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Personal Comments on the Proposed Rule HPD Rules
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Thank you for holding these hearings and listening to residents of Mitchell-Lama developments. We all want rules that reflect and encourage 'Best Practices". We want rules that can be supported by our Managers and improve the lives of our residents.

Consultation with Residents:

HPD needs to institute an ongoing procedure to consult with residents about rules governing their homes.

Respect PHFL and HPD Rules and Regulations:

I support HPD's standard of requiring all Mitchell-Lama housing company employees and managing agents to act lawfully and respect HPD rules and regulations. My concern is for employees that are not governed by grievance procedures and employment protections. Unfortunately, it is easy to blame the lowest paid employee and have them suffer consequences for mistakes and poor judgement of their supervisors.

Posting of contracts, Minutes and documents:

I commend the requirement that contracts for services, construction and repairs as well as retainer agreements be publicly posted and available to shareholders. I also approve of the inclusion of Minutes of Board of Director meetings to this list of public information. It is important that Board decisions and minutes be posted so that shareholders have information and thus can be intelligently involved in the work of the community. A successful cooperative requires transparency for it to function effectively. Boards should operate out in the open. Please add to this requirement that all votes on motions and resolutions be posted as well as the names of votes of the Board members. Their work should be transparent. For those shareholders without computers and internet access these documents need to be available in print.

Websites:

It is forward looking of **HPD to require developments to set up websites** for the dissemination of information. A building website enables the public posting of contracts, corporate By-Laws, Minutes of Board Meetings, posting of amenity wait lists, internal transfer lists, building procedures during COVID pandemic, candidate resumes. It is easier to point residents to the website for announcements and to read these notices from a screen than having many sheets of paper flapping around the lobby walls. In addition, the on site Management Office needs to make available paper copies of these documents and announcements for shareholders without internet access.

Voting procedures and elections:

I support HPD's goal of bringing impartiality, transparency and timeliness to elections and votes in Mitchell-Lama cooperatives. The overriding issue is **confidence in our voting procedures and involvement of all shareholders.**

Shareholders need to be confident that every ballot is from a resident that actually lives in their in the developments. We need to discourage absentee shareholders that are holding on to the apartment in anticipation of privatization.	Conduct an audit of primary residence prior to the elections with regular frequency. MAIL ballots and proxies ONLY to residents at their primary residence. DO NOT MAIL BALLOTS OR PROXIES TO ALTERNATE ADDRESS.
We need procedures to confirm each voter's eligibility.	Require shareholders present photo ID.
We need to protect the anonymity of each ballot and the secrecy of each vote.	Double envelope method is best way to count and control ballots and their distribution. Excellent method to maintain anonymity and secrecy of ballot.
We need procedures to allow a review and recount of the ballots.	Require paper trail with digital voting.
We need methods to prevent intimidation of voters and harvesting of ballots.	DO NOT ALLOW BOARD DIRECTORS OR MANAGEMENT EMPLOYEES to be involved in any part of the voting procedures. Board members may not collect ballots.
We need to bring transparency to the whole vote process and allow shareholders to observe on-site vote counting.	Develop virtual options to allow residents to observe ballot counting.

MORATORIUM ON PRIVATIZATION DURING COVID PANDEMIC:

Please add to the rule change on Feasibility Studies and privatization efforts a **moratorium on all privatizations efforts during the COVID pandemic and for a minimum of 12 months after the official end of the pandemic.**

- Mitchell-Lama cooperatives need to be conservative with their operating funds during this stressful time when our residential and commercial tenants are having great difficulty meeting their monthly payments.
- Even though the funds may have been allocated to privatization multifamily buildings are facing unprecedented loss of income, and increases in expenses. Any study completed before the pandemic erupted, or at any time since March 2020, will need to be redone. Their conclusions will be based on speculations about the future of the cooperative and housing markets.