



## **REGULAR BOARD MEETING**

**July 28, 2021**

6:00 p.m.

Zoom Conference

### **AGENDA**

1. Approve Minutes of the COC Board Meeting of June 23, 2021
2. Public Comment
3. Board Committee Reports
  - HR Committee Meeting
  - Operations Committee Meeting
  - Finance Committee Meeting
4. Report from Executive Director
5. Resolutions:
  - 21-20 Authorize Change Order No. 4 to contract with FireTech for Added Funding and Contract Extension for Inspection and Testing of the Fire Alarm
  - 21-21 Intent to Issue Multifamily Housing Revenue Notes Not Exceeding \$10,500,000 for Lawnhill Terrace 4 and to Reimburse Expenses Associated with the Issuance
6. Executive Session
  - Legal Matters, Real Estate Items, Personnel Items

**Agenda**

**Finance Committee Meeting**

**July 27, 2021**

**5:30 p.m.**

1. Overview of the Financial System Conversion – Finance/IT Team
2. Board Policy Review (Investment Policy) - Lisa
3. Other Items

**Agenda**

**Human Resources Committee Meeting**

**July 27, 2021**

**4:15 p.m.**

1. Code of Ethics Policy Review – Chapter #106
2. Recruitment Update
3. Employee Recognition and Engagement

**Agenda**

**Operations Committee Meeting**

**July 28, 2021**

**5:15 PM**

1. Rent Relief Programs
2. June Accounts Receivable Status
3. Covid-19 Vaccinations
4. Security Update
5. Rippowam Manor Management Occupancy Review (MOR)
6. Emergency Housing Vouchers
7. Procurement Activity
  - a. RFP- Specialized Legal Services

**HOUSING AUTHORITY OF THE CITY OF STAMFORD  
D/B/A CHARTER OAK COMMUNITIES**

22 Clinton Avenue  
Stamford, Connecticut 06901

**Board Meeting Date: July 28, 2021**

**Resolution Number: 21-20**

**RESOLUTION**

**Subject: Authorize Change Order No. 4 to Contract with FireTech for Added Funding and Contract Extension for Inspection and Testing of the Fire Alarm**

**Background:** The contract for the Inspection and Testing of the Charter Oak Communities' Fire Alarm Systems was awarded to the firm, FireTech, pursuant to RFP No. 15-0020 and is a "piggyback" contract with the State of Connecticut Department of Administrative Services No. 14PSX0023 and was signed on September 30, 2015. The prior authorized funding of \$155,000.00 for the previously contracted work has been fully expended. Total current expenditures are \$185,860.00

COC recommends the authorization of an additional \$60,860.00 for the associated services through to the completion of the contract. The revised total proposed contract amount under this agreement shall not exceed \$215,860.00. Additionally, it is being recommended to extend the term of the contract to coincide with the State of CT DAS contract for additional time.

**Resolution: Be it resolved by the Commissioners of the Housing Authority of the City of Stamford d/b/a Charter Oak Communities, that the Executive Director is authorized to execute Change Order No. 4 for additional funding with FireTech, Inc. for the amount of \$60,860.00, raising the total not to exceed contract to \$215,860.00 and to extend the contract term. Further expenditure shall not be exceeded without Board authorization.**

**Peter Stothart**  
**Staff Member**

**HOUSING AUTHORITY OF THE CITY OF STAMFORD  
D/B/A CHARTER OAK COMMUNITIES  
22 CLINTON AVENUE  
STAMFORD, CT 06901**

**Board Meeting Date:** July 28, 2021

**Resolution Number:** 21-21

**RESOLUTION**

**Subject:** Intent to Issue Multifamily Housing Revenue Notes Not Exceeding \$10,500,000 for Lawnhill Terrace 4, and to Reimburse Expenses Associated with the Issuance

**Background:** See attached resolution prepared by bond counsel containing details of the proposed issuance by COC of tax-exempt bonds to partially fund the comprehensive renovation of Lawnhill Terrace 3. COC will incur no financial exposure or repayment obligation as a result of issuing the bonds, and COC will receive an issuance fee equal to 1% of the amount of the bond issue.

**Resolution:** Be it resolved by the commissioners of the Housing Authority of the City of Stamford that the resolution prepared by Bond Counsel authorizing issuance and sale of multifamily revenue housing notes not exceeding \$10,500,000 for Lawnhill Terrace 4 be approved and that the Executive Director or CEO of the Housing Authority of the City of Stamford be authorized to execute and implement the agreement.

**Jonathan Gottlieb  
Staff Member Submitting Report**

**HOUSING AUTHORITY OF THE CITY OF STAMFORD**

**RESOLUTION OF OFFICIAL INTENT TO REIMBURSE  
EXPENDITURES FROM THE PROCEEDS OF TAX-EXEMPT  
OBLIGATIONS FOR THE LAWNHILL TERRACE PHASE 4 PROJECT**

**WHEREAS**, the Housing Authority of the City of Stamford (the “Authority”) plans to undertake the planning, design, acquisition, demolition, rehabilitation, improvement, furnishing, and equipping of an estimated 34-unit multifamily residential rental housing project to be located on property currently known as 31-97 (odd numbers only) Custer Street, Stamford, Connecticut (the “Project”);

**WHEREAS**, the Authority plans to finance a portion of the cost of the Project with the proceeds of tax-exempt notes or other tax-exempt obligations or other obligations, authorized by subsequent resolution in an amount not to exceed \$10,500,000 (the “Notes”), issued pursuant to Chapter 128 of the General Statutes of Connecticut, Revision of 1958, as amended (the “Act”), and loan the proceeds of the Notes to an affiliated limited partnership or other entity to be known as Lawnhill Terrace Phase 4 Limited Partnership, or such other name as the Authority shall designate (the “Borrower”); and

**WHEREAS**, the Authority or the Borrower may incur expenditures for the Project prior to the issuance of the Notes.

**RESOLVED**, that the Authority hereby expresses its official intent pursuant to Section 1.150-2 of the Federal Income Tax Regulations, Title 26 (the “Regulations”), to reimburse expenditures paid sixty days prior to and any time after the date of adoption of this resolution in connection with the Project from the proceeds of the Notes in accordance with the Regulations. The Notes shall be issued to reimburse such expenditures not later than 18 months after the later of the date of the expenditure or the substantial completion of the Project, or such later date the Regulations may authorize. The Authority hereby certifies that its intention to reimburse as expressed herein is based upon its reasonable expectations as of this date. The Chief Executive Officer, Executive Director or either of their designees are hereby individually authorized to pay Project expenses, if any, in accordance herewith, pending the issuance of the Notes. This Resolution is adopted solely for purposes of compliance with the Regulations and may not be used or relied on for any other purpose.

**RESOLVED**, that this Resolution shall take effect immediately upon passage.

**SECRETARY'S CERTIFICATION**

This Resolution was adopted upon the vote of a majority of the Commissioners present, constituting a quorum, at a duly called meeting of the Authority on July 28, 2021.

By: \_\_\_\_\_

Vincent J. Tufo  
Secretary



## Policy Review with the Board of Commissioners (HR Committee)

**Name of Policy Reviewed:** Code of Ethics

**Date of Policy Issuance:** September 23, 2009

**Date of Policy Modification:** October 12, 2012

**Most Recent Date of Policy Review with Board & Staff:** May 25, 2021 & June 22, 2021

**Purpose:** The Board of Commissioners' fiduciary responsibility is to have oversight of policy and standards that ensure adequate internal controls. Clear policies help to measure activities, prevent fraud, ensure proper use of COC's resources and designated roles and responsibilities. As a best practice the Board will review key policies periodically.

**Intent:** Policies and procedures are living documents. While the core elements and the intent of the policy may remain the same, the details may need to adapt based on changes in the industry and organization. Outdated policies could potentially be a risk to the organization.

**Summary of Policy:** The Code of Ethics Policy outlines the ethical standards by which Charter Oak Communities and its affiliates are to conduct business. These standards are designed to assure the utmost in public trust, confidence and consistency in the policies and practices of COC. The Standards of Conduct contained within the Code of Ethics provide the framework for Commissioners, employees and external vendors.

The reference to "employee" below refers to the above stated individuals. The significant policies contained within the Code of Ethics are:

- Standards of Conduct shall be followed to avoid the appearance or actual occurrence of any favoritism or special treatment towards an applicant, resident, tenant, vendor or agent having business, or dealings of any kind, with COC.
- Employees cannot solicit or accept gifts, money, tickets or any item of service having value more than \$25.00 from any person who has an interest in any matter proposed or pending before COC.
- All vendors are expected to be governed by both COC's and their profession's own code of ethics. Any vendor found in material and willful violation shall be forbidden to conduct future business dealings with COC.
- Employees shall not engage in any business or commercial transactions that would fulfill their personal interests, gain any gift of value or conflict with the ethics ascribed to their professional duties.

- All contracts for goods and services must be awarded in accordance with the regulations outlined in the U.S. Department of Housing and Urban Development, applicable state law and COC's Procurement Policy.
- Employees shall not disclose to outside individuals or organizations any private, non-public information regarding any aspect of COC's operations without proper authorization.
- No single employee has the capacity to bind COC into any obligation, business proceedings or judicial procedures.
- Employees cannot be hired to serve or report to an employee to whom they are related; employees cannot participate in the decision-making regarding employment of or contract to any family member.
- Employees may not partake in any discussions, votes or decisions regarding any business transaction in which he/she has a material interest due to the potential for personal gain. Employees are obligated to disclose all such personal interests in writing. Prior to taking personnel, procurement or legal action, the matter would be submitted to the Ethics Review Committee for evaluation and judgement.
- The Board of Commissioners will establish an Ethics Review Committee to review decisions on any matters involving ethical conduct, or breach of ethical conduct, by employees or vendors.
- The Board of Commissioners oversees the policies governing the operations of COC. They are responsible for overseeing all legal and fiscal affairs.

**Review of data and recommendations (Staff and Board):**

**Policy Status Grid**



## PERSONNEL POLICY MANUAL Code of Ethics Policy – Chapter # 106

Charter Oak Communities (“COC”) has established standards of conduct for its Commissioners and employees, hereinafter referred to as “employees”. These standards are designed to assure the utmost in public trust and confidence in the policies and practices of COC. Because of its status as an independent public corporation, COC recognizes its responsibility to conduct all business in a manner above reproach or censure. This Code of Ethics will describe in detail the standards by which employees are to be held accountable.

- (1) This Code of Ethics recognizes and incorporates those sections of federal, state, and local law which govern the conduct of public employees, and in no way supplants those provisions of law. In cases where no statutory precedent exists, the policy of COC shall be applied, except that this policy shall in no way be taken to supersede the provisions of any contracts, labor agreements, or other external agreements affecting the rights and privileges of employees.
- (2) The Standards of Conduct contained within the Code of Ethics shall be generally applied so as to avoid the appearance, or actual occurrence of, any favoritism or special treatment towards any applicant, resident, tenant, vendor, or agent having business, or dealings of any kind, with COC. No employee shall use, or cause, or allow to be used, his or her position to secure any personal privileges for himself, herself, or others, including family members and friends, or to influence the activities, actions, or proceeds of COC in any manner or way, other than in the best interests of COC.
- (3) COC, in establishing standards of conduct for its employees, recognizes the importance of establishing standards of conduct for external vendors and suppliers of products and/or services to COC. While COC cannot mandate the internal conduct or policies of vendors, it nevertheless requires that vendors and suppliers adhere to certain basic principles in conducting business with COC. Specifically, these principles include:
  - a) No direct or indirect personal inducement of COC employees. This includes the giving of gifts, money, tickets or any item or service having value.
  - b) No direct or indirect inducement of members of the Board of Commissioners. This shall include the same provisions covering employees, except that it is recognized that in the course of business dealings, there may be times when meals and/or visits may be arranged. In such cases, such events should be reported to the Chairman of the Board, with the nature of the visit explained.
- (4) It is expected that vendors or suppliers of professional services to COC will be governed by the Code of Ethics to which their particular profession prescribes.
- (5) Any vendor or supplier found in violation of COC policy shall be barred from future business dealings with COC. COC reserves the right to have vendors and suppliers sign a statement of compliance with the standards of conduct of COC.



## PERSONNEL POLICY MANUAL

### Code of Ethics Policy – Chapter # 106

#### 1.0 TITLE

This shall be called the "Charter Oak Communities Code of Ethics."

#### 2.0 APPLICABILITY

The provisions contained herein shall apply to all employees of COC. With respect to contracted professional services of COC (legal, accounting, or otherwise), it is assumed that these professionals will abide by the professional ethics of their particular profession.

#### 3.0 PURPOSE

This Code of Ethics establishes standards for employee conduct that will assure the highest level of public service. Recognizing that compliance with any ethical standards rests primarily on personal integrity, and also recognizing in general the integrity of Commissioners and employees, it nevertheless sets forth those acts or omissions of acts that could be deemed injurious to the general mission of COC.

This Code of Ethics is not intended, nor should it be construed as, an attempt to unreasonably intrude upon the individual employee's right to privacy and the right to participate freely in a democratic society and economy.

#### 4.0 DEFINITIONS

"Agent" shall mean any employee of COC (whether full or part time) acting in his or her official capacity is an agent of COC.

"Claim" shall mean any demand, written or oral, made upon COC to fulfill an obligation arising from law or equity.

"Commissioner" shall mean one of the persons serving on the Board of Commissioners of COC.

"Contract" shall mean any obligation to do something arising from an exchange of promises or consideration between persons, regardless of the particular form in which it is stated.

"Conventional" shall mean those housing programs operated by COC, which are broadly considered part of the "conventional public housing program." This shall include but not be limited to, such programs as the Capital Fund, HOPE VI, the Housing Choice Voucher Program, Low Income Public Housing and State Assisted Housing Programs.

"Employee" shall mean any person appointed or hired, whether full or part time, seasonal, temporary, paid or unpaid, on a fixed or unfixed term, provisional or permanent.

**PERSONNEL POLICY MANUAL**  
**Code of Ethics Policy – Chapter # 106**

"Enrollee" shall broadly mean any applicant, resident, or program participant in any program operated by COC. Specifically, an "enrollee" shall be a person who expects to receive, or is receiving, or has requested some form of assistance from COC.

"Family" shall mean the spouse, domestic partner, father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, or half sister, as well as a person living in a stable family relationship with an employee.

"Gift" shall mean any gratuity or item of value, including but not limited to money, services, a trip, personal belongings, or special concessions in connection with personal business for less than fair market value, including any personal discount, offered to or received by an employee. Business meals or other business outings are not considered "gifts" unless the business component is not significant or the social component does not comport with the overall professional or business standard of avoiding actual and apparent conflicts of interest.

"Interest" shall mean a benefit or advantage of an economic or tangible nature that a person or a member of his or her family would gain or lose as a result of any decision, or action or omission to decide or act, on the part of COC, its Board, or employees.

"Leasing program" shall mean those programs operated by COC that are broadly included within the Section 8 Program or the tenant-based program, whether it be for certificates or vouchers. Unless otherwise noted, the provisions contained herein shall apply equally to both the "Leasing" and the "Conventional" programs of COC.

"Person" shall mean any individual, corporation, partnership, business entity, association, organization, and may include a COC employee.

"Public Information" shall mean information obtainable pursuant to the Freedom of Information Act and COC guidelines adopted pursuant thereto.

## **5.0 ETHICAL STANDARDS FOR EMPLOYEES**

No employee of COC shall have any employment, or engage in any business or commercial transaction, or engage in any professional activity, or incur any obligation in which directly or indirectly he or she would have an interest that would impair his or her independence of judgment or action in the performance of his or her official duties, or that would be in conflict with the performance of his or her official duties.

No employee shall have, or enter into, any contract with any person who has or enters into a contract with COC unless:



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- A. The contract between the person and COC is awarded pursuant to competitive bidding procedures and/or purchasing policies as outlined in regulations promulgated by the U.S. Department of Housing and Urban Development (HUD), state law, and COC Procurement Policy; or
- B. The contract between the person and COC is one in which the employee has no interest, duties or responsibilities, or if the contract with the person is one which the COC employee entered into prior to becoming an employee.

There shall be no preferential treatment given by an employee of COC acting in performance of his or her official duties to any person, agency or organization.

No COC employee shall use or permit the use of company owned vehicles, equipment, materials or property for the convenience or profit of himself, herself, or any other person. However this provision shall not apply in the case of usage for "diminutive" purposes, i.e., purposes which in and of themselves should not be construed as abuse of COC property.

No COC employee shall solicit any gift or consideration of any kind, nor shall any COC employee accept or receive a gift having value in excess of \$25.00 regardless of the form of the gift, from any person who has an interest in any matter proposed or pending before COC.

No COC employee acting individually can bind COC by any action or verbal representation.

No COC employee shall disclose without proper authorization non-public information or records concerning any aspect of the operation of COC, nor shall he or she use such information to the advantage or benefit of himself, herself, or any other person. This shall include records maintained on enrollees of COC for whom a properly executed release of information form shall be obtained and kept in the client file. The release of any information relative to enrollees of COC shall be done pursuant to government regulations allowing the release of information among government agencies or agencies receiving government subsidy, shall be done following prescribed methods of requesting and transmitting such information, and shall be done with full knowledge of the enrollee except in those cases where through action of law the enrollee's knowledge is not required.

No COC employee currently employed shall represent any person, other than himself, in business negotiations, judicial or administrative actions or procedures, to which COC may be a party.

No former employee of COC shall personally represent any person in a matter in which the former employee personally participated while employed by COC for one year, if such representation would be adverse to the interests of COC. This provision shall not, however, bar the timely filing by a current or former employee, of any claim, account, demand, or suit arising out of personal injury, property damage, or any benefit authorized or permitted by law.



## PERSONNEL POLICY MANUAL

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No member of the family of any COC employee shall be appointed or hired to serve under the direct supervision of that employee, and in no event shall any COC employee participate in the decision-making regarding employment or contract for services of any family member.

No COC employee shall have an interest in a contract between any person and COC, except that this provision shall not apply if the contract was entered into prior to the employee's hire by COC; the employee discloses his or her interest in the contract prior to employment; and after employment, the employee has no power to authorize or approve payment under the contract, monitor performance or compliance under the contract, or audit bills or claims under the contract and the compensation of the employee will not be affected by the contract.

No COC employee shall have any employment, engage in any business or commercial transaction, or engage in any professional activity in which, directly or indirectly, he or she would have an interest that would impair his or her independence of judgment or action in the performance of his or her duties with COC or that would be in conflict with his or her duties at COC.

No employee of COC shall discuss, vote upon, decide or take part in (formally or informally) any matter before COC in which he or she has an interest. Exception shall be made in the case of an employee whose interest in the matter is minimal (e.g. an employee helping decide on a new telephone system owns 100 shares of AT&T stock), provided the employee shall fully and specifically describe his or her interest, in writing, and the underlying basis of it, whether it be ownership, investment, contract, claim, employment or family relationship, to his or her immediate supervisor prior to the employee's participation. If, in the opinion of the supervisor, there is any question as to whether the interest is minimal, the matter shall be referred to the Ethics Review Committee for a binding decision on the question.

Any matter decided on, contracted, adjudicated, or in any way acted upon by an employee who does not disclose a personal interest either in the matter, or in any person or organization having an interest in the matter, may be considered null and void by COC.

Such a matter will be reviewed by the Board of Commissioner or its designee, who will render judgment and recommend any penalties, if appropriate. If the Board of Commissioners renders judgment that a matter was performed; a contract entered into; or any matter was conducted, decided or acted upon in a manner prohibited by the Code of Ethics; it may then propose, among other things, to direct its legal counsel to seek an injunction against the proscribed action.

No person employed by COC shall be permitted to participate as an "Owner" (Section 8 landlord), lessor or lessor's agent in the leasing programs. These prohibitions, however, shall not apply where the employee is a principal in a not-for-profit or charitable, educational, or humanitarian agency or organization that may own or manage housing for rental purposes.



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### 6.0 ETHICAL STANDARDS FOR COMMISSIONERS

The Board of Commissioners of COC is the architect of policy governing the operations of COC and retains legal and fiscal responsibility for COC. Recognizing that the commissioners are chosen from a broad range of fields and professions and community interests renders difficult the circumscription of external interests and activities of the Commissioners. However, the members of the Board of Commissioners are governed by the Stamford Municipal Code of Ethics. Stamford Municipal Code, Chapter 19, the HUD Annual Contributions Contracts, federal regulations and State statutes.

### 7.0 ETHICS REVIEW COMMITTEE

The Board of Commissioners may establish an Ethics Review Committee, hereinafter referred to as “Committee”.

The purpose of this Committee shall be to review and render decisions on any matters involving ethical conduct, or breach of ethical conduct, by employees, or vendors.

The Committee is empowered by the Board of Commissioners to:

- A. Call witnesses and receive depositions in the performance of its duties.
- B. Call for provision of appropriate records, files or tapes relative to the performance of its duties.
- C. Review any records maintained by COC, except those records that are considered confidential or personal. However, confidential records may be examined upon execution of a proper release by the subject person.

In performing its duties, the Committee may:

- A. Issue rules and regulations consistent with and to clarify the Code of Ethics.
- B. Review any questions concerning alleged or suspected infractions of the Code of Ethics and make recommendations to the Board of Commissioners for further or final actions.
- C. Require financial disclosure or disclosure of any other pertinent information by employees or vendors.
- D. Oversee compliance by COC with the Code of Ethics and any other applicable regulations involving ethics.

The Executive Director/CEO shall be an *ex officio* member of the Committee.





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The Committee shall make reports and recommendations for action to the Board of Commissioners. If the Board finds a recommended action is properly within the purview of the Executive Director/CEO or his or her designee, it shall delegate the matter without further Board action.

The legal counsel of COC may be involved in the deliberations of the Committee, but he/she has no vote and cannot serve as a Committee member.