

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

Officer may issue a notice of termination for default, unless the failure to perform has been cured.

1. **Notice**-If the contractor has failed to perform within the required time and termination for default appears appropriate, the Contracting Officer shall notify the contractor in writing of the possibility of termination. This notice shall call the contractor's attention to the contractual liabilities if the contract is terminated for default, and request the contractor's to "show cause" why the contract should not be terminated. If the response to this "show cause" notice is inadequate or insufficient, the contract shall be terminated for default.
2. **Alternatives to Termination**-Alternatives to termination for default include the following (at LHC's discretion).
  - a. Allow alternative dispute-resolution (arbitration or mediation) as agreed by both parties.
  - b. Allow the contractor or the surety to continue performance of the contract under a revised delivery schedule (in exchange for a reduced contract price or other consideration).
  - c. Permit the contractor to continue the performance of the contract by means of a subcontract or other business arrangement with an acceptable third party, provides the rights of LHC are adequately protected; or
  - d. If the contractor is not liable to LHC for damages, execute a co-cost termination settlement agreement.
3. **Repurchase**-When the supplies, services, or construction activities are still required after termination, the Contracting Officer shall seek to contract for the same or similar items as soon as possible. The Contracting Officer may use any appropriate contracting method for the procurement, provided competition is solicited to the maximum extent practicable to secure the lowest price obtainable under the circumstances in order to mitigate damages.

**Assistance to Small and Other Business**

Consistent with Presidential Executive Orders (**11625, 1238, and 12432, and Section 3 of the HUD Act of 1968**), all feasible efforts shall be made to ensure small and minority-owned businesses, women business enterprises, and other individuals or firms



**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

located in or owned in substantial part by persons residing in the area of the LHC project are used when possible. Such efforts shall include, but shall not be limited to:

- A. Including such firms, when qualified, on solicitations mailing lists;
- B. Encouraging their participation through direct solicitation of bids or proposals whenever they are potential sources;
- C. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such firms;
- D. Establishing delivery schedules, where requirement permits, which encourage participation by such firms;
- E. Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce;
- F. Including in contracts, to the greatest extent feasible, a clause requiring contractors, to provide opportunities for training and employment for lower income residents of the project area and to award subcontracts for work in connection with the project to business concerns which provide opportunities to low-income residents, as described in **(24 CFR Part §135)** so-called Section 3 Businesses; and
- G. Requiring prime contractors, when subcontracting is anticipated, to take the positive steps listed above.
- H. Including a contract clause requiring contractors, to the greatest extent feasible, to provide opportunities for training and employment for lower income residents of the project area and to award subcontracts for work in connection with the project to business concerns which provide opportunities to low-income residents, as described in 24 CFE Part §135 ("Section 3 Businesses"; and
- I. Requiring prime contractors, when subcontracting is anticipated, to take the positive steps listed above.



**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

Goals shall be established periodically for participation by small businesses, minority-owned businesses, women-owned business enterprises, labor surplus area businesses, and Section 3 business concerns in LHC prime contracts and subcontracting opportunities. Qualifying businesses are:

1. A **small business** is independently owned; not dominant in its field of operation; and not an affiliate or subsidiary of a business dominant in its field of operation. The size standards in (13 CFR §121) should be used to determine business size.
2. A **minority-owned business** is a business which is at least 51% owned by one or more minority group members; in the case of a publicly owned business, one in which at least 51% of its voting stock is owned by one or more minority group members, and whose management and daily business operations are controlled by one or more such individuals. Minority group members include, but are not limited to Black Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, Asian Indian Americans, and Hasidic Jewish Americans.
3. A **women's business enterprise** is a business that is at least 51% owned by a woman or women who are U.S. citizens and who control and operate the business.
4. A **"Section 3 business concern"** is as defined under (24 CFR Part §135) as
  - A. 51% owned or more by section 3 residents; or
  - B. A business whose permanent, full-time employees include persons, at least 30% percent of whom are currently section 3 residents, or within three years of the date of first employment with the business concern was section 3 residents; or
  - C. A business that provides evidence of a commitment to subcontract in excess of 25% percent of the dollar award of all subcontractors to be awarded to business concerns that meet the qualifications set forth in paragraphs (1) and (2) in this definition of "section 3" business concern".

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

5. A **labor surplus area business** is a business which, together with its immediate subcontractors, will incur more than 50% of the cost of performing the contract in an area of concentrated unemployment or underemployment as defined by the DOL in **(20 CFR Part §654)**, Subpart A, and in the list of labor surplus areas published by the Employment and Training Administration.

**Alternative Procurement Program**

**General-**The Executive Director shall be authorized to establish an Alternative Procurement Program pursuant to 24 CFR 963 as a method to solicit and contract with eligible and qualified resident owned businesses for public housing supplies, services, or construction. The solicitation is limited to resident owned businesses.

A resident owned business is a business concern of which 51% is owned and controlled by one or more public housing residents. The management and daily business operations shall be controlled by one or more residents. All securities which constitute ownership or control of a corporation for purposes of establishing the business shall be held directly by then public housing resident (S). No securities held in trust by any guardian for a minor shall be considered as held by the public housing resident (s) in determining the ownership or control of a corporation. The term includes sole proprietorships.

1. **Conditions for Use-**Contracts awarded may not exceed \$1,000,000 (million) individually or in aggregate. If the resident owned business is not a sole proprietorship, **the resident owned business must:**
2. **Be a Legally Formed Business-**The business must certify that it was formed in accordance with Michigan State Law.
3. **Be a Resident Owned Business-**The business must certify that it is a resident owned business.
4. **Have the Responsibility to Complete the Contract-**The business shall submit evidence to demonstrate that the business has the ability to perform successfully under the terms and conditions of the proposed contract.



**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

5. **Certify on Previous Alternative Procurement Contract awards**-The business shall certify on the number of contracts awarded and the dollar amounts of contract awarded under the Alternative Procurement Program.

If the resident owned business is a sole proprietorship, LHC shall not award an employment type contract.

Under the alternative procurement process, LHC shall:

1. Prepare an independent cost estimate for the procurement
2. Select the appropriate methods of procurement (small purchase, sealed bid, competitive proposals, and non-competitive proposals);
3. Solicit a bid, proposal or offer from one or more resident owned businesses;
4. Ensure that the resident owned responses include a certification regarding previous contracts.
5. Perform a cost or price analysis to determine price reasonableness.
6. Awards a contract to the bidder/offeror/respondent whose bid/offer/proposal is most advantageous to LHC consistent with the evaluation factors stated in the solicitation;
7. Ensure the selected resident owned business is capable of performing satisfactorily; and
8. Ensure the procurement files are documented

**Disposition of Surplus Property**

Property no longer necessary for LHC's purposes (personal property) shall be transferred, sold, or disposed of in accordance with applicable Federal, State and local laws, and regulations (See Disposition or Capitalization Policy for guidance).

**Documentation**

LHC must maintain records sufficient to detail the significant history of each procurement action. These records **shall** include, but **shall not** necessarily be limited to, the following:

- A. Rationale of the method of procurement (if not self-evident);
- B. Rationale of contract pricing arrangement (also if not self-evident)

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

- C. Reason for accepting or rejecting the bids or offers;
- D. Rationale for choosing the selected vendor (if not self-evident);
- E. Basis for the contract price (as prescribed in this handbook);
- F. A copy of the contract documents awarded or issued and signed by the Contracting Officer;
- G. Basis for contract modification; and
- H. Related contract administration actions

The level of documentation should be commensurate with the value of the procurement.

Records are to be retained for a period of three years after final payment and all Matters pertaining to the contract are closed.

**Disposition of Surplus Property**

Property no longer necessary for LHC's purposes (non-real property) shall be transferred, sold, or disposed of in accordance with applicable Federal, State and local laws and regulations.

**Funding Availability**

Before initiating any contract, LHC shall ensure there are sufficient funds available to cover the anticipated cost of the contract or modification.

**Self-Certification**

LHC self-certifies this Procurement Policy, and LHC's procurement system, complies with all applicable Federal regulations and, as such, the LHC is exempt from prior HUD review and approval of individual procurement actions.

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

**Appendix A**

**List of Direct Payments**

The following is a list of direct payments that are exempt from competitive procurement.

Utility bills (water, sewer, electricity, natural gas, and other regulated utility expenses).

Postage and other purchases from the U. S. Postal Services.

Licenses, permits, and fees from governmental or regulatory entities at the federal, state, or local levels.

Purchases from other governmental entities where the governmental entity provides goods or services not available from the private sector.

Services or user fees paid to governmental cooperative purchasing organizations.

Credit card charges for gasoline and emergencies while on travel status.

Legal services such as arbitration fees, litigation fees, expert witness fees, witness fees, court costs, and related expenses (but not the cost of outside counsel, investigations or related matters).

Payments of litigations/administrative settlements and judgment and claims against the LHC.

Accounting and auditing fees.

Renewal of existing annual proprietary maintenance or support agreements, and software license renewals for computer and telecommunication-related services.

Taxi, public transportation, and toll fares; mileage and incidental parking expenses.

Publications and subscriptions.

Mailing lists.





**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

Professional association membership dues, fees, licenses accreditation, and certifications.

Conference and convention expenses and fees for LHC employees, residents, program participants, volunteers, or members of the Board conducting LHC business.

Opportunities, purchasing and contracting solicitations, sale of surplus items, public announcements, and outreach, etc. This exception does not include printing, design, or graphic services.

Freight bills, express shipping, common carriers, and delivery services.

Honoraria and stipends.

Insurance deductible

Travel expenses for LHC's employees, residents, program participants, volunteers or members of the Board necessary to conduct business.

Training registration fees and tuition for pre-established, non-LHC specific, off-site classes, seminars, workshops, etc. for the LHC employees, residents, program participants, volunteers and members of the Board.

Testing and travel expenses of employment applicants (including moving expenses for eligible personnel). This includes travel expenses of certain out-of-state job applicants.



**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

**Appendix B**

**Glossary of Terms**

**Acceptance** -The act of an authorized representative of the LHC acknowledging that the supplies or services delivered to or received by the LHC conform to contract requirements.

**Amendment** - A written revision made to a solicitation.

**Annual Contributions Contracts (ACC)** – A contract between HUD and the LHC setting forth requirements for the operation and development of Public Housing.

**Architect/Engineer (A/E)** – A licensed person (or company) usually responsible for developing the plans and specifications of a building or development and, in some cases, supervising the construction effort.

**Bid** – In the sealed bidding method of procurement, this is the price submitted by a bidder.

**Bidder's List** – General lists of persons or firms who may be interested in submitting bids in response to an Invitation for Bid and in contracting opportunities with the LHC.

**Bonding (Big Bonds)** – A bid bond or guarantee ensures that, if awarded the contract, the bidder will accept and perform the work under the contract; ensures the bidder will not attempt to withdraw or otherwise not fulfill the contract; and ensures the bidder will execute the contractual documents that are required within the time specified in the solicitation, or forfeit all or part of the guarantee.

**Bonding (Performance Bond)** – A performance bond ensures the contract is successfully completed. The performance bond also ensures that if a contractor is unable to complete the contract, the surety company, which issues the bond will step in to complete the work. In the case of a letter of credit or cash escrow, LHC may use these funds to complete the contract work.

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

**Bonding (Payment Bond)** – A payment bond ensures the contractor pays the subcontractors and suppliers. LHC will allow the performance bond and the payment bond to be combined.

**Cure Notice** – A document originating by the LHC Contracting Officer or designee sent to the contractor stating the contract may be terminated unless performance is corrected within a specified number of days.

**Expedited Purchases** – A method of purchasing made with Petty cash. This type of Procurement shall not exceed \$300.

**Emergency** – An emergency condition is an immediate threat to health and safety of the residents or employees of the LHC.

**Exigent Condition** – An exigent condition is a situation or condition requiring immediate aid or action. Only the Executive Director or designee has the authority to declare an exigent condition.

**Firm Fixed Price Contract** – A contract pricing arrangement under which the price is not subject to change or adjustment based on the cost experience of the contractor in performance of the contract.

**Independent Cost Estimate (ICE)** – An estimate obtained or developed by the LHC prior to obtaining offers.

**Inspection** – The examination and/or testing of supplies and services to determine whether they conform to the contract requirements.

**Intergovernmental Agreement** – An agreement between the LHC and a Federal, State, or local government agency (including other Public Housing Agencies) for the provision of procuring supplies or services. For the purpose of this Policy, the terms Cooperative Agreement, Intergovernmental Agreement, Interagency Agreement, Consortium Agreement, or Memorandum of Agreement are interchangeable.

**Invitation for Bids (IFB)** – Solicitation type used under the sealed bidding method of procurement.



**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

**Micro-Purchasing** – A method of purchasing above the debit purchasing level of \$99,999 and below \$3,000. 00. This type of purchasing requires on (1) quote.

**Minority Owned Business** – A minority-owned business is defined as a business which is at least 51% owned by one or more minority group members; or in the case of a publicly-owned business, one in which at 51% of its voting stock is owned by one or more minority group members, and whose management and daily business operations are controlled by one or more such individuals. Minority group members include, but are not limited to Black Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, Asian Indian Americans, and Hasidic Jewish Americans.

**Negotiation** – Discussions with offerors in the competitive range regarding technical and/or price proposals to award a contract using the competitive proposals or noncompetitive proposals method of procurement or when issuing modifications to existing contracts.

**Noncompetitive Proposals** – The method of procurement in which proposals are solicited from only one source because award of a contract is not feasible under the small purchase procedure, sealed bids or competitive procedure as a result of; 1) the item or service is available only from a single source; 2) public exigency or emergency will not allow enough time for a competitive procurement; 3) inadequate responses to a competitive solicitation; 4) HUD approves the use of noncompetitive proposals. The method is also known as "sole source".

**Offer** – A response to a solicitation that, if accepted, would bind the offeror to perform the resultant contract.

**Offeror** – The general term for the entity that submits a response to a solicitation.

**Price Analysis** – The evaluation of a proposed price (bottom line) for reasonableness, without evaluating the separate elements of costs.

**Procurement** – The term "procurement", includes the procuring, purchasing, leasing, or renting of; 1) goods, supplies, equipment, and materials; 2) construction and

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

maintenance; 3) consultant services; 4) Architectural and Engineering (A/E) services; 5) Social Services, and 6) other services.

The term "procurement" also includes selling, concessions and disposal of surplus materials and equipment.

**Proposal** – The offer submitted by a potential contractor in the competitive or noncompetitive proposals type of procurement.

**Qualifications Base Selection (QBS)** – A form of procurement of Architect/Engineering (A/E) or development services by competitive proposals in which proposals are not requested in the Request for Qualifications (RFQ) or used as an evaluation factor.

**Quotation** – The price or cost submitted by a vendor in the small purchase procedures method of procurement.

**Request for Proposals (RFP)** – Solicitation method used under both the competitive and non-competitive methods of procurement. Proposal evaluation and contractor selection are based on the evaluation criteria and factors, including price, for award as stated in the RFP. Contract award is based on the best approach to the requirements of the statement of work resulting in the greatest benefit to the LHC, price and other factors considered.

**Request for Qualifications (RFQ)** – Solicitation method used under competitive and non-competitive methods of procurement. Evaluation and contractor selection are based on the evaluation criteria for award as stated in the RFQ. Price is not obtained until the highest-ranking firm (s) is selected based on qualifications and negotiations for a fair and reasonable price have started.

**Resident Owned Business** – A resident owned business is any business concern that is owned and controlled by public housing residents.

**Responsible Bidder** – A bidder who is: 1) able to comply with the a required or proposed delivery or performance schedule; 2) has a satisfactory performance record; 3) has a satisfactory record of integrity and business ethics; 4) has the necessary organization and operational skills, or the ability to obtain them; 5) has the necessary



**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

production, construction, and technical equipment and facilities, or the ability to obtain them; and 6) is otherwise qualified and eligible to receive an award under applicable laws and regulations (including the fact the bidder is not suspended, debarred or under a HUD or LHC imposed Limited Denial or Participation).

**Responsive Bid** – A bid that conforms to the requirements in the Invitation for Bids (IFB).

**Sanctions** – Measures that may be evoked by the LHC or HUD to exclude or disqualify contractors, LHC staff or agents acting on behalf of the LHC from participation in HUD programs (such as limited denial of participation or disbarment), or measures the LHC may take regarding employees, officers, agents, or others who violate the ethical standards of the Procurement Policy (such as dismissal, reassignment, removal from position, etc.).

**Sealed Bidding** – A method of procurement inviting sealed bids.

**Section 3 Business** – A “Section 3 business concern” is defined under 24 CFR Part 135.

**Show Cause Letter** – A document sent by Contracting Officer or designee notifying a defaulting contractor that contract may be terminated for default unless the contractor can provide adequate justification for not terminating within a specified time period (usually 10 days).

**Small Business** – A small business is defined as a business that is: 1) independently owned; 2) not dominant in its field of operation; and 3) not an affiliate or subsidiary of a business dominant in its field of operation. The size standards in 13 CFR 121 should be used to determine business size.

**Small Purchase Procedure** – A simplified method for acquiring supplies, materials and services (including construction) that do not exceed the LHC threshold of \$100,000.

**Solicitation** – The general term for the LHC’s requests for offers from potential offerors.

**Lansing Housing Commission  
Policy No. 2010-6  
Procurement Policy**

**Specification or Scope** – Description of the technical requirements of a solicitation or resulting contract.

**Statement of Work (SOW)** – Written description of work to be performed that establishes the standards sought for the supplies or services furnished under the contract; typically used for service contracts.

**Termination for Cause** – Termination of a contract by the LHC on a unilateral basis when the contractor fails to perform, fails to make progress so as to endanger performance, or commits a default as specified in the contract.

**Termination for Convenience** - Termination of a contract by the LHC on a unilateral basis when the product or service is no longer needed or when it is in the best interest of the LHC.

**Vendor List** – List of persons interested in or qualified to do business with the LHC.

**Women Business Enterprise** – Women's business enterprise is defined a business that is at least 51% owned by woman or women who are U. S. citizens and who control and operate the business.





COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**October 25, 2017**

**Lansing Housing Commission  
Lansing, Michigan**

**HONORABLE MEMBERS IN SESSION:**

**SUBJECT:**

**Approval of Policy No. 2009-4, The Lansing Housing Commission's Customer Service Policy - Resolution No. 1282**

**RECOMMENDATION:**

Staff recommends approval of Resolution No. 1282, which adopts the revision of the LHC's Customer Service Policy No. 2009-04 as.

**CONTACT PERSON:**

Martell Armstrong  
Executive Director  
(517) 487-6550 X 111

**SUMMARY:**

The Customer Service Policy establishes the standard to be followed by staff when dealing with LHC's Internal and External customers.

**BACKGROUND**

The Customer Service Policy defines the quality of service customers those doing business with LHC can expect when interfacing with LHC.

This policy was reviewed by the Director of Asset Management who used the Nan McKay Customer Service Training material for any changes in the policy the staff developed when this was initially created. The Executive Office is responsible for administration of the Policy.





COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**FINANCIAL CONSIDERATIONS:**

There are no financial considerations.

**POLICY CONSIDERATIONS:**

One of the major governance responsibilities of the Board is to set policy for LHC. This policy is consistent with industry standards. It provides reasonable guidelines for providing high quality customer service and defines the level of customer service the public can expect from LHC staff.

Respectfully Submitted, \_\_\_\_\_

Martell Armstrong, Secretary to the Board  
Lansing Housing Commission







COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

## RESOLUTION NO. 1282

### ADOPTED BY THE LANSING HOUSING COMMISSION

October 25, 2017

#### BE IT RESOLVED BY THE LANSING HOUSING COMMISSION:

The attached Customer Service Policy, dated October 25, 2017, is adopted by the Lansing Housing Commission effective October 25, 2017. Martell Armstrong, in his capacity as the Executive Director, or his designee, is authorized to issue and administer the Customer Service Policy.

  
Chair

Yeas 4  
Nays 0  
Abstentions 0

Attest   
Secretary:

For Clerk Use Only

Resolution No.: 1282  
Date Adopted: 10-25-17





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

## **Lansing Housing Commission Policy No. 2009-4 Customer Service Policy**

---

### **OVERVIEW**

The Lansing Housing Commission has daily contact with the public in a variety of ways. The purpose of this Customer Service Policy is to reinforce, with our employees and customers, that exemplary customer Service is expected and shall be received by our customers when dealing with LHC. In addition, it establishes customer service standards and expectations for how LHC will interface with the public.

Everyone who interfaces with LHC is a customer as a result we serve a broad spectrum of internal and external Customers including, but not limited to:

Individual Citizens  
State and Local Government Personnel  
Public Housing Residents & Applicants  
Assisted Housing Voucher Holders, Landlords and Applicants  
LHC's Board and  
LHC Employees

LHC acknowledges customers are the most visible part of the public service we provide. LHC believes targeting customer service with a dedicated effort results in better customer service and higher customer satisfaction. We also recognize customer satisfaction is work and customer dissatisfaction is even more work! Our commitment to Customer Service is exemplified in our **CUSTOMER SERVICE PLEDGE:**

*"LHC staff strives to be reliable in all dealings with customers. We will:*

- work diligently to solve problems and respond to customer needs*
- be consistent with our responses to internal and external customers and*
- do what we say we will do.*

**Good Customer Service** requires LHC staff to meet the needs and expectations of the customer as defined by the customer. Meeting the needs and expectations of the customer, means you know what your customers want and what they expect, and you provide that to them on a consistent basis. In order to have an effective customer service initiative, staff must listen to, and/or review each customer's request seeking to understand the request without making any assumptions other than those stated below:





**Lansing Housing Commission  
Policy No. 2009-4  
Customer Service Policy**

---

**ASSUME**

***Customer Needs Are Paramount To LHC's Business*** – LHC is always open to responding to comments and suggestions to improve the way we deliver our services. All employees shall welcome this feedback. LHC needs continuous feedback in order to continue to meet customer needs.

***Communication Is Key To Our Success*** – Staff should adjust their communication “style,” as necessary, and develop effective tools to open lines of communication with our customers. We may not satisfy every customer, but by explaining the facts, offering sound advice and maintaining a pleasant demeanor we have done our best.

***Customers Know What They Want*** – Do not assume that you know what customers want and need, instead ask the customer what they want or need and really listen to the response.

***Customers Want Quality Service*** – Our customers deserve our best efforts, as well as our respect and courtesy every time they contact us. Go the extra mile, exceed their expectations!

***Customers Will Judge LHC Based On What They See And Hear*** – They expect you to do what you say you will do when you say it will be done.

***Customers Expect Good Customer Service*** – Customers expect LHC staff will be helpful and they are pleased when you go beyond a minimal response.

**LHC CUSTOMER SERVICE STANDARDS**

The following Customer Service standards will be emphasized in all facets of LHC's operations:

- We will answer written customer inquiries within the FOIA requirements.
- We will greet callers and identify our self when answering the telephone.
- Staff will answer telephone calls promptly and courteously, within four rings, and return all voice mail messages within 48 hours.
- We will listen intently to callers, ask questions to insure we understand the issue(s) take notes, as necessary, and repeat/summarize what we heard to insure clarity.



419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2009-4  
Customer Service Policy**

---

- When contacting LHC, you will speak to a knowledgeable person who will answer your question(s), or refer the question(s) to the correct person.
- If you are improperly referred, the 2nd responder will identify the correct person and have that person to call you back.
- If you telephone LHC with a complaint, we will advise you on the telephone or refer your complaint to the proper source.
- Before ending a telephone call, staff will ask if we have addressed the caller's needs.
- Staff will empty their voicemail box often enough to ensure it is never full, Voicemail messages will be changed (when out of the office for 8 hours or more) to reflect when an employee is out of the office, when s/he will return and who is covering in their absence.
- Routine non-FOIA email or other electronic inquiries will be answered promptly and courteously within 48 hours.
- Staff will create an email auto-reply, if they will be out of the office for more than eight hours, indicating when they will return and who will cover in their absence
- If you have an appointment with an employee and you arrive on time, you will be helped within 5 minutes of your arrival. If you arrive late you will be seen within 30 minutes.
- You will not wait more than 30 minutes to see an employee if you do not have an appointment.
- Requests for copies by mail will be provided consistent with LHC's FOIA guidelines.
- LHC will give customers the option to receive information in electronic form where possible.
- LHC will respond to Maintenance Requests within 72 hours.
- LHC will respond to requests for HCV inspections within 72 hours.
- LHC staff will deliver on their promises. We will do what we say we are going to do by the promised due date.

**CUSTOMER SERVICE IN ACTION**

The customer service standards we have set for ourselves are goals to be met, and do not necessarily represent current levels of performance. To improve customer service, we will concentrate on working to meet the standards we have set to improve our service effectiveness. On some of the standards, our performance can be measured internally; in other cases, it will be tested through surveys.





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2009-4  
Customer Service Policy**

---

These initiatives are aimed at improving our customer service, introducing more common sense into the way we do our work, and reducing costs. LHC has an open-door policy which enables all customers to have direct access to staff.

**CONTACT LHC WITH CUSTOMER SERVICE COMMENTS**

If your customer service was exemplary or if you do not believe the Customer Service you received from LHC met the standards contained in this Policy, we want to know. We seek out customer satisfaction and dissatisfaction so that we can improve our customer service. If you have a compliment, problem or suggestion, are unsatisfied with our responses or have recommendations for improving our services you may:

- Provide feedback to the person who served you.

**Or**

- Contact the Supervisor of the person who served you. The employee will provide the name and telephone number of his/her supervisor if asked.

**Or**

- Speak, or write, to the Manager in charge. The names of Managers are posted in every LHC lobby or may be obtained by calling us at (517) 487-6550 or visiting our web site at [www.LHC@lanshc.org](http://www.LHC@lanshc.org). We will provide a response within ten working days or contact you within 10 working days to indicate when a response will be forthcoming.

**Or**

- Fill out our Customer Satisfaction Survey at the front desk, or complete our on-line electronic customer service satisfaction survey. No requests for an appointment will be denied. Meetings will be scheduled within 7-10 calendar days.

**Or**

- Send an email message to our Executive Director at [martella@lanshc.org](mailto:martella@lanshc.org). He will personally ensure your question is answered or your issue addressed. If you request a reply, we will provide an email response within 48 hours.



419 Cherry Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**October 25, 2017**

**Lansing Housing Commission  
419 Cherry St.  
Lansing, Michigan 48933**

**HONORABLE MEMBERS IN SESSION:**

**SUBJECT:**

**Approval of Lansing Housing Commission's Revised Electronic Communication/Social Media Policy 2012-1-Resolution No. 1283**

**RECOMMENDATION:**

Staff recommends the Approval of Resolution No. 1283, which adopts the Revision of the Communication/Social Media Policy No. 2012-1.

**CONTACT PERSON:**

Martell V. Armstrong  
Executive Director  
(517) 372.7996

**SUMMARY:**

This Resolution revises the previous Electronic Communication Policy, which was designed to address an emerging nationwide problem which has spawned lawsuits, hacking, and fraud. The current revisions expand on proper usage of LHC company devices and also further addresses social media usage.

**BACKGROUND**

LHC conducts business in a manner that is centered the delivery of services to a diversity of public customers. LHC has daily interactions with the public during which the public has an expectation of privacy. With the expansion of electronic communication devices, and social media platforms, we have determined it is necessary to set forth rules and guidelines which cover this issue, provide direction to employees and establish an exception for internal and external customers in order to protect the organization from litigation, hacking, fraud, and other associated risks.





### **FINANCIAL CONSIDERATION**

There are no financial consideration associated with this policy. The intent is to protect against a financial liability because of actions/inactions by employees.

### **POLICY CONSIDERATIONS**

One of the major governance responsibilities of the Board is to establish Policies which govern the operations of the LHC. Adopting the Electronic Communication/Media Policy fulfills the Board's fiduciary responsibility to approve LHC policies utilizing good governance practices.

Respectfully Submitted, \_\_\_\_\_



Martell V. Armstrong, Secretary to the Board  
Lansing Housing Commission





COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Resolution No. 1283**

Adopted By the Lansing Housing Commission

October 25, 2017

**BE IT RESOLVED BY THE LANSING HOUSING COMMISSION:**

Martell V. Armstrong, acting in the capacity of Executive Director, is authorized to immediately administer Lansing Housing Commission's updated Electronic Communication/Social Media Policy.

  
Chair

Yeas 4

Nays 0

Abstentions 0

Attest:

  
Secretary

For Clerk Use Only

Resolution No. 1283  
Date Adopted 10/25/2017







419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

**PURPOSE**

The purpose of Lansing Housing Commission's Electronic Communication and Social Media Policy is to maximize the benefits of electronic communications to LHC, and its employees and customers, protect LHC and its employees from liability and/or performance challenges, highlight the problems associated with inappropriate use of social media and describe the consequences of policy violations.

**I. Company Property**

As a productivity enhancement tool, LHC provides and encourages the business use of electronic communications (notably the Internet, voice mail, electronic mail, and fax). Electronic communications systems, owned by LHC, and all messages generated on or handled by these electronic communications systems, including back-up copies, are considered to be the property of LHC. Any attempt to violate, circumvent and/or ignore these policies could result in corrective action, up to and including termination. (Note: Computer and Electronic Equipment Policy #2009-11)

**II. Authorized Usage**

LHC's electronic communications systems must be used solely to facilitate the business of the company. Users are forbidden from using LHC electronic communication systems for private business activities, personal, or amusement/entertainment purposes. Employees are reminded that the use of company resources, including electronic communications, should never create either the appearance or the reality of inappropriate use. Employees shall not access or disclose a tenant/client/program participant's (even if that individual is a family, friend, or co-employee) personal information from any LHC source (e.g., documents, computer system), unless previously authorized, in writing, by the **Department Director** to do so for a specific work-related purpose. Inappropriate use may result in loss of access privileges and disciplinary action, up to and including termination. (Note: Section J Computer and Electronic Equipment Policy #2009-11)

**III. Proper Usage**

Employees are strictly prohibited from using LHC computers, e-mail systems, and Internet access (except at lunch or break) for personal reasons or for any improper



419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

purpose (at any time). Some specific examples of prohibited uses include, but are not limited to:

1. Transmitting, retrieving, downloading, or storing messages or images which are offensive, harassing, abusive, derogatory, off-color, sexual in content, or otherwise inappropriate in a business environment.
2. Making threatening or harassing statements to another employee, or to a vendor, customer, or other outside party.
3. Transmitting, retrieving, downloading, or storing messages or images relating to race, religion, color, sex, national origin, citizenship status, age, handicap, disability, sexual orientation, or any other status protected under federal, state and local laws.
4. Communicating confidential information to individuals inside or outside LHC or to other organizations, without specific authorization from management to do so.
5. Sending or receiving confidential or copyrighted materials without prior authorization.
6. Soliciting personal business opportunities, or personal advertising.
7. Gambling, monitoring sports scores, or playing electronic games.
8. Downloading software without approval from a manager. Software that is approved for downloading must be registered to the Housing Authority.
9. Copying software, unless such copying for legitimate back-up purposes and has been approved by a manager.
10. Knowingly introducing a computer virus or any other contaminating or destructive features in to LHC computer systems.
11. Downloading files from the internet except for an express business purpose.





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

12. Sending or forwarding any chain email, broadcast email or spam.
13. Use a LHC email address or internet access for personal gain including outside employment, self-employment, and family owned businesses.
14. Download radio, video, or music transmissions from internet sites without approval.
15. Attempt to defeat any security mechanisms to gain unauthorized access to computer files or other information on the Housing Authority's telephone systems, electronic communication systems, or information systems.
16. Attempting to read, intercept, copy, or delete emails sent or received by other users.
17. Posting or transmitting any message anonymously under a false name or permitting any other individual to do so; Impersonating another person; Collection information about others including email addresses, without their consent.
18. LHC's phone, fax machine, computer systems, or provided communication devices shall not be used for personal financial gain or to solicit others for activities related to LHC's operations, or in connection with political campaigns, lobbying, or religious purposes.

**IV. User Identification**

Where electronic communication systems provide the ability to identify the activities of different users, these facilities shall be implemented. For example, electronic mail systems shall employ personal user-IDs and associated passwords to isolate the communications of different users. Fax machines that do not have separate mailboxes for different recipients may not support user separation.

**V. User Accountability**

Regardless of the circumstances, individual passwords must never be shared or revealed to anyone else besides the authorized user. To do so exposes the



419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

authorized user to responsibility for actions taken by others with the password. Violation of this could result in corrective action towards the authorized user and the person receiving the password, up to and including termination. If users need to share computer resident data, they should utilize message forwarding facilities, public directories on local area network servers, and other authorized information-sharing mechanisms. To prevent unauthorized parties from obtaining access to electronic communications, users must choose passwords, which are difficult to guess (for example, not a dictionary word, not a personal detail, and not a reflection of work activities).

**VI. User Identity**

Misrepresenting, obscuring, suppressing, or replacing a user's identity on an electronic communications system is forbidden. The user name, electronic mail address, organizational affiliation, and related information included with electronic messages or postings must reflect the actual originator of the messages or postings.

**VII. No Expectation of Privacy**

Employees should expect that all information created, transmitted, downloaded, received or stored in LHC computers may be accessed by LHC at any time, without prior notice. Employees should not assume that they have an expectation of privacy or confidentiality in such messages or information (whether or not such messages or information is password protected), or that deleted messages are necessarily removed from the system.

**VIII. Regular Message Monitoring**

Contents of electronic communications may be monitored and the usage electronic communications systems will be monitored to support operational, maintenance, auditing, security, and investigative activities. LHC reserves the right to disclose any electronic messages to law enforcement officials without prior notice to any employees who may have sent or received such messages. Users should structure their electronic communications in recognition of the fact that LHC will, from time to time, examine the content of electronic communications. Employees are reminded that all messages are LHC records. Therefore, LHC reserves the right to access and disclose all messages sent over its electronic messaging systems. LHC's IT vendor and Supervisors may review the electronic communications of the employees they supervise to determine whether there have





**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

been any breaches of security, violations of LHC policy or unauthorized actions on the part of the employee.

**IX. Contents of Messages**

Workers must not use profanity, obscenities, or derogatory remarks in electronic messages discussing employees, customers, competitors, or others. Such remarks—even when made in jest—may create legal problems such as trade libel, defamation of character, or harassment/discrimination claims.

Special caution is warranted because backup and archival copies of electronic mail may actually be more permanent and more readily accessed than traditional paper communications. Therefore, transmission of obscene or harassing messages to any other individual is strictly prohibited.

**X. Message Forwarding**

Recognizing that some information is intended for specific individuals and may not be appropriate for general distribution, electronic communications users should

exercise caution when forwarding messages. LHC's sensitive information must not be forwarded to any party without the prior approval of a supervisor. Blanket forwarding of messages to parties outside LHC is prohibited unless prior permission of the supervisor has been obtained.

**XI. Handling Information About Security**

Users must promptly report all information security alerts, warnings, suspected vulnerabilities, and the like to their supervisor. Users are prohibited from utilizing LHC systems to forward such information to other users, whether the other users are internal or external to LHC.

**XII. Public Representations**

No media advertisement, Internet home page, electronic bulletin board posting, electronic mail message, voice mail message, or any other public representation about LHC may be issued unless it has first been approved by Executive Director, and/or legal counsel prior to usage.





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

**XIII. Harassing or Offensive Materials**

LHC computer and communications systems are not intended to be used for, and must not be used for the exercise of the workers' right to free speech. Sexually explicit words and images, ethnic slurs, racial epithets, religious or political statements or anything else that may be construed as harassment or disparagement of others based on their race, national origin, sex, sexual orientation, age, religious beliefs, or political beliefs may not be displayed or transmitted. Unwanted telephone calls, electronic mail, and internal mail are strictly prohibited and is cause for disciplinary action including termination. Users are encouraged to respond directly to the originator of offensive electronic mail messages, telephone calls, and/or other communications. If the originator does not promptly stop sending offensive messages, Users must report the communications to their supervisor and Human Resources.

LHC retains the right to remove from its information systems any material it views as offensive or potentially illegal.

**XIV. Communication Using Social Media**

Inappropriate communications, even if made on your own time using your own resources, may be grounds for discipline up to and including immediate termination. We encourage staff to use good judgment when communicating via blogs, online chat rooms, networking internet sites, social internet sites, and other electronic and non-electronic forums (collectively "social media"). All employees should be mindful of the content of their electronic communication. If for some reasons you choose to "friend" other LHC employees, understand that LHC's various workplace policies may apply.

The following is a general and non-exhaustive list of guidelines you should keep in mind:

1. Make it clear that the views expressed in social media are yours alone. Do not purport to represent the views of LHC in any fashion.
2. Do not disclose confidential or proprietary information regarding the company, your co-workers or customers. Use of copyrighted or trademarked company information, trade secrets, or other sensitive information may subject you to legal



419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

action. If you have any doubt about whether it is proper to disclose information, please discuss it with your manager.

3. Do not disclose information that could subject the company to legal liability. Data about certain financial transactions, confidential information as described by the U. S. Department of Housing and Urban Development, information about medical and health records, and other disclosures may be restricted by state or federal laws. If LHC is subjected to government investigation or financial liability based on your disclosures, the company may seek to hold you personally responsible.
4. Do not use LHC logos, trademarks, or other symbols in social media. You may not use the company name to endorse, promote, denigrate or otherwise comment on any product, opinion, cause or person.
5. Be respectful of the privacy and dignity of your co-workers and LHC clients. Do not use or post photos of co-workers without their express consent and do not post the same for clients under any circumstances.
6. Harassing, obscene, defamatory, threatening, or other offensive content must be avoided. Harassing or discriminatory comments, particularly if made on the basis of gender, race, religion, age, national origin, or other protected characteristic, may be deemed inappropriate even if the company name is not mentioned. If social media communications in any way may adversely affect your relationships at work or violate LHC policy, you may be subject to discipline up to and including immediate termination.
7. Ensure that engaging in social media does not interfere with your work commitments.
8. Whether a LHC employee opts to create or participate in social media sites for personal reasons is his/her own decision. "Personal" use of social media is any participation that is not authorized by LHC.
9. Your use of social media sites through LHC equipment must be job-related for an approved social media application/project. Accessing personal social media site accounts from a LHC computer during your work time is strictly forbidden.





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2012-1  
Electronic Communication/Social Media Policy**

---

While generally what you do on your own time is not LHC's concern, anything you post will ultimately be your responsibility. Your personal online communications are individual interactions, not LHC communications. If you choose to participate in a social media site, please exercise sound judgment and common sense.

Violations of this Policy may result in discipline up to and including dismissal





COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**October 25, 2017**

**Lansing Housing Commission  
Lansing, Michigan**

**HONORABLE MEMBERS IN SESSION:**

**SUBJECT:**

**Approval of Policy No. 2017-1, Davis-Bacon and Related Acts Compliance Policy -  
Resolutions No. 1284**

**RECOMMENDATION:**

Staff recommends Approval of Resolution No.1284, which adopts LHC's Davis Bacon and Related Acts Compliance Policy No. 2017-1.

**CONTACT PERSON:**

Martell Armstrong  
Executive Director  
(517) 487-6550 X 111

**SUMMARY:**

The Davis-Bacon Act requires the payment of prevailing wage rates to all laborers and mechanics on Federal government construction projects in excess of \$2,000. Construction includes alteration and/or repair, including painting and decorating of public buildings or public works.

**BACKGROUND**

Whenever Davis-Bacon provisions are triggered by any procurement action taken by this Agency, specific protocols will be taken to guarantee agency compliance with Federal regulation.

The Davis-Bacon Act requires the payment of prevailing wage rates to all laborers and mechanics on Federal government construction projects more than \$2,000. Construction includes alteration and/or repair, including painting and decorating of public buildings or public works. Documents used in preparing this policy include: Title 29 CFR Parts 1,3,5,6 and 7, the January 2012 Davis-Bacon Labor Standards A Contractor's Guide to Prevailing Wage Requirements for Federally-





COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

Assisted Construction Projects, the Davis-Bacon and Related Acts Power Point provided by HUD Labor Relations Specialist Deborah Diez, and the PHA FLSA Davis-Bacon Checklist Form

**FINANCIAL CONSIDERATIONS:**

There are no financial considerations.

**POLICY CONSIDERATIONS:**

One of the major governance responsibilities of the Board is to set policy for LHC. This policy is consistent with industry standards. It provides reasonable guidelines for providing high quality customer service and defines the level of customer service the public can expect from LHC staff.

Respectfully Submitted,

Martell Armstrong, Secretary to the Board  
Lansing Housing Commission





COMMISSION 419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Resolution No. 1284**

Adopted By the Lansing Housing Commission

October 25, 2017

**BE IT RESOLVED BY THE LANSING HOUSING COMMISSION:**

Martell V. Armstrong, acting in the capacity of Executive Director, is authorized to immediately administer Lansing Housing Commission's Davis Bacon and Related Acts Compliance Policy.


  
Chair

Yeas 4

Nays 0

Abstentions 0

Attest:

  
Secretary

For Clerk Use Only

Resolution No. 1284  
Date Adopted 10/25/2017







419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2017-1  
Davis-Bacon and Related Acts Compliance Policy**

---

**Overview**

This policy is based on regulatory requirements highlighted in Title 29 CFR Parts 1,3,5,6 and 7 and is designed to ensure provide guidance on the process of reviewing bid documents, contracts, and payrolls on projects subject to Davis Bacon. This policy will be provided to all interested bidders at the pre-construction conference or as part of the procurement bid packet. A copy of the Contractor's Guide to Prevailing Wage Requirements for Federally-Assisted Construction Projects will also be provided to all successful bidders at the Contract Signing.

**Pre-Construction and Bidding**

Whenever Davis-Bacon provisions are triggered by any procurement action taken by this Agency, specific protocols will be taken to guarantee agency compliance with Federal regulation.

The Davis-Bacon Act requires the payment of prevailing wage rates to all laborers and mechanics on Federal government construction projects in excess of \$2,000. Construction includes alteration and/or repair, including painting and decorating of public buildings or public works.

Once a contract is determined to be subject to Davis-Bacon labor standards requirements, certain documents must be included in the contract document(s). These documents include HUD-5370, General Conditions of the Contract for Construction or the HUD-5370-EZ (construction contracts ≤\$100,000) which are used for Public and Indian Housing projects. The above Labor Standards Provisions and the applicable wage decision will be included in the specifications associated with the contract and attached to and made a part of the contract document(s). Labor standards clauses describe the responsibilities of the contractor concerning Davis-Bacon wages and obligate the contractor to comply with the labor requirements.

The labor standards clauses also provide for remedies in the event of violations, including withholding from payments due to the contractor to ensure the payment of wages or liquidated damages which may be found due. Most importantly the Labor Standards Provisions stipulate that any Contractor or subcontractor shall insert in any subcontracts all the provisions contained in this clause, and such other clauses as HUD or its designee may by appropriate instructions require, and also a clause requiring the subcontractors to include these provisions in any lower tier subcontracts. These forms and other HUD program labor standards forms are available on-line at [www.hud.gov/offices/adm/hudclips/index.cfm](http://www.hud.gov/offices/adm/hudclips/index.cfm).



419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2017-1  
Davis-Bacon and Related Acts Compliance Policy**

---

Davis-Bacon Wage Decisions or wage determinations, list various construction work classifications, and include the minimum wage rates and possibly fringe benefits for persons working within those classifications. These wage and fringe benefit rates are the minimum rates that must be paid to persons working under those classifications. LHA will require all prospective bidders to complete the Project Wage Rate Sheet HUD-4720 and the Contractor Profile Form as part of their bid submission packet. The Project Wage Rate Sheet HUD-4720 will identify all work classifications from the applicable wage decision the contractor intends to utilize for the project. The contractor will list the wage and fringe associated with the applicable work classifications. If additional classification(s) are needed the bidder must identify those classifications at the time the bid is submitted. Lansing Housing Authority (LHA) will provide the bidders with the additional classification process and the HUD 4230A Report of Additional Classification and Rate form. The contractor that is awarded the contract will complete and submit the HUD 4230A Report of Additional Classification and Rate with a letter on company letterhead to LHA stating the missing work classification, requested rate, fringe and work description. The above documents will be processed by LHA and sent via email to the HUD Ohio Labor Relations Specialist PRIOR to allowing persons with that classification to work on the project covered under the contract. Any Change Orders necessary as a result of increased wages as a result of obtaining a new classification for the project will be completed after the new classification is obtained from the HUD Labor Relations Specialist and submitted to Lansing HA. LHA will provide guidance on making the request if necessary, but the request and all documentation associated with the request must be made by the contractor using the classification.

**Contracting**

LHA will require the Principal or General Contractor to complete the Contractor Profile form at contract signing/award. The Principal or General Contractor on the project will be required to identify any subcontractor at the time of bid and will not be authorized to use subcontractors on the project until all contractual screening and compliance is determined for the subcontractors. This includes verifying eligibility at [www.sam.gov](http://www.sam.gov).

The eligibility will be printed from the website and maintained in the project file per regulation. LHA will provide a copy of the packet to the contractors and will retain the original.

**Additionally, the Principal or General Contractor will provide LHA with an original signed copy of any sub contracts that are entered into.** This will allow LHA to review the payrolls effectively as they will know the scope of work/job classifications that should be used on the project.





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2017-1  
Davis-Bacon and Related Acts Compliance Policy**

---

**Compliance**

It is the responsibility of the Principal or General Contractor to maintain full compliance with the labor standards provisions applicable to the project. The Principal or General contractor will be responsible for posting a copy of the wage decision or the Project Wage Rate Sheet at the job site. The Principal or General Contractor must also post the DOL Davis-Bacon poster title Employee Rights under the Davis-Bacon Act (Form WH-1321) with LHA and HUD contact information included at the job site. These postings must be made in a location that is visually accessible to all employees and where the documents will not be destroyed by the elements such as wind, rain or snow. LHA will check to make sure these documents are at the job site.

All Principal or General Contractors will be required to submit a weekly certified payroll report (CPR) beginning with the first week that the company works on the project. Weekly payroll reports will be required for submission every week afterward until the firm has completed the work. All subcontracts will be required to follow this same guidance.

Payrolls must be submitted on the DOL WH-347 Payroll form. The payrolls must be certified using the payroll certification found on the WH-347, and the certifications must be made by the individual(s) listed as authorized on the Contractor Profile Form.

If there are breaks in the work periods for either the Principal/General Contractor or a Subcontractor, "no work" payrolls can be provided, or a signed document stating the company is currently in "no work" status on the project, including a date when they expect to return to the job site may be submitted to the LHA. LHA will note the expected date of return and will monitor the job site to confirm when regular WH-347 Payroll Forms should be expected.

The Principal/General Contractor is responsible for reviewing the subcontractor's payroll reports for compliance prior to submitting the reports to LHA. This compliance includes making sure the job classifications match the work being completed on site.

Each Principal/General Contractor is responsible for compliance of their subcontractor(s). Each Principal/General Contractor and each Subcontractor must retain complete sets of their own payrolls and other basic records such as employee addresses and full SSNs, time cards, tax records, evidence of fringe benefit payments for all Davis-Bacon projects for three years following completion of the project and submission of the final payroll.

The Prime Contractor is responsible for their own records and the subcontractor records under this provision.



419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2017-1  
Davis-Bacon and Related Acts Compliance Policy**

---

LHA will review each payroll report for compliance within 48 hours of submission of the report, on a weekly basis. All payroll reports will be date and time stamped at the time of submission.

**LHA will review to determine**

- That the contractor and subcontractor information is complete with name and address, project name and number and the week ending date. **LHA will require the numbering of all payrolls.**
- That the payroll report does not include employee addresses or full SSN's. All payrolls must include the employee's name and the last four digits of the SSN.
- That the work classification and corresponding wage and fringe benefit payment are in compliance with the applicable wage decision
- That any apprentice or trainee noted on a payroll report has submitted the appropriate apprenticeship certification in a registered DOL or a DOL recognized State Apprenticeship Council (SAC) program. Additionally, the apprentices and trainees need to submit the wage schedule and ratio information from the corresponding program.
- That any employee being paid under a split classification is listed separately on the payrolls and is classified correctly and paid under the appropriate wage and fringe classification
- That the hours worked include only regular and overtime hours worked on the project covered under the LHA contract, and that the report shows both the daily and weekly hours for each employee. Any hours worked at another job site should not be reported on the payroll submitted to LHA.
- That the gross wages earned is listed on the report
- That all deductions from gross earnings are listed and that those deductions have been appropriately identified with documentation submitted that the deduction is required by law or an order of a proper authority or by authorization of the employee, **child support and loan repayment documents are required.**
- That the net pay is listed.
- Overtime hours over 40 hours in a work week will be checked to make sure the calculation is 1 ½ times the rate plus the fringe.





419 Cherry St., Lansing, MI 48933 Telephone: (517) 487-6550 Fax: (517) 487-6977

**Lansing Housing Commission  
Policy No. 2017-1  
Davis-Bacon and Related Acts Compliance Policy**

---

- That the Statement of Compliance is completed and the boxes 4a or 4b are checked, with any explanation provided in 4c.
- The payroll must have an original ink signature by the authorized signatory notated on the Contractor profile form

LHA will also complete on-site compliance reviews by visiting the job site and recording the interviews with the employees on the HUD-11 form. LHA will attempt to interview all employees listed on the wage reports. LHA will compare the HUD-11 forms to the payroll reports submitted to-date within 48 hours of receiving the HUD-11 forms so that discrepancies can be addressed.

LHA will contact the Principal/General Contractor to resolve any payroll errors on the weekly payroll forms at the time of the review. LHA will notify the HUD Labor Relations Specialist assigned to the agency if discrepancies are noted and not resolved within a reasonable (7 – 10 days of notification to the Principal/General Contractor). Documentation of the notification and subsequent activity related to resolving the discrepancy will be maintained by the LHA.