 Publications 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 419012 Membership dues and fees 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 636000 419013 Telephone 0.00 0.00 636000 0.00 0.00 0.00 0.00 0.00 1,598.12 1,598.12 419014 Rental of Office Space 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 631100 0.00 419017 Forms and Office Supplies 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 419018 Other Sundry Expenses 760.00 0.00 0.00 0.00 0.00 0.00 760.00 0.00 760.00 419019 Tenant Screening 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 440000 Maintenance and Operation 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 602300 Conventions and Meetings 606.00 0.00 0.00 0.00 0.00 0.00 606.00 0.00 606.00

505000 011 0 11 5	202.00			2.22	2.22		202.00			200.00
625000 Other Renting Expenses	290.00	0.00	0.00	0.00	0.00	0.00	290.00		0.00	290.00
635140 Tech Training	0.00	0.00	0.00	0.00	0.00	0.00	0.00	507000	0.00	0.00
637000 Bad Debt Expenses	0.00	0.00	0.00	0.00	0.00	0.00	0.00	637000	227.54	227.54
639000 Misc Admin Expenses	22,600.00	0.00	1,000.00	2,000.00	0.00	0.00	25,600.00	639000	1,044.73	26,644.73
			0.00	0.00	0.00	8,000.00	8,000.00		0.00	8,000.00
Total Administrative Expenses	90,552.00	115,500.00	11,726.00	24,136.00	198.50	65,034.00	307,146.50		14,918.24	322,064.74
Rent for Leased Dwellings						350,000.00				
Tenant Services Training	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00
Resident Participation	0.00	1,500.00	0.00	0.00	0.00	0.00	1,500.00			1,500.00
Total Tenant Services Expenses	0.00	1,500.00	0.00	0.00	0.00	0.00	1,500.00			1,500.00
							0.00			
Water	1,856.00	4,000.00	100.00	0.00	0.00	0.00	5,956.00	645100	3,777.05	9,733.05
Electricity	16,780.00	25,000.00	700.00	0.00	0.00	0.00	42,480.00	645000	17,055.31	59,535.31
Gas	15,360.00	23,000.00	0.00	0.00	0.00	0.00	38,360.00		0.00	38,360.00
Sewer	887.00	0.00	0.00	0.00	0.00	0.00	887.00		0.00	887.00
Cable	0.00	0.00	0.00	0.00	0.00	0.00	0.00	646400	8,024.75	8,024.75
Other Utility Expenses	0.00	700.00	0.00	0.00	0.00	0.00	700.00		0.00	700.00
Total Utility Expenses	34,883.00	52,700.00	800.00	0.00	0.00	0.00	88,383.00		28,857.11	117,240.11
441000 Maintenance Labor	45,730.00	86,000.00	7,078.00	19,081.00	0.00	0.00	157,889.00		0.00	157,889.00
441045 Employee Benefits - Maint	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
441050 Accrued Absenses Maint	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
442000 Materials	12,000.00	20,000.00	1,500.00	0.00	0.00	0.00	33,500.00		0.00	33,500.00
443000 Contract Costs	0.00	75,000.00	4,000.00	0.00	0.00	815.00	79,000.00		0.00	79,815.00
443100 Garbage	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443200 Heating and Cooling	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443500 Grounds and Landscape	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443600 Unit Turnaround Contract Costs	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443700 Electrical Contract Costs	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443800 Plumbing Contract Costs	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
443900 Exterminating	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
651000 Maintenance Payroll	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
651067 Employee Benefits Maint	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
651500 Building Maintenance Supplies	0.00	0.00	0.00	0.00	0.00	0.00	0.00	651500	5,008.54	5,008.54
651700 Janitorial	0.00	0.00	0.00	0.00	0.00	0.00	0.00	651700	2,030.67	2,030.67
651900 Extermination Contract	0.00	0.00	0.00	0.00	0.00	0.00	0.00	651900	1,908.95	1,908.95
652000 Contracts	23,900.00	0.00	0.00	0.00	0.00	0.00	23,900.00		0.00	23,900.00
652011 Contract Mowing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	652011	375.00	375.00
652012 Contract Lawn Fert		0.00						652012	805.55	805.55
652013 Sprinkler System Contract	0.00	0.00	0.00	0.00	0.00	0.00	0.00	652013	925.80	925.80
652040 Contract Plumbing	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
652060 Contract Fire Safety Services	0.00	0.00	0.00	0.00	0.00	0.00	0.00	652060	325.00	325.00
652080 Unit Turnaround	0.00	0.00	0.00	0.00	0.00	0.00	0.00	652080	1,956.84	1,956.84
652500 Garbage Removal	2,500.00	0.00	0.00	0.00	0.00	0.00	2,500.00	652500	650.00	3,150.00
653700 Grounds Contract	0.00	0.00	0.00	0.00	0.00	0.00	0.00	653700	1,800.00	1,800.00
654100 Repairs - Supplies and Materials	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
654200 Repairs Contract	0.00	0.00	0.00	0.00	0.00	0.00	0.00	654200	6,380.80	6,380.80
654600 Heating and Cooling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	654600	1,825.30	1,825.30
657000 Vehicle and Maint Equip Repair	3,250.00	0.00	0.00	0.00	0.00	1,150.00	3,250.00		0.00	4,400.00
659000 Misc Maintenance	18,000.00	0.00	0.00	0.00	0.00	0.00	18,000.00	659000	88.25	18,088.25
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Total Maintenance Expenses	105,380.00	181,000.00	12,578.00	19,081.00	0.00	1,965.00	318,039.00		24,080.70	342,119.70
660000 Depreciation Expense	0.00	0.00	0.00	0.00	0.00	0.00	0.00	660000	18,170.44	
Total Depreciation Expense	0.00	0.00	0.00	0.00	0.00	0.00	0.00		18,170.44	18,170.44
451000 Insurance Property	10,600.00	33,000.00	10,000.00	0.00	0.00	0.00	53,600.00		0.00	53,600.00
451100 Insurance Liability	0.00	0.00	0.00	2,500.00	0.00	6,000.00	2,500.00		0.00	8,500.00
451200 Insurance W/C	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
451300 Insurance Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
454000 Employee Benefits Contributions Admin	60,000.00	30,000.00	1,600.00	0.00	0.00	0.00	91,600.00		0.00	91,600.00
454041 Employee Benefits Contributins Admin	0.00	0.00	0.00	7,500.00	0.00	15,000.00			0.00	22,500.00
454044 Employee Benefits Contributions Maint	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
457000 Collection Losses	0.00	5,000.00	0.00	0.00	0.00	0.00	5,000.00		0.00	5,000.00
458000 Interest Admin / Sundry Notes	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
459000 Other General Expenses	0.00	3,000.00	0.00	0.00	0.00	0.00	3,000.00		0.00	3,000.00
672000 Property and Liability Ins	0.00	0.00	0.00	0.00	0.00	0.00	0.00	672000	4,578.00	4,578.00
672100 Fidelity Bond Insurance	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
672200 Workers Comp Insurance	5,900.00	0.00	0.00	0.00	0.00	0.00	5,900.00		0.00	5,900.00
679000 Insurance Other	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
690000 Service Coordinator Contract								690000	3,594.62	3,594.62
Total General Expenses	76,500.00	71,000.00	11,600.00	10,000.00	0.00	21,000.00	190,100.00		8,172.62	198,272.62
Total Routine Expenses	307,315.00	421,700.00	36,704.00	53,217.00	198.50	87,999.00	819,134.50		94,199.11	913,333.61
468000 Special Items - Net gains / losses	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	
Portable Hap						100,000.00				
Total NonRoutine Expenses	0.00	0.00	0.00	0.00	0.00	100,000.00	0.00		0.00	0.00
692003 Casualty Loss Contract	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	
692004 Casualty Loss Proceeds	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	
032004 Casualty E033 Frocecas	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	
Total Non Routine Expenses		0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
Total Expenses	307,315.00	421,700.00	36,704.00	53,217.00	198.50	537,999.00	1,357,133.50		94,199.11	1,451,332.61
Total Income	307,839.00	303,870.00	50,400.00	51,000.00	0.00	569,000.00	1,282,109.00		82,870.16	1,364,979.16
Op subsidity		110,000.00								
Income Less Expenses	524.00	(7,830.00)	13,696.00	(2,217.00)	(198.50)	31,001.00	34,975.50	((11,328.95)	23,646.55
Income Plus Depreciation	524.00	(7,830.00)	13,696.00	(2,217.00)	(198.50)	31,001.00	34,975.50		6,841.49	



HOUSING AUTHORITY OF THE CITY OF LEXINGTON ANTI-FRAUD POLICY

Adopted by Resolution No. 500 February, 2008

Introduction

The Board of Commissioners of the Housing Authority of the City of Lexington, Nebraska, has established an anti-fraud policy to enforce controls and to aid the prevention and detection of fraud, theft, waste, or abuse against the Agency. This policy applies to any fraud, theft, waste, or abuse or suspected fraud, theft, waste, or abuse involving any employee (including management), consultant, vendor, contractor, or outside agency doing business with the Agency or in any other relationship with the Agency. This policy is supported and supplemented by a variety of existing policies and procedures including the Personnel Policy, Ethics Policy, Consolidated Annual Contributions Contract(s), Lindsey Software, EIV, Administrative Plans and various accounting and reporting procedures. These policies and procedures further communicate the culture of honesty that is demanded by the Board of Commissioners and provide a framework to support compliance with this policy.

The Board of Commissioners does not tolerate any type of fraud, waste or abuse. The Agency's policy is to promote consistent, legal and ethical organizational behavior by:

- Assigning responsibility for reporting fraud, theft or abuse;
- Providing guidelines to conduct investigations of suspected fraudulent behavior;
 and
- Requiring each employee to attend annual fraud awareness training.

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Failure to comply with this policy subjects an employee (including management) to disciplinary action, including immediate termination. Failure to comply by a consultant, vendor, contractor, outside agency, or person doing business with the Agency or in any other relationship with the Agency could result in cancellation of the business or other relationship between the entity and the Agency.

The Board of Commissioners will pursue prosecution if the results of an investigation indicate the possibility of criminal activity.

For purposes of this policy only the term *fraud or fraudulent* includes theft, waste, and abuse as defined below. The term *employee* includes employees in management positions. The term management includes, Commissioners, Executive Director, administrative personnel, supervisors and any other employee who receives compensation in the form of a salary (refer to FLSA).

Creating a Culture of Honest and High Ethics



The Housing Authority of the City of Lexington has a culture of honesty, integrity and high ethics.

Contributing to this are:

- A commitment from the Board of Commissioners to tolerate only the highest levels of honesty, integrity and ethics.
- A positive workplace environment supported by adequate compensation, benefits and protections.
- Hiring the best qualified persons and promoting existing employees based on merit
- Making adequate training opportunities available.
- Issuing discipline in a fair and consistent manner.

The cornerstone of an effective anti-fraud environment is a culture with a strong value system founded in integrity. The value system is reflected in a code of ethics. Each employee shall be provided a copy of the Ethics Policy and each employee is required to attend at least one session of ethics awareness training each fiscal year. After attending the training, the employee must sign a form indicating that they have attended the training and understood its content.

Definitions and Examples of Fraud, Waste, and Abuse

Fraud is defined as an intentional deception designated to obtain a benefit or advantage or to cause some benefit that is due to be denied. Examples of fraud include:

- Forgery or alteration of a check, bank draft, or any other financial document;
- Theft of a check or other diversion of a client payment;
- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of Agency operations; and
- An employee with access to confidential client information who sells this information or uses it in the conduct of an outside business activity.

Waste is the loss or misuse of Agency resources that results from deficient practices, system controls, or decisions. An example is purposely not taking advantage of early bird conference registration discounts.

Abuse is the intentional, wrongful, or improper use of resources or misuse of rank, position, or authority that causes the loss or misuse of resources such as tools, vehicles, computers, copy machines, etc. Examples of abuse include:

- Using Agency equipment or supplies to conduct personal business; and
- An employee using non-confidential client information to get new customers for his/her outside business.

Theft is defined as the act of taking something from someone unlawfully. An example of theft is taking home a printer belonging to the Agency and keeping it for personal use.



Responsibility to Report Suspected Fraud

Each employee is required to report any suspected fraud, theft, waste, or abuse or other dishonest conduct to the Executive Director.

Management is required to report suspected fraud, theft, waste, or abuse or other dishonest conduct including reports from employees or other individuals to the Board Chair or Vice Chair person.

Each employee is required to report any suspected fraud, theft, waste, or abuse or other dishonest conduct of the Executive Director to the Board Chair or Vice Chair person.

Each employee is required to report any suspected fraud, theft, waste, or abuse or other dishonest conduct of the Board Chairperson or any Commissioner to the Mayor of the City of Lexington, Nebraska.

The Executive Director has the authority to determine the merits of a report of suspected fraud including obtaining, if necessary, the assistance of the Agency's Attorney.

The identity of an employee or complainant who reports suspected fraud will be protected to the full extent allowed by law.

Suspected improprieties and/or misconduct concerning an employee's ethical conduct should be reported in the same manner and to the same reporting entity as fraud, theft, waste, or abuse or other dishonest conduct. Note that there are many instances of prohibited actions that do not rise to the level of fraud, such as an improper relationship with a vendor.

Guidelines for Handling a Report of Suspected Fraud, Theft, Waste, or Abuse

Whether the initial report is made to the Executive Director, Board Chair or Vice Chair person or Mayor, the reporting individual should receive the following instructions and information:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Allow the investigative body to conduct the investigation. Do not further investigate the allegations.
- Observe strict confidentiality. Do not discuss the case, facts, suspicions, or allegations with anyone else unless specifically asked to do so by the investigative body, police, Agency Attorney, or the Office of the Inspector General.
- Retaliation will not be tolerated. The Agency will not tolerate any form of retaliation against individuals providing information concerning fraud or suspected fraud.
- Every effort will be made to protect the rights and the reputations of everyone involved including the individual who in good faith alleges perceived misconduct



- as well as the alleged violator(s). (See: *Disciplinary Action* for the consequences of making a report of fraud in bad faith.)
- The identity of an employee or other individual who reports a suspected act of fraud will be protected as provided by this policy. (See: *Responsibility to Report Suspected Fraud.*)

Responsibility of the Executive Director

The Executive Director, in consultation with the Fee Accountant, HUD and Fiscal Auditor, shall evaluate the risks of fraud and implement processes, procedures and controls to mitigate those risks. Neither fraudulent financial reporting nor misappropriation of assets can occur without a perceived opportunity to commit and conceal the act. The Executive Director will be proactive in reducing fraud opportunities by:

- Identifying and measuring fraud risks;
- Taking steps to mitigate identified risks; and
- Implementing and monitoring appropriate preventative and detective internal controls and other deterrent measures.

The Executive Director shall serve as the primary Ethics Officer for the Agency. On receiving a report of fraud, the Executive Director shall document the contact and conduct a preliminary investigation to determine the credibility of the report. If the report is credible, the Executive Director shall follow the investigation guidelines provided in this policy. (See: *Guidelines for the Investigation of Suspected Fraud.*)

The Executive Director shall make every effort to protect the rights and the reputations of everyone involved in the report of suspected fraud, including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s). The Executive Director also shall make every effort to protect the identity of a person who in good faith reported the suspected fraud. However, disciplinary action may be taken as provided by this policy if a report is made in bad faith. (See: *Disciplinary Action*.)

The Executive Director may find it necessary to involve outside agencies to assist the investigation and may refer questions as to whether the action constitutes fraud to the Agency's Fee Accountant, Auditor or Attorney, as appropriate.

On determining that a report is not credible or is not a report of fraud, the Executive Director shall document this determination. The Executive Director's documentation shall include support for the determination. The determination shall be filed in the office of the Agency's Attorney.

The Executive Director is responsible for the administration, interpretation, and application of this policy. The Board of Commissioners is responsible for policy adoptions and revisions

Guidelines for the Investigation of Suspected Fraud



The Executive Director is responsible for the investigation of reported wrongdoing and all suspected fraud and for coordinating investigative activities. Each employee involved in an investigation of suspected fraud shall keep the content of the investigation strictly confidential to the full extent provided by law. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know.

Any required investigative activity shall be conducted without regard to the suspected wrongdoer's length of service, position/title, relationship to the Agency, or any other perceived mitigating circumstance.

The Executive Director shall maintain appropriate documentation regarding incidents of fraud.

The Executive Director shall develop and maintain guidelines for access to and security of this documentation, until a determination is filed at the office of the Attorney.

If an investigation substantiates fraudulent activities, the Executive Director will prepare an incident report to the Board of Commissioners. The Executive Director shall prepare the report as soon as possible after the fraud is confirmed and shall document the content of the investigation, the findings, and any disciplinary action taken as a result of the finding.

If an investigation substantiates fraudulent activities of a possible criminal nature, the Executive Director shall determine, in consultation with the Board of Commissioners, HUD, Agency's Attorney and/or the Office of the Attorney General, whether to refer the matter to law enforcement and/or at what level.

Any inquiries from the suspected individual, his or her attorney/representative, or any other inquirer shall be directed to the Executive Director. If necessary, the Executive Director will refer these inquiries to the Agency's Attorney.

The Board Chairperson is responsible for the investigation of any reported wrongdoing by the Executive Director. The Board Chairperson shall follow the same procedures that have been established for the Executive Director to follow when investigating and addressing possible wrongdoing. The Board Chairperson shall advise the other members of the Board of Commissioners about the allegations and provide them with periodic updates on the status of the investigation. The Board Chairperson may also choose to appoint one or more Commissioners to assist with the investigation. Each Commissioner is bound by the same requirements for strict confidentiality.

Any reported wrongdoing by a member(s) of the Board of Commissioners shall be investigated by the Mayor in accordance with the policies of the City of Lexington, Nebraska.

Disciplinary Action



Failure to comply with any part of this policy is grounds for disciplinary action, including immediate termination.

An employee who:

- Has engaged in any form of fraud, waste, or abuse;
- Suspects or discovers fraudulent activity and fails to report his or her suspicions as required by this policy (See: Responsibility to Report Suspected Fraud); or
- Intentionally reports false or misleading information.

Any losses from fraud will be recovered, if necessary through civil action.

Client Fraud within the Assisted Housing Programs

The Agency has developed very specific procedures and guidelines for dealing with fraud by clients of its assisted housing programs. These standards are contained in the *Admissions and Continued Occupancy Policy* for the Public Housing Program and *Section 8 Administrative Plan* for the Housing Choice Voucher Program. The Agency will take one or more of the following actions whenever it reaches a positive determination:

- Enter into a repayment agreement;
- Terminate assistance (Housing Choice Voucher Program);
- Terminate tenancy and evict (Public housing Program);
- Seek recovery of any excess subsidies including through the civil courts; and/or
- Refer the matter to the Office of the Inspector General.

Fraud Awareness Training

Each employee is required to attend at least one session of Fraud Awareness Training each fiscal year. After attending the training, the employee must sign a form indicating that they have attended the training and understood its content.

Annual Report

Incidents of suspected fraud determined by the Executive Director to have merit shall be reported to the Board of Commissioners on an annual basis. The annual report shall include: whether the report was from an employee; the determination of merit; whether a full investigation was conducted and if so, the results of the investigation; the disciplinary action, if any resulting from the investigation; whether the report was referred to an outside entity and if so, the current status or final results of the referral

HOUSING AUTHORITY OF THE CITY OF LEXINGTON



609 East 3rd Street Lexington, NE 68850

(308) 324-4633 (308) 324-4360 FAX

Ethics Policy

Adopted by Board Resolution No. 493 /September 12, 2007

The Lexington Housing Authority finds that the proper conduct of its operations requires that its commissioners and employees be independent, impartial and responsible to clients and stakeholders; that its decisions and policies be made in accordance with all laws and regulations; that Board of Commissioners and staff positions not be used for personal gain; and that the public should have confidence in the integrity of its officers, staff and operations.

Accordingly, it is the purpose of this Ethics Policy to establish ethical standards of conduct for all officers and employees of the Lexington Housing Authority, to set forth those acts that are incompatible with this policy; to require disclosure by such officers and employees of private financial or other interests in matters affecting the Lexington Housing Authority; and to provide an effective means for enforcement. (See Section 78 through 87 of the Nebraska Housing Agency Act as attached, to be used as an example of lawful action)

Lexington Housing Authority's Mission Statement

The mission of the Lexington Housing Authority is to be the area's affordable housing of choice. We provide and maintain safe, quality housing in a cost-effective manner. By partnering with others, we offer rental assistance and other related services to our community in a non-discriminatory manner.

Lexington Housing Authority Statement of Values

As stewards of the public trust, we pursue our mission and responsibilities in a spirit of service, teamwork, and respect. We embrace the values of excellence, collaboration, innovation, appreciation, integrity, fairness and citizenship.

Code of Conduct

The Lexington Housing Authority believes that the proper operations of a municipal corporation exercising public and essential government functions requires the highest standards of ethical conduct by its commissioners and employees. Accordingly, all commissioners and employees are expected to maintain the highest standards of personal integrity and fairness in carrying out their public duties, avoid any improprieties in their role as public servants, and never use their position or power for improper personal gain.

Each commissioner and employee must recognize that the Lexington Housing Authority's principal responsibilities are to serve our customers, the community, and to protect the public



general public by performing our functions within the law, and by ensuring that we conduct our duties ethically and with proper regard for the rights of others. We observe the principles of truth, accuracy and prudence without allowing personal feelings, prejudices, animosities, or friendships to influence our judgments.

We treat all residents, co-commissioners and co-workers and customers with respect and dignity, and we have special stewardship responsibilities in dealing with those we serve, especially those who are vulnerable.

Our obligation as a public entity requires that all Lexington Housing Authority commissioners and employees:

- 1. Be independent and impartial in the exercise of their duties, avoiding actions that create even the appearance of using their positions for personal gain or private benefit;
- 2. Strengthen public confidence in the integrity of the Lexington Housing Authority by demonstrating the highest standards of personal integrity, fairness, and compliance with both the spirit and letter of the law;
- 3. Create and maintain a work environment that is free from all forms of unlawful discrimination and harassment;
- 4. Manage human and environmental resources for the benefit and enjoyment of both current and future generations;
- 5. Serve the public with respect, concern, courtesy and responsiveness, recognizing that service to the public is key to the Lexington Housing Authority's mission;
- 6. Promote an environment of public trust free from fraud, abuse of authority, and misuse of property;
- 7. Protect the integrity of the decision-making process by recognizing and avoiding conflicts between public duties and private interests and activities; and
- 8. Respect and protect confidential information to which commissioners and employees have access in the course of their official duties.

I have read		J	J	,	Code	of	Conduct,	and	I	understand	the
expectations	that tl	ne Agency h	nas for me) .							
Signed:					Date): _					

Print Name:





Lexington Housing Authority Standards of Ethics and Conduct Pledge

As an appointee / employee / contract employee / consultant (please circle one) of Lexington Housing Authority
I,, hereby pledge that I will abide by these Standards of Ethics and Conduct, as adopted by the Lexington Housing Authority Board on September 12, 2007.
1. A public official or employee shall not divulge to any unauthorized person confidential information acquired in the course of employment in advance of the time prescribed for its authorized release to the public.
2. A public official or employee shall not represent his personal opinion as that of his board or commission.
3. A public official or employee shall use personnel resources, property and funds under his official care and control solely in accordance with prescribed constitutional, statutory, and regulatory procedures and not for personal gain or benefit.
4. A public official or employee shall not, directly or indirectly, solicit or accept any gift or loan of money, goods, services or other thing of value for the benefit of any person or organization, other than Lexington Housing Authority, that tends to influence the manner in which the public official or employee or any other public official or employee performs his official duties.
5. A public official or employee shall not engage in a business transaction in which he may profit from his official position or authority or benefit financially from confidential information he had obtained or may obtain by reason of such position or authority.
6. A public official or employee shall not engage in or accept employment or render services for any private or public interest when that employment or service is incompatible or in conflict with the discharge of his official duties or when that employment may tend to impair his independence of judgment or action in the performance of his official duties.
7. A public official or employee shall not participate in the negotiation or execution of contracts, making of loans, granting of subsidies, fixing of rates, issuance of permits or certificates or other regulation or supervision relating to any business entity in which he has directly or indirectly a financial or personal interest.
Further, I agree to conduct myself so as to avoid even the appearance of impropriety. I hereby agree to these Standards and will conduct myself accordingly
(Signature)
(Print name on this line)



Laws 1999, LB 105, § 77.

71-15,149

Conflict of interest; terms, defined. For purposes of sections 71-15,149 to 71-15,157:

(1) Housing agency official means any representative of a housing agency or any director, officer, or employee of a resident management corporation or other resident organization who exercises authority or carries out responsibilities in

connection with the housing agency's developments or any local government official who exercises authority or carries out responsibilities in connection with the housing agency's developments, including any member of such person's immediate family, any business entity or organization in which such person holds an interest, and any business partner of such person; and (2) Immediate family includes spouses, children, siblings, and parents and includes stepparents or stepchildren, in-laws, and half sisters or half brothers.

Source:

Laws 1999, LB 105, § 78.

71-15,150

Conflict of interest; prohibited acts.

- (1) Except as otherwise permitted under the provisions of sections 71-15,149 to 71-15,157, no housing agency official shall own or hold an interest in any contract or property or engage in any business, transaction, or professional or personal activity that would:
- (a) Be or appear to be in conflict with such official's duties relating to the housing agency served by or subject to the authority of such official;
- (b) Secure or appear to secure unwarranted privileges or advantages for such official or others; or
- (c) Prejudice or appear to prejudice such official's independence of judgment in the exercise of his or her official duties relating to the housing agency served by or subject to the authority of such official.
- (2) No housing agency official shall act in an official capacity in any matter in which such official has a direct or indirect financial or personal involvement. The ownership of less than five percent of the outstanding shares of a corporation shall not constitute an interest within the meaning of this section. No housing agency official shall use his or her public office or employment to secure financial gain to such official.
- (3) Except as otherwise permitted by the provisions of sections 71-15,149 to 71-15,157, a housing agency shall not, with

respect to any housing agency official, during his or her tenure or for a period of one year thereafter, either:

- (a) Award or agree to award any contract to such housing agency official or other local government official;
- (b) Purchase or agree to purchase any real property from such housing agency official or other local government official, or sell or agree to sell any real property to such

housing agency official or other local government official;

- (c) Permit any housing agency official to represent, appear, or negotiate on behalf of any other party before the housing agency's board of commissioners or with its other officials or employees;
- (d) Employ any commissioner for compensation or otherwise;
- (e) Employ any local government official, or any member of such official's immediate family, if such official's duties involve the exercise of authority relating to the housing agency; or
- (f) Employ for compensation any member of the immediate family of a housing agency official, if such employment creates the relationship of direct supervisor or subordinate between family members or otherwise creates a real or apparent conflict of interest.

Source:

Laws 1999, LB 105, § 79.

71-15,151

Conflict of interest; disclosure required; when.

If (1) a housing agency official becomes involved in an activity or, through inheritance or other involuntary cause or circumstance, acquires an interest that violates any provision of sections 71-15,149 to 71-15,157 or (2) a local government official, after becoming employed by the agency, is requested to act in an official capacity with respect to a matter affecting his or her duties as an employee of the local housing agency, such housing agency or local government official shall immediately and fully disclose in writing to the housing agency's board of commissioners the circumstances giving rise to the conflict of interest. In the case of a local government official, such disclosure shall also be made to the local government served by such official. Upon receipt of any disclosure of actual or potential conflict of interest, a housing agency shall promptly cause such disclosure to be entered in the minutes of the housing agency.

Source:

Laws 1999, LB 105, § 80.

Housing agency official; recusal; when.

A housing agency official shall recuse himself or herself from any vote, decision, or other action and shall not directly or indirectly participate in any action or proceeding which involves an actual or potential conflict of interest as described in sections 71-15,149 to 71-15,157, including, but not limited to, any matter:

- (1) With respect to which disclosure is required under section 71-15,151;
- (2) Involving assistance to, the employment of, or otherwise relating to the personal status of a member of such housing agency official's immediate family;
- (3) In which the agency seeks to confer or bestow a special privilege or benefit upon such housing agency official;
- (4) Involving an action by the board of commissioners concerning a waiver of any provision of sections 71-15,149 to 71-15,157, which waiver would affect such housing agency official; or
- (5) Involving any other action or circumstance prohibited under sections 71-15,149 to 71-15,157 or which otherwise gives rise to a real or apparent conflict of interest. Source:

Laws 1999, LB 105, § 81.

71-15,153

Housing agency official; gifts; prohibited acts. A housing agency official shall not solicit

or accept any gift, gratuity, favor, loan, contribution, service, employment, promise of future employment, or other thing of value from any present or prospective employee of the housing agency, any present or prospective contractor, subcontractor, developer, broker, real estate agent, or any other person or organization in connection with the programs, benefits, or business of the housing agency. This section shall not prohibit the acceptance of gifts from relatives or gifts of nominal value which are not given with the intent to influence a housing agency official in the conduct of his or her official duties. Housing agencies may establish standards for determining whether or not a gift is of nominal value.

Source:

Laws 1999, LB 105, § 82.

71-15,154

Housing agency official; improper use of information.

No housing agency official shall use any

information not generally available to the public which he or she acquires in the course of his or her public service for the purpose of securing financial gain for such official or others. Source:

Laws 1999, LB 105, § 83.

71-15,155

Misconduct in office.

Material violation of any provision of sections 71-15,149 to 71-15,157 by a housing agency official shall, unless as otherwise provided in section 71-15,157, constitute misconduct in office.

Source:

Laws 1999, LB 105, § 84.

71-15,156

Conflict of interest; rules authorized.

A local housing agency may adopt rules

implementing sections 71-15,149 to 71-15,157. Such rules may include the provision for such disciplinary actions in the event of violation of sections 71-15,149 to 71-15,157 as the housing agency's board of commissioners may deem appropriate.

Source:

Laws 1999, LB 105, § 85.

71-15,157

Conflict of interest; sections; how construed.

- (1) Nothing contained in sections 71-15,149
- to 71-15,157 shall prohibit a housing agency of a city of the second class or of a village from purchasing or otherwise acquiring any goods or services from a provider of such goods or services owned in whole or in part by a housing agency official if (a) the provider is the sole source for the goods or services within the area of operation of the housing agency, (b) the cost of the goods or services does not exceed five hundred dollars in any one instance, and (c) the provider has not received more than two thousand five hundred dollars from the housing agency in any one calendar year.
- (2) Nothing contained in sections 71-15,149 to 71-15,157 shall prohibit a housing agency from entering into and performing contracts, agreements, and arrangements with any nonprofit entity or any affiliate, whether for-profit or nonprofit in character, notwithstanding that some or all of the housing agency's representatives or public officials or legislators who exercise functions or responsibilities with respect to a housing agency's developments also serve as directors or in other policymaking positions in such nonprofit entity or affiliate. Such service by housing agency

representatives, public officials, or legislators is expressly permitted under the Nebraska Housing Agency Act.

- (3) The provisions of sections 71-15,149 to 71-15,157 shall not apply to any general depositary agreement entered into with a bank or other financial institution regulated by the federal government or to utility service for which rates are fixed by a state or local agency. The provisions of sections 71-15,149 to 71-15,157 shall not apply to prohibit any present or former tenant commissioner from acting upon housing agency business affecting residents unless such business directly involves a resident organization with respect to which such commissioner occupies a policymaking position or serves as a member of the governing board.
- (4) Nothing contained in sections 71-15,149 to
- 71-15,157 shall prohibit service as a commissioner by the chief elected official or any member of the governing body of any city, county, or other public agency which is served by a housing agency.

Source:

Laws 1999, LB 105, § 86.

71-15.158

Property and personnel; policies, rules, and procedures; bidding requirements.

- (1) Local housing agencies shall adopt policies, rules, and procedures governing the procurement of goods or services, the sale or disposition of agency property, and the management of agency personnel. Such policies, rules, and procedures shall apply to all controlled affiliates of a local housing agency unless the agency, by resolution of its board of commissioners, elects otherwise.
- (2) To the extent that federal funds are involved in any procurement by a local housing agency and public bidding or other procedures and conditions are required as a condition of

the acceptance of federal financial assistance, a local housing agency shall follow such federal procedures and other conditions in such procurement.

- (3) Contracts or awards for housing developments which the local housing agency proposes to construct or cause to be constructed, if the estimated cost is fifty thousand dollars or more, shall be entered into or awarded only after public bidding as provided in this section. This section shall not apply to the procurement of any professional services such as that of an architect, engineer, or legal counsel.
- (4) For the construction of new housing developments, the local housing agency, in its discretion, may publish a

request for proposals, including a general plan for the purposes and ends to be accomplished by the new development, including, but not limited to, the total number of units desired, any units that are to be specifically designed for the elderly or the handicapped, the unit size, and any other details which the local housing agency deems appropriate for inclusion within the proposed new development or any facilities that are pertinent thereto.

- (5) The local housing agency shall advertise for public bids or proposals once a week for two consecutive weeks in a newspaper of general circulation in its area of operation. After sealed bids or proposals are received, the contract shall be awarded to the lowest and best bidder or, if the local housing agency has elected to proceed under subsection (4) of this section, in favor of the proposal that is most commensurate with the published objectives of the local housing agency and is most suitable for the purposes of the Nebraska Housing Agency Act, except that a local housing agency, if it deems it to be in its best interests or necessary or desirable to effectuate the purposes of the act or economy and efficiency in the construction and operation of such housing development, may either reject all bids or proposals and readvertise or elect not to proceed with the development.
- (6) The local housing agency may adopt and promulgate rules and regulations governing the qualifications of bidders, the submission of combined bids by two or more contractors, the award and execution of the contract, security, if any, the execution and performance of the contract, the requirements for making a proposal, and any other matters which the local housing agency deems appropriate.
- (7) The local housing agency may, in its discretion, insert a provision in any contract that additional work may be done or materials or supplies furnished or that work or materials may be omitted for the purpose of completing the contract in

accordance with any changes, omissions, or additions in the specifications of any such contract. Nothing in this section shall be construed to limit the power of the local housing agency to carry out a project or development or any part thereof directly by the officers, agencies, and employees of the agency or by any public agency or to purchase or to acquire goods, services, materials, equipment, or property by or through any other local housing

agency as provided in section 71-15,160 or by any other public agency provided in section 71-15,161. The local housing agency may, in its discretion, insert a provision in any contract regarding labor, including wage rates, safety, and equal employment opportunities, that the local housing agency deems necessary or desirable or as may be required by law.