

Comments and Responses to the BHA Federal Annual Plan (April 2026 through March 2027).

The following document contains the comments and responses received on the BHA's Federal FY 2026 Annual Plan. BHA staff met with the Resident Advisory Board from September through December discussing the Plan process and documents and sent copies of the Plan to the RAB and Local Tenant Organizations. The Plans were put out for public comment on November 1, 2025 and the comment period closed on December 15, 2025 with an in-person hearing December 8, 2025 at 11 am at Boston City Hall and at 6 PM the same day a virtual public hearing held on zoom.

The BHA took several steps to notify the public of the Federal Plans and the opportunity to comment. The BHA placed an advertisement in the Boston Globe, included a notice with the rent statement of public housing residents, requested mixed finance partners to share the same notice with their BHA ACC-subsidized tenants, sent a mailing to Leased Housing participants in Boston and nearby towns notifying them of the Public Hearing. The BHA also sent letters to many local officials and advocacy groups. The Plan was made available for review at Boston Public Library Copley Square branch, BHA's headquarters at 52 Chauncy St., and on its website [www.bostonhousing.org](http://www.bostonhousing.org).

Many comments are specific to Plan attachments.

**AP:** Annual Plan template

**S:** Supplement

## **Administration**

Comment: Dear Administrator Bok, for over 30 years, Pine Street Inn (PSI) has partnered with the Boston Housing Authority (BHA) to provide affordable, supportive housing for individuals experiencing homelessness. Since its inception in 1969, PSI has served persons experiencing homelessness in Greater Boston through various responsive, community-based programs and services. As the largest nonprofit housing and homeless services agency in New England, Pine Street Inn provides food, clothing, shelter, day and night-time street-based outreach, access to health care, job training, affordable housing, and other critical resources for over 2,000 individuals each day and night at its 45 locations throughout Metropolitan Boston. PSI's mission is to end homelessness by making permanent housing a reality for all.

Pine Street Inn has successfully developed and operated affordable, permanent housing for individuals experiencing homelessness and various other hardships for over 50 years. PSI has designed housing and housing-based services for persons with disabilities, including mental illness, HIV/AIDS, chronic substance use disorder, dual diagnosis, and mobility limitations. Units meet the complex needs of the hardest-to-serve homeless individuals. With 1,100 units of supportive housing in our portfolio, Pine

Street Inn is a prominent provider in Boston's homeless services Continuum of Care (CoC). PSI also participates in the Consolidated Plan as a developer and provider of affordable supportive housing and street outreach, and is pleased to see the BHA's commitment to the Consolidated Plan. This commitment will enhance the BHA's community partnerships, including Pine Street Inn's Street Homeless Housing project, which provides supportive services to formerly homeless individuals who now reside in BHA housing.

PSI enthusiastically supports the Boston Housing Authority FY2026 Annual Plan. The BHA's new transfer policy in the Admissions and Continued Occupancy Plan (ACOP), which organizes transfer reasons into tiers, will create more streamlined transfer and admissions processes. An efficient, straightforward transfer policy will provide BHA staff with more accurate, up-to-date vacancy information, facilitating new admissions. The simplified transfer policy will also prevent future displacement of households, increasing housing security and improving tenant outcomes.

Additionally, Pine Street Inn commends the BHA's continued inclusion of homeless individuals in priority and preference populations. This policy is incredibly impactful and helps to quickly house the City's most vulnerable constituents. The BHA is one of only a few, if not the only, Housing Authority in Massachusetts with this priority admissions preference, and PSI applauds this leadership. In order to better support individuals experiencing homelessness, PSI urges the BHA to adopt HUD's definition of homelessness. As it currently stands, the BHA's definition does not include individuals exiting an institution where they temporarily resided, such as a correctional or medical facility. HUD's definition of homelessness expands upon the BHA's definition, and its use will create consistency between housing programs in the City, as well as allow the BHA to serve more individuals experiencing homelessness.

PSI also supports the provisions added to the Annual Plan that ensure housing program stability despite funding changes. The BHA has added an enrollment preference to the Housing Choice Voucher Program to include those with expiring Emergency Housing Vouchers in response to the recent changes to the Commonwealth's emergency shelter programs. Additionally, the BHA has introduced incentive payments for landlords to create and renew HUD-VASH leases and established a new exclusion from termination of assistance due to lack of HUD funding, allowing owners to voluntarily reduce contract rents by a percentage each month until sufficient assistance becomes available. These changes demonstrate the BHA's adaptability and commitment to serving those in need, which PSI endorses.

Pine Street Inn is grateful for and appreciative of our ongoing collaboration with the Boston Housing Authority. We hope to continue this collaboration by housing individuals with BHA vouchers in PSI units.

Additionally, we aim to facilitate information sharing between tenants, the BHA, and PSI in order to help tenants retain housing. With the BHA's commitment of essential Section 8 resources, PSI has opened a new affordable housing facility at 900 Morrissey Boulevard, and is currently working to lease its units.

The BHA's 17,676 vouchers are crucial to the availability of affordable housing in Boston. The BHA's knowledgeable staff, essential services, and informed guidance are invaluable. We pledge to work together in partnership with the Boston Housing Authority

to preserve, create, and provide access to affordable housing for people experiencing homelessness.

Response: The Boston Housing Authority appreciates Pine Street Inn's supportive comments and its long-standing partnership with the BHA. We value Pine Street Inn's role in providing affordable and supportive housing for individuals experiencing homelessness and look forward to continuing our collaboration to expand housing stability and opportunity for BHA-assisted households.

Comment: This is a compilation of comments, questions, and notes from Greater Boston Legal Services (GBLS) on the Boston Housing Authority (BHA) draft federal and state annual plans for this coming year. There are obviously some unknowns: BHA has not yet heard from HUD on its proposed Amendment 1 to the current year's plan, and that affects certain aspects of the new proposals. BHA has not yet heard from HUD about substantive comments on a proposed Voluntary Compliance Agreement (VCA) intended to expedite transfers of federal public housing residents with disabilities who need reasonable accommodation and modification. The overall situation with federal funding and policies remains uncertain, given the Fall government shutdown and only short-term agreements in place. That being said, both the BHA and the Commonwealth are to be commended for continuing to rise to the challenge of a very difficult housing market, aging stock, and increased market unaffordability in a time of great uncertainty, and for posting significant gains in performance. BHA cannot rest on this, however. BHA can and should do better in a number of areas and should engage residents and partners to share achievements and remain open to constructive criticism and feedback.

Response: The Boston Housing Authority appreciates the thoughtful comments and ongoing engagement from Greater Boston Legal Services. BHA has received approval on the plan amendment submitted in Sept 2025. The BHA acknowledges the uncertainty related to HUD review of the status of the Voluntary Compliance Agreement, and the broader federal funding environment. Despite these uncertainties, the BHA remains committed to continuous improvement, resident engagement, and compliance with all applicable federal and state requirements. The BHA will continue to work collaboratively with residents, advocates, and partners to address challenges, share progress, and incorporate constructive feedback where feasible.

Comment: S. Designated Housing for Elderly and Disabled Families (pp. 82- 84)  
The current Designated Housing Plan (DHP) extends until March 2027, and BHA will need to submit any new or revised DHP prior to the end of the new PHA Plan year. As noted in the global comments above, there is some concern here about the elimination of the Mitigation Vouchers and how this may impact housing opportunities for non-elderly disabled applicants. In addition, if changes are made affecting the number of Continuum of Care/Permanent Supportive Housing units available in Boston, this impacts the analysis relied upon for the DHP. BHA, the City, and stakeholders working with affected constituencies should confer to discuss appropriate strategies.

Response: The BHA acknowledges that the current Designated Housing Plan extends through March 2027 and recognizes the importance of advance planning for any future revisions. The BHA will comply with HUD requirements regarding submission of any new or revised Designated Housing Plan prior to the expiration of the current plan. The BHA is aware of concerns related to the elimination of Mitigation Vouchers and potential impacts on non-elderly disabled applicants. Any future changes to designated housing, mitigation strategies, or Continuum of Care resources will be evaluated in coordination with the City of Boston and relevant stakeholders to ensure continued access to housing opportunities for affected populations.

Comment: S. BHA Organizational Chart (p. 94)

As usual, this is a very interesting (and useful) chart. There are some blank spots and if they have been filled prior to submission, the chart should be updated. It would be helpful to have discussions regarding it with the RAB as a whole at a time during the year when there is open time on the agenda, which could include introducing certain BHA staff (such as the new Director of Resident Services).

Response: The BHA appreciates the feedback regarding the Organizational Chart. The BHA agrees that opportunities for discussion with the Resident Advisory Board regarding organizational structure and leadership roles are valuable and will continue to engage the RAB throughout the year as schedules and agendas permit.

## **Admissions**

Comment: S. A. Supplement to Federal PHA Plan Section B. 1 (Original Plan Elements) Need/Strategies (pp. 2-11)

As GBLS has noted for a number of years now, 11% of the population eligible for admission to BHA programs are Asian. However, this group is under-represented in the applicant pool for both Section 8 (2.9%) and public housing (6.9%). BHA had said that it was going to study whether the priority system that it used might adversely affect housing opportunities for Asian applicants versus other groups. When will BHA report out any conclusions/action on this?

Response: The Boston Housing Authority acknowledges the concern regarding the under-representation of Asian applicants in both Section 8 and public housing. We aim to ensure that all eligible applicants have equal access to housing opportunities.

Comment: S. On p 5, reference to Mitigation Vouchers has been eliminated (see also p. 22). It would help to discuss why this change is made, particularly where the existing Designated Housing Plan (DHP) hasn't yet been revised/renewed and references Mitigation Vouchers as part of the strategy to address the housing opportunities of non-

elderly disabled applicants. If the issue is that there are no available Section 8 vouchers (due to subsidy shortfall), then should the strategy for housing non-elderly disabled applicants change? If the Continuum of Care and Permanent Supportive Housing provided through the City for this population is also vulnerable due to policy changes being considered, it would make sense for BHA and the City (working with other stakeholders) to confer and discuss what actions are appropriate.

Response: Mitigation Voucher references were eliminated because the number of vouchers issued and time frame had both been fulfilled.

Comment: S. On p. 14, BHA added to Mixed Finance list Eva White, Amory Street, West Newton Street, Whittier Street, Lenox/Camden & Orient Heights, as well as the existing list of the HOPE VI sites, Franklin Hill, and Old Colony. Should this also include the new Mixed Finance Charlestown and Hailey units, as well as J.J. Carroll? Not all of these sites have public housing units where the developer operates the waiting lists (we believe this is so at Orchard Gardens, Maverick, Washington Beech, Franklin Hill, Old Colony, and Orient Heights, but not others who no longer have public housing units or where the public housing units are still administered by the BHA). It would help to clarify this description.

Response: Thank you for your comment. We will update the Mixed Finance list to include the Charlestown and Hailey units, as well as J.J. Carroll.

### **Admissions including ACOP transfer policy**

Comment: To Whom It May Concern: Disability Law Center (“DLC”) writes to provide public comment on Boston Housing Authority’s (“BHA”) Draft Federal FY 2026-27 Annual Plan. DLC is the designated Protection and Advocacy (P&A) system for Massachusetts, with a federal mandate to provide advocacy and legal services, and to engage in systemic efforts to protect and enhance the rights and independence of individuals with disabilities throughout the state. The focus of these comments is primarily on the proposed changes to the Admissions and Continuing Occupancy Policy’s (“ACOP”) new transfer categories contained in Chapter 7.

DLC appreciates that BHA is making changes to the ACOP’s transfer categories to expedite reasonable accommodation transfers, which have historically taken months to years to fulfill. We understand that tackling the backlog of reasonable accommodation transfers will take time, and we would welcome the opportunity to participate in meetings with BHA and the legal services community on this and other disability-related issues. These comments are offered in the spirit of highlighting some potential challenges to implementing the proposed ACOP changes as drafted.

1) The proposed ACOP has too many different transfer categories and types. The proposed ACOP has four (4) different transfer categories and a total of fifteen (15) different transfer types. The new categories include three (3) different types of “Administrative Transfer:” T1, T2, and T3, with the remainder of transfers falling into the “Special Circumstances” category.

We suggest simplifying the transfer categories into just “Administrative” and “Special Circumstances” categories. The potential for confusion is high with three separate types of Administrative Transfer. We understand that BHA will assign different points to each type of Administrative Transfer but do not see the need to divide the category into three parts. Administrative transfers could simply be numbered sequentially, as in “A1” for domestic violence, “A2” for medical condition, etc.

Consolidating the transfer categories into Administrative and Special Circumstances would also allow BHA to reduce the overall number of transfer types. Simply put, there are too many different types of transfers with the proposed changes, which will doubtless lead to confusion among front line staff and residents submitting transfer requests. For example, the difference between a “Medical Condition” transfer [T1(b)] and a “Reasonable Accommodation” transfer [T3(b)] is not completely clear. Nor is there an obvious difference between a T1(a) “Domestic Violence” transfer and a T3(a) “Domestic Violence” transfer, or an “Over-Under Housed” transfer under T2(f) vs. “Over-Under Housed” transfer under Special Circumstances (b). Anything BHA can do to reduce the number of transfer types should be helpful if it does not come at the expense of residents’ civil rights and safety.

Response: Thank you for your comments. HUD advised us to review transfer policies from other housing authorities. After comparing approaches, we established three transfer tiers to reflect the varying severity of emergencies. The tiers correspond to the urgency of each transfer.

Comment: “Life-threatening”/“dire circumstances” should not be the standard for Medical and Reasonable Accommodation Transfers.

With the understanding that the goal of the proposed ACOP changes is to expedite reasonable accommodation transfers, DLC recommends removing the “dire circumstances” and “life threatening” language from Chapter 7’s transfer types. The proposed ACOP defines T1(b) “Medical” transfers for a “condition [that] is life threatening or a condition not qualifying as life-threatening that can be alleviated and/or substantially improved only by relocation to another apartment” (pg. 84, emphasis added). This definition is confusing as it unravels on its own terms (either something is life threatening and warrants a T1(b) transfer or it is not and would presumably require a less-urgent type of transfer). The ACOP defines T3(b) “Reasonable Accommodation” transfers as addressing “dire circumstances posing serious and direct threat to health, life or safety which can only be alleviated by relocation to another apartment” (pg. 87, emphasis added).

BHA residents are entitled to a disability-based transfer when it is necessary to provide an equal opportunity to use and enjoy their dwelling. There is no requirement in federal

law related to life-threatening conditions or dire circumstances, and it not clear on what basis BHA relies to impose these requirements for granting a transfer request. If BHA wishes to differentiate among the various types of medical/disability-based transfers, we suggest eliminating the category “Medical” transfer and using one transfer type, “Reasonable Accommodation” transfer, with priority 1 for urgent situations, such as inability to climb the stairs to one’s unit, and priority 2 for less time-sensitive issues, such as qualifying for an extra bedroom to store medical equipment. The distinctions between priority 1 and 2 may take some time to work out, and we trust that BHA would provide updates on implementation to the disability and legal services community.

Response: Thank you for your comments. We will give this careful consideration.

Comment: DLC supports the comments on transfers submitted by Greater Boston Legal Services. DLC supports the comments from Greater Boston Legal Services (“GBLS”) on the proposed changes to the ACOP’s transfer procedures related to reasonable accommodation transfers. We support the idea of treating the 500+ approved transfer applicant backlog as a special class, with enhanced procedural protections given the amount of time many households on the list have had to wait for a unit offer, rather than a waitlist to be purged, as GBLS noted. We encourage BHA to communicate effectively on options and timelines with reasonable accommodation transfer waitlist households, as well as to readily offer reinstatement for households who are dropped for failing to respond to form letters and requests for updated verifications.

Response: Thank you for your comments.

Comment: BHA should continue its progress turning over units quickly and leasing them up in a timely manner.

Aside from BHA’s ongoing obligation to house new applicants from its waiting lists, perhaps the single biggest factor in addressing the backlog of reasonable accommodation and other transfers is the unit turnover and lease-up rate. While BHA has made great progress in reducing its unit turnover time over the past decade, there is still more work to be done to get lease-up time closer to HUD’s Grade A standard of less than 20 days. Publicly available data from BHA’s’ 2026 Annual Plan indicates BHA’s turnover time is 34 days, and its lease-up time is 89 days. As it moves forward with implementing the changes to its transfer process, BHA should set clear goals for unit turnover/lease-up time for RA transfers and provide regular updates, outside of the annual plan process, on how it is doing.

Response: Thank you for your comments. We’re committed to providing ongoing updates throughout the implementation of the transfer policy changes.

Comment: BHA should update ACOP language related to disability using “person-first” language.

The draft ACOP contains numerous references to “handicap” and “handicapped” individuals. These terms have fallen out of favor and are now considered offensive to many. With the understanding that some of the references to “handicap” and “handicapped” directly relate to state statutes that need to be updated, we recommend removing these terms wherever possible to reflect modern standards of “person-first” language (see, e.g., pgs. 1, 2, 10, 32, 88, 91, 129, 135, 136, and 139). For example, say “person with a disability,” rather than “handicapped person.”

Thank you for the opportunity to provide input on this matter.

Response: Thank you for your comments. Made edits where possible.

Comment: Proposed Changes, Public Housing Admissions and Continued Occupancy Policy (ACOP) In commenting here, we thought it best to not just go in chronological order with line edits, but to list a set of concerns/recommendations. We have added notes where this may be helpful. Transfer Policy

a/ We Agree that Existing Tenants With Priority Transfer Needs (Such as Related to Reasonable Accommodation for a Disability, Domestic Violence, or Uninhabitability) Should Get More Expedited Treatment By BHA. One problem that BHA has had throughout its history is that transfer applicants with emergency needs are not sufficiently prioritized given the pressure to admit new applicants. Transfers do require more work—an apartment must be ready for the transfer to move into, and then the unit that the transferee left must similarly be prepared (either for another transfer applicant or a new admission). But HUD’s recent Voluntary Compliance Agreement (VCA), resulting from the complaint of a disabled tenant that they were languishing in the system while awaiting a transfer as a reasonable accommodation, changes this. It permits BHA to offer hope to those who’ve waited too long in units that are simply not suitable for their needs and where continued occupancy poses an ongoing health-safety risk due to fear of violence/abuse, inaccessibility, or other severe hardship.

As BHA has described it, there are over 500 Emergency Transfers in its system. Many of these are related to domestic violence or reasonable accommodation needs. It is not clear how long it would take BHA to clear that backlog—and then what would be a realistic time-frame, going forward, for a family newly identifying a need for emergency transfer to get relief. Obviously, this can vary—a family needing a large unit with wheelchair accessibility and only a limited range of acceptable offers will have to wait longer for an appropriate offer than a family able to accept offers in a wide range of neighborhoods whose needed unit size/features are readily available. It is also not clear where these transfer requests sit in the system, how old or incomplete the data may be for a number of requests, and whether current circumstances that might restrict the range of assignments have been identified.

Response: Thank you for your comments. We have begun a comprehensive review of approved transfers. To keep information current and accurate, we are creating a periodic update notification to be sent to all approved transfers to confirm that their information has not changed and remains accurate.



Comment: b/ BHA's Plan Should Deliver Appropriate Relief for the 500 Emergency Transfer Cases, as Well As Subsequent Timely Transfer Relief, and Should Involve Others In Reviewing Its Progress In Tackling This Goal. Presumably the goal of the VCA is for BHA to successfully rehouse the 500 households awaiting emergency transfers into housing which is safe and appropriate for their needs and removes barriers to the full and effective utilization of the BHA housing programs by these families—as well as to ensure that those who are similarly situated in the future get results. Where that is the goal, simply revising point systems and priority categories will not be sufficient. BHA will need to monitor how the revamped system delivers its promises. There may be unanticipated problems and the need to identify and address them promptly. As with similar endeavors in the past, it would be good for BHA to draw in others to help it gain perspective. This was done, for example, when the BHA developed homeless and domestic violence priorities in the 1980's or worked with the City of Boston to identify barriers for homeless individuals and families in negotiating the application and screening process. BHA will also need a good system of tracking how the 500 Emergency Transfers get processed and outcomes. Quarterly reports and meetings could strike an appropriate balance. And BHA should retain some flexibility in its ACOP and Admin Plan so that if unanticipated problems or possible solutions are identified, there is no undue delay in taking appropriate remedial steps.

Response: Thank you for your comments.

Comment: c/ The T1, T2, and T3 Categories Are Confusing. Much of what's listed in the descriptions of T1, T2, and T3 is somewhat confusing and/or redundant, and does not provide clear guidance how cases would be compared/assessed and processed, particularly if a transfer applicant's situation may fit into more than one category. Presumably certain categories will be used in ways that make sense. For example, if it is contemplated that a building will be taken off line for redevelopment within a year, it may make sense to apply T2 status to the families who would need to be temporarily relocated within x period, and then remove those names and only restore them to the T2 list within x period of permanent re-occupancy. For a household that lives in an apartment with accessibility features but no longer needs those features, there needs to be a clear mechanism to then assign that unit to the highest ranked emergency transfer applicant who requires those features in a unit of that size (and where there would be no "good cause" basis to deny the transfer).

One concern arises because T3 is always ranked below T2, and many domestic violence and reasonable accommodation cases appear to be within T3 and this may not be the right weighting. Obviously, there may be cases where placing a tenant with an uninhabitable unit makes sense (such as a public housing tenant displaced by a fire or natural disaster), but the language is broad enough so it might appear that tenants would simply be placed under T2 due to being over- or under-housed, and there are T3 domestic violence or reasonable accommodation cases with much higher risk.

Response: Thank you for comment. T1 and T2 ranked transfers are reserved for severe cases or required transfers (e.g. redevelopment) and must be identified and approved

either by the Administrator or a Senior Staff member. These transfers are not expected to constitute the majority of cases. T3 transfers, which cover all approved reasonable accommodations and domestic violence cases, will comprise the bulk of transfers. No new admission will proceed until all RA and DV transfers have been appropriately addressed. Additionally, added new T2 category to address transfers for households who no longer need an apartment with accessibility features – see 7.1.2 Administrative T2 Transfer (g).

Comment: d/As Drafted, It Appears that Reasonable Accommodation or Domestic Violence Transfer Needs Either Must Be Dire/Immediate or They Get Little Value, and That Doesn't Appear to be Consistent with the Goal of the VCA to Expedite the 500 Emergency Transfers. One reading of the ACOP is that Reasonable Accommodation or Domestic Violence transfers either fit within T1-T3, or they are of very little value in terms of the point system. While we recognize that some cases are more dire and require a more rapid response (as families are placed in life-threatening risk), there are many other situations where moving the cases along expeditiously, although not as rapidly, will be key to resident health, safety, and stability. Many persons with disabilities will have verifications showing how particular transfers will permit them to fully enjoy the program which they cannot do at present. While a survivor whose abuser has been released is at more imminent risk, that does not mean that the survivor anticipating a release of the abuser in 3-4 months should be ignored. It should be possible to address these 2nd tier matters after T1-T3 needs are addressed.

Response: Thank you for your comment. As noted previously, T1 and T2 require approval by higher management and will not represent the highest volume of transfers. T1 and T2 are evaluated based on the severity of the case. T3 includes all RA and DV transfers and we anticipate to be the bulk of transfers.

Comment: e/ For T1, There Should Be Regular Reporting About How This Category Is Used. One concern with T1 is that it is fairly broad and gives the Administrator a wide range of discretion to expedite certain transfers. But this is essentially unreviewable. BHA staff acknowledged (at a December 1 meeting with RAB members) that T1 operates essentially as a waiver, and it would be hard to grieve a decision that the Administrator granted or did not accord T1 status in particular cases. Staff noted that at present, the category is rarely used – perhaps 4-5 cases per year are processed in this manner. But nothing in the ACOP says that. In the past, wide use of unreviewable discretion in tenant selection has led to abuse, such as favoring particular groups/constituencies or those who know how to access decisionmakers. Given BHA's indication that T1 will be used sparingly to address crises that cannot be addressed through normal cycles, the most important thing here may be to periodically review any new cases that were processed in that manner and what the circumstances were that led to their use. This is the approach HUD uses with regulatory waivers as applied to individual compelling cases. Reviews could be incorporated into the quarterly reports and meetings discussed in F(1)b above.

Response: Thank you for your comments. We will monitor both T1 and T2 transfers and conduct periodic reviews of the transfer processes. This information will help us determine whether adjustments are needed to ensure transfer are addressed fairly.

Comment: f/ BHA Should Reach Emergency Transfer Applicants Where They Are and Avoid Churning. A major concern is that in the press to resolve Emergency Transfers, real people will be ignored. Many of the 500 cases may have old or incomplete information and may not be accurate regarding unit size/feature needs as well as any limitations on acceptable assignments for good cause. Transfer applicants who don't quickly respond to notices seeking updates or offering units may end up being purged and then must reapply and have long periods before returning to the top of waiting lists. Some may have limited literacy, or be persons of limited English proficiency, or may be at work during the day (there may be a question whether after-hours information can be communicated by text or email, for those who have that capacity). It does no one any good if the net result of concentrated efforts is merely purged waiting lists. While we understand that BHA will need to apply some rules of reason (particularly as there are many others in need), and there is limited staffing capacity, BHA should consider how its recently enhanced tenant communication mechanics and technology can be used to make this work well. In addition, if the reason someone was removed was related to disability, limited English proficiency, or domestic violence, BHA should provide for reinstatement once the transfer applicant responds and explains what occurred.

Response: Thank you for your comments. We have begun a comprehensive review of approved transfers. To keep information current and accurate, we are creating a periodic update notification to be sent to all approved transfers to confirm that their information has not changed and remains accurate. We will collaborate with all families who may face barriers to ensure they are given equal opportunity and that each transfer applicants receives the appropriate housing they need.

Comment: g/ Confusing Treatment of Domestic Violence Transfers. There is some confusion about why domestic violence transfers are listed both under T1 and T3. The only difference here seems to be allowing for the issuance of a tenant-based voucher or placement on the PBV list, and the removal of a household from the public housing transfer list if this occurs. However, wouldn't that also be true for a T1 transfer—or are only T3 domestic violence transfers given the opportunity for a voucher? If so, how does BHA decide which domestic violence transfers are T1 and which are T3? Households should also not be removed from the Administrative Transfer list (whether T1 or T3) until they have actually been successfully placed elsewhere. The provision of housing search help (as included here) is helpful, but sometimes the household is not able to successfully lease up.

Response: Thank you for your comments. T1 transfers list potential reasons for transfer (but not limited to) which require immediate action. If a T1 transfer is approved, immediate action is required; if a suitable unit is not readily available, the administrator may recommend super priority for a mobile voucher or placement on the PBV waiting

list. We agree that a household should not be removed from administrative transfer until they have been successfully and appropriately housed.

Comment: h/ Those With Administrative Transfers Should Be Notified of Whether BHA Will Provide Relocation Assistance, and Should Receive Notices of Rights To Dispute Some Aspect of the Transfer. It is important to outline when BHA will provide relocation assistance with the transfer (either help the family move or reimburse for reasonable moving costs) and when the costs of relocation will be on the family. In any notice of planned transfer, the written transfer notice should include notice of the opportunity to request a private conference or utilize the grievance procedure if the resident believes the transfer to be in error (for example, the household should have been exempted from transfer, should not have been offered a unit at a particular site for good cause, or should have qualified for an exception to a unit size standard (such as in cases of reasonable accommodation)).

Response: Thank you for your comments.

Comment: i/ If There Are Different Policies Being Applied at Redevelopment Sites, They Should Be Spelled Out. The section on Capital Improvement in the Transfer Policy references BHA's Residential Relocation and Rehousing Policy, which doesn't seem to appear on BHA's website. (It is an item which GBLS is familiar with from prior PHA Plans, including one for FY 2017.) We note that, based on the experiences of certain clients, BHA does not seem to follow the specific transfer procedures set forth in the ACOP in public housing sites undergoing redevelopment. If BHA uses different policies or procedures in sites undergoing redevelopment – for example, if it does not effectuate transfers needed to make units with adapted features available to residents who are awaiting a transfer based on reasonable accommodation – BHA should make this clear within the ACOP. According to the ACOP (p. 91), "The rejection of transfers related to redevelopment are covered under BHA's Residential Relocation & Rehousing Policy." However, BHA's head of Planning, Construction and Development notified GBLS on 12/5/2025 that this policy "does not (and has not) applied to BHA redevelopment efforts."

Response: The ACOP has been updated to remove the reference. All transfers are at the resident's expense, except those required by capital improvement/redevelopment programs. Refer to the specific relocation plans for each development.

Comment: j/ Priority Transfer from PBV to Public Housing Should Include Some Other Situations. There is some discussion of revision to Section 4.4.2 of the ACOP but this may be worth further thought. The ACOP gives Super Priority status (75 points) to, among others, families in PBV units where BHA determines that they are in wrong-sized units or in units with accessibility features no longer required by the family (and others need those features). Should there not be a similar priority for families in PBV units who need a transfer as a reasonable accommodation, and a unit with the needed features is not available in their PBV site? Similarly, shouldn't there be a priority for PBV families who need to relocate for VAWA-related reasons?

Response: Thank you for your comments. Language was added to allow PBV families super priority for a wrong-sized unit or a unit with accessibility features no longer required by the family due to regulatory requirements. We recognize the potential need to extend similar priority for PBV households who require a transfer as a RA or DV and will consider this. At present, however, we believe it is important to address the large number of emergency transfers within our own public housing units as a priority. We are willing to reconsider once we have sufficiently reduced the backlog of public housing transfers.

Comment: 2. Residual Tenancy Policy: BHA last revamped its Residual Tenancy Policy in 2018-2019. While there is at least one positive aspect to the changes proposed this year, we would recommend BHA reconsider certain aspects of its proposal. In particular:

a/ Use Interim Recerts as Well As Annuals, if More Recent -- BHA should not only use the last annual recertification to determine who are approved household members, but should consider interim recertifications if they are more recent. Doing otherwise may exclude consideration of legitimate circumstances.

Response: Thank you for your comment. Public Housing is aligning its policy with Leased Housing in this regard, and both policies require the approved household member to be part of the composition at the last annual.

Comment: b/ Consider Using EOHLC's Model About How Carryover Live-In Aides Are Handled - EOHLC has moved in a progressive direction to recognize that live-in aides who've been listed as part of the household should at least be considered for occupancy, whether their income was previously included in household income or not. BHA should evaluate whether a similar approach should be used on the federal side (and promote greater uniformity of treatment between the two programs, to the extent possible).

Response: Thank you for your comment. BHA follows the Federal definition of a live-in aide which reads (in part) that the live in aide would not otherwise be living in the unit except to provide disability-related care.

Comment: c/ Act Promptly on Requested Additions, and Do Not Penalize If Matter Is Delayed (Or If Minor Child & Caretaker Arrangements Need to Be Considered) - In 2018-2019, BHA agreed that if a household was in the process of adding someone, but that process had not been finalized at the time of the death of the tenant of record, the proposed addition would not be penalized and could be considered for residual tenancy. BHA recognized that often there had been significant delays in its completion of such reviews. The current proposal would eliminate this and leave the proposed addition out of luck. BHA has indicated that with its new consolidation of Admissions processes into a Leased Housing model there should not be significant delays in approvals. However, BHA has not included any metrics on its own performance in this regard, and it should. Here and below (under proposed additions), BHA should commit to the same standard

of “promptness” to which it holds residents—i.e., that there will be an answer within 30 days or less. If this standard has not been met, and there is a holdover adult guest known to BHA from the application process (or if there is a minor child who is a member of the household automatically but might require additional screening, and guardianship/caretaker arrangements may be made for the minor to remain), BHA should consider the remainder eligible for Residual Tenancy consideration.

Response: Thank you for your comment. BHA will consider its ability to apply metrics for a decision.

Comment: d/ Agree With Revised Policy Regarding Income Eligibility of Residual Applicants -In the revised draft, BHA has proposed that Residual Tenants should not be considered “new applicants” in the sense of admissions eligibility thresholds (80% of AMI or below), but instead would be evaluated using the usual “over-income” criteria for existing tenants (i.e., eligible as long as the family’s income hasn’t exceeded 140% of AMI or similar standard for two annual recertifications). This makes good sense.

Response: Thank you for the positive feedback on this change.

Comment: 3. Proposed Additions to the Resident Household  
a/ Proposed Additions Should Be Processed Promptly, and Guest Period Extended If There Is Delay for Reasons Outside of Tenant’s Control. Under the BHA lease, tenants have the right to have a guest for up to 45 days, and management may extend this for good cause. The prior version of the ACOP provided that if a tenant sought to add an adult to the household within the guest period, but the processing took longer, the proposed addition could remain in the unit in the meantime, with the proposed addition’s income being counted in setting the rent in the meantime. This could include any appeal period (where the tenant was disputing a denial of the proposed addition). BHA’s revised draft would eliminate this. The proposed addition could not stay in the unit beyond any guest period, and their income would only be used in setting the rent if the addition was approved. As noted above, one of the rationales for the revision is that BHA’s new Admissions protocols follow Leased Housing models and should be speedy. Here again, this commitment should be expressed in a performance commitment – that BHA will process the request in 30 days the guest occupancy period should be extended. This is particularly important since many intimate relationships (marital or domestic partners, as well as kinship care) may be implicated and BHA must be sensitive in how it handles these matters, while at the same time ensuring that there is proper screening.

Response: Thank you for your comment. BHA is seeking to eliminate unapproved occupants residing in the unit with this change, and will review if it can apply metrics in the decision-making process.

Comment: b/ Handling Proposed Additions of Minors. HUD regulations provide that if a minor joins a household due to birth, adoption, or court-awarded custody, the minor is considered part of the household without advance approval by the housing authority.

GBLS has previously explained, and HUD and BHA have agreed, that given the familial status language in 42 USC 3602(k), a similar approach should be taken for other minors with documented caretaker arrangements that are sufficient for school enrollment or medical care. We recognize that tenants should be expected to “promptly” report the presence of such minors to the BHA, and that in some cases screening of the minors is necessary.

Response: Thank you for your comment.

Comment: c/ Denial of a Proposed Addition to the Household Should Not Be for Generalized “Good Cause”, But Should Cross-Reference the Eligibility Provisions of the ACOP. Section 9.1.3(e) should not refer to “good cause” for rejection of a proposed addition to the household but instead should refer to the eligibility and screening criteria in Chapter 5 of the ACOP.

Response: Thank you for your comment. Language revised as suggested.

Comment: d/ Handling Situations Where a Proposed Addition Would Result in Serious Overcrowding. Section 9.1.3(f) provides that a proposed addition can be rejected if it would result in severe overcrowding. However, what occurs if the addition is because of a birth—for example, a mother has triplets? The phrase that BHA will initiate an underhoused transfer seems like the right answer, but it is not clear where BHA will draw the line between rejecting proposed additions and conditioning the approval on the processing of a transfer. In combination with the proposed changes to 9.1.4(b), this could leave families in limbo for as long as it takes BHA to effectuate a transfer. This seems problematic and likely to increase homelessness. In cases of family reunification, such as where children were temporarily in foster care, it may be appropriate to deny the placement in the existing unit, but there must then be expedited handling of the matter to be consistent with state and federal policies on reunification (and the Administrative Transfer T2 category may need to be tweaked to encompass this within administrative transfers). Clarification would be helpful. Additionally, providing a definition of “severe overcrowding” (as distinguished from regular overcrowding which is defined in Chapter 11) may help ensure consistent application of the policy.

Response: Added language to clarify that in the event of birth, adoption or court order, that the overcrowding will be permitted and the family will be placed on a transfer list.

Comment: Recertification a/Elimination of Interim Reporting of Increases (Except in Changes from Zero Income) is a Good Change. Section 9.3.1 (pp. 106-108) removes language on increases in income that need to be reported on an interim basis. BHA has eliminated this language, substituting the language regarding reporting changes after someone has been on zero income and on handling unusual income fluctuations. This change simplifies the process for all concerned. BHA is commended for this.

Response: Thank you for your positive feedback.

Comment: b/Whether Decreases in Family Income Must Be Reported (As Opposed to It Being a Good Idea That Will Help the Family). Section 9.3.1(c) appears to require families to report on decreases in family income. That is not correct. While it is usually to the tenant's advantage to report such decreases immediately, nothing in applicable law or the parties' lease requires tenants to do such interim reporting. If the point here is to say that tenants who do report income reductions must get in the supporting verifications, etc., within 30 days in order to get the rent change processed based on the original date of reporting the income loss, that's understandable and the draft should say that, with some flexibility (as discussed below) where there is delay in verification for reasons outside of the tenant's control.

Response: Thank you for your comment. Language added to state that "if a family is requesting an adjustment in rent due to a decrease". Note: This language also exists in the Admin Plan.

Comment: c/ Giving Some Leeway For Rent Decrease Effective Date Where Delay Is For Reasons Outside Tenant's Control. Section 9.3.1(d) (p. 108) adds language that if a household fails to get in verifications needed to support a rent change, BHA will not take action and will deny retroactive relief. However, the new section is entitled "verification of interim changes" and could be interpreted to apply to both interim increases and decreases (and to bar BHA from taking any action on an increase in income if the resident hasn't cooperated). The subsection should be retitled to avoid that problem. In addition, there are several practical concerns about the new language. First, the family may not be able to get the documents for reasons beyond its control (for example, if there is a job loss and a former employer is not responsive, or a household member has vacated and not supplied a new address). Second, it is not uncommon for families to report delays from BHA in letting them know what documents are needed, or to go to the office and be unable to schedule an appointment to see the right person. Many families have reported that BHA staff have misplaced documents, and there are not standard protocols for providing signed and dated copies or log entries into tenant files or other records tracking the transaction. The 30-day deadline should run from when the BHA provides written notice of what documentation is required. If delay is caused by third parties or improper BHA staff handling/communication, tenants should not be penalized. There should also be leeway where issues of disability, limited English proficiency, or domestic violence factors affect the tenant's ability to respond within the time-frame.

Response: Thank you for your response. Changed title to "Effective date of Interim Changes".

Comment: Miscellaneous a/ Update DHCD to EOHLC. At several locations –In Chapter 1, 1.5.3 (p. 9), Chapter 4, 4.5.8 (p. 37), and in Chapter 11 in the definition of Transitional Housing (p. 142) there are outdated references to DHCD which should be replaced with EOHLC.

Response: Thank you for your comment. Made edits where necessary.



Comment: b/ Elimination of Options for Those Who May Qualify for More than One Unit Size. In Section 6.1.3 (p. 72), original subsections (g) and (i) (under the revised unit size standards) have been eliminated, and revised subsection (g) (what was subsection (h)) has been edited to eliminate some language, with later sections being re-designated. Language that referred to households who might qualify for two different unit sizes having the right to choose between those sizes is eliminated. Language is eliminated about those electing an assignment to a studio apartment having a later right to a substantial cause transfer to a 1-BR unit. Language is also eliminated saying that single person households will only be assigned a 1-BR unit. It is not clear how situations will be handled for single persons who qualify for either studio or 1-BR units. In the past, because there was insufficient demand for studio units, BHA established an incentive for people to accept such units which might be available sooner, but at the same time ensured that tenants would not be stuck in studio units indefinitely by giving them a preference to eventually move to a 1-BR unit.

Response: Thank you for your comment. At this time, we have removed this language to allow us the opportunity and time to address the large number of emergency transfers. We are willing to review this again in the future once the emergency transfers have been significantly reduced.

Comment: c/ Not All Cases May Require Documentation to Verify a Reasonable Accommodation Need. At Section 6.2.4(a) (p. 79), the requirement for reasonable accommodation requests to be supported by documentation should be eliminated if the disability and disability-related need are readily apparent or otherwise known to BHA. For example, it should be readily apparent that a person who uses a wheelchair needs a wheelchair-accessible unit, and the person shouldn't be required to get medical documentation.

Response: Thank you for your comment. If the disability or disability-related needs are readily apparent or otherwise known to BHA, supported documentation is not necessary.

Comment: d/The Exemption of Elders from Transfer If They Are Only Over-Housed by 1-BR Is Too Narrow and Should Be Expanded. Section 7.1.2(f) of the ACOP exempts from required over-housed transfers elders who are only over-housed by 1BR at sites that do not have the right bedroom size. BHA has long had a policy that residents are not required to leave their developments if they are in the smallest available unit size at their site, and this has not depended on the resident's age. This may also make sense for non-elderly disabled residents. For example, three of the BHA's state family developments – Faneuil, Fairmount, and Gallivan Boulevard – do not have 1-BR units, and residents should not be required to leave their communities if they are in the smallest size available. In addition, consistent with past practice, BHA should distinguish between cases where wrong-sized residents can elect to remain on site (although they may move more slowly) and when city-wide assignment will occur, and provide clear explanations on this both for individual residents and for resident leaders,

given BHA's long-standing practice of trying to maximize households remaining on site if that is their desire.

Response: Thank you for your comments.

Comment: e/ Renumbering Certain Parts After Section 7.6 (and Table of Contents). Existing Section 7.6 (p. 90) (which referred to transfers on an AMP waiting list) is eliminated, and Section 7.7 is redesignated as 7.6. However, the subsequent sections and Table of Contents also need to be revised.

Response: Thank you for your comment. Made edits where necessary.

Comment: f/ Clarifying that EOHLC Standards, As Applicable, May Apply to Additions to the Household. In Section 9.1.3(d), there is only reference to BHA and HUD standards here, and unlike other parts of this Chapter, there is no separate subheading for state programs—so BHA may wish to add “EOHLC, as applicable”.

Response: Thank you for your comment. Revised, as suggested.

## **Budget**

Comment: S. Financial Resources (p. 26) In addition to what's here, it would be helpful for the RAB to get a briefing on overall BHA finances, similar to what Debbie Sullivan has provided for the BHA Monitoring Committee, at a time of year when the RAB has sufficient space on its agenda.

Response: The BHA appreciates the feedback regarding the Financial Resources. The BHA agrees that opportunities for discussion with the Resident Advisory Board regarding overall BHA finances are valuable and will engage the RAB as schedules and agendas permit.

## **Capital**

Comment: S. Other Capital Grant Programs (p. 93) -- No change to information last revised 10/15/2023; should there be updates to this section?

Response: In an abundance of caution, the BHA has listed special grants applicable to federal public housing sites that may not have yet been listed in an Annual Statement or may be applied outside of Capital Fund projects. The information presented is indeed

unchanged since October 2023. In order to avoid any confusion, BHA will delete the date from the chart so that it will be clear that the information is accurate as of the date of the 2026 Annual Plan Supplement (as indicated at the bottom of the page in the footer to the Annual Plan Supplement document.

### **Five-Year Plan Progress Report**

Comment: 1(Admin/Customer Service) 1/ Customer Service (p. 3) This refers to BHA resident surveys. When will these be conducted, and is there a projected timeline to start, complete & compile results? What customer satisfaction tools will be used at redevelopment sites, and what are the expectations for reporting by Mixed Finance partners to the BHA and resident leaders so there is a complete picture? More detail on this aspect would be helpful. What efforts are included to ensure that surveys reach a representative sample of people served by BHA who have communications challenges (those of limited literacy, with mental health or cognitive disabilities, limited tech abilities, limited English proficiency, or the like), and to assist those residents in relaying their experiences to the BHA?

Response: Thank you for this comment. Following engagement with the RAB and BHA staff, the BHA launched the resident wide survey in Fall 2025 as part of the annual rent determination process. All BHA public housing residents and voucher holders will receive a link to the survey on their rent determination paperwork, which is mailed on a rolling basis throughout the year. The survey is available in Spanish, Chinese, and English. The BHA will review and analyze results on an annual basis. Results will be shared with BHA leadership and the Resident Advisory Board on an annual basis. The BHA will also make annual presentations of survey takeaways available to LTOs upon request. The BHA will engage in an ongoing review of the survey process to ensure that responses are representative of the BHA community. The BHA will evaluate process changes and enhanced outreach efforts based on analysis of survey response, including non-responsiveness.

Comment: 2(Comms) This refers to an audit which identified website issues and ADA compliance. Can BHA share the audit findings, its responses, and what changes were made to the website? In addition to website accessibility improvements, what measures will be taken to ensure accessibility of all communications (plain English, readability of important documents, evaluation of efficacy of Babel notices, bimodal communications to meet the needs of those with limited literacy, etc.)?

Response: The audit found that some areas of the website had fallen out of compliance. The BHA has been working with its website vendor regarding ADA compliance and all the areas that were out of compliance on the web pages (ie; in the html pages) have

been resolved. We also have an ongoing contract with our website vendor to conduct monthly audits and maintain the ADA compliance of these pages going forward. We are still working with them on compliance around pdf documents that are attached to the website, which is a little more involved. However, we are nearing a solution to bring these into compliance as well and anticipate that this will be completed in the coming months.

Comment: 3(Customer Service) This refers to finalizing the customer service training curriculum for BHA staff and rolling it out by late 2025. Could the curriculum be shared, as well as a projected timeline for the start & completion of the training cycle, and how it will be operationalized in the future (for new staff, as well as to refresh existing staff as there may be new technologies, changed policies, or subsidy transitions)? The training should include trauma-informed and disability-informed practices for all categories of disability.

Response: Thank you for this comment. Due to staffing changes, the development of customer service training curriculum has been delayed. The BHA has adapted to this shift by focusing on customer service and process improvements within the Emergency Response System (ERS) team. In addition to standardizing expectations around phone etiquette, the BHA has also enhanced the use of One Call Now as a tool to facilitate communication and transparency with residents. In 2026, BHA will incorporate customer service focused sessions into the orientation program for all new BHA employees. Additionally, BHA will continue the roll out of programmatic focused trainings for public and leased housing staff that include a focus on rent calculation, pest management, and other topics. The BHA will also continue to evaluate additional training opportunities for resident facing staff.

Comment: 4(Admin/Admissions) BHA's plans to enhance the applicant experience were delayed due to construction delays in its downtown office, and so the date has been shifted to 2026. BHA should periodically update the RAB on progress in this area (rather than wait until the next Progress Report).

Response: Thank you for your comment. Our goal remains to enhance the applicant experience; however, due to construction delays we have been unable to implement at this time. We are committed to progress and are more than happy to attend a RAB meeting to provide BHA's progress.

Comment: 5(Ops) BHA reports not only was it able to resolve a huge backlog of work-orders (so that 95% of them were completed in 60 days), its performance has so improved that it has set a new goal of getting 95% of work orders completed in 30 days. GBLS is very pleased to see this, since the 30-day turnaround is both a Sanitary Code and a post-receivership performance measure. BHA leadership & staff are to be commended for this turn-around. BHA may also want to share with residents & the public a report that it provided to the Boston City Council on work-order turn-around progress.

Response: Thank you for the comment.

Comment: 6(Ops) 2/ Maintenance, Management, Inspections (pp. 3-4)

Under the 1st bullet, Maintain occupancy rate of 97% or better, the report indicates that BHA is currently at 98% for its federal program. This is excellent, and this is a long-term goal (included in the post-receivership order as well) which BHA should maintain.

Response: Thank you for your comments.

Comment: 7(Ops) Under the 2nd bullet, Maintain recertification rate of 98% or better, the report indicates that BHA was at 96% at the end of the last fiscal year and at 97% in October, and that it is aiming to get to the 98% mark. BHA should report on what barriers it is encountering in achieving its performance goal and its strategies to overcome them. In addition, BHA should take supportive rather than punitive approaches to address recertification rates. Residents should not lose their assistance where they are trying to reach BHA staff without success (either on site or through remote arrangements with Leased Housing), and tech improvements should also foster improved ability to connect. Residents with disabilities, limited literacy, limited English proficiency, limited access to technology, or other barriers that make it more difficult for them to complete recertifications should receive support from BHA staff to enable them to complete their recertifications rather than be at risk of losing assistance.

Response: Thank you for your comments. BHA implemented remote recertifications in Public Housing (PH) in 2025 to mirror the process Leased Housing (LH) implemented in 2020. This provides additional options for families to complete their recertifications to support compliance with recertification requirements.

Comment: 8(Lsd Hsg) Under the 3rd bullet, Maintain Section 8 Management Assessment Program (SEMAP) High Performer status, the report indicated that BHA scored 97% at the last SEMAP assessment in March, 2025, and this is sufficient for High Performer status. GBLS would ask BHA to share the last SEMAP report, and hopefully BHA will keep up its strong record in this area.

Response: Thank you for the comment. The SEMAP individual Indicator Score Report was sent to the commenter.

Comment: 9(Ops) Under the 4th bullet, Ensure 100% of public housing units are inspected annually, the report indicates that BHA does inspect 96% of the units, and the other 4% have access issues which require BHA to pursue lease enforcement action (private conferences) to gain access. BHA should keep the goal, but including information on barriers to full compliance is helpful.

Response: Thank you for the comment. BHA remains committed to the goal of inspecting 100% of public housing units annually; the current 96% completion rate reflects strong compliance, with the remaining units impacted by access issues beyond BHA's immediate control. These barriers include changed or unauthorized locks, refusal

of entry, the presence of unsupervised animals, or situations in which only minors under the age of 18 are home at the time of inspection. In such cases, BHA follows established lease enforcement protocols, including private conferences, to obtain access and complete inspections as promptly as possible.

Comment: 10(Admin) Under the 5th bullet, implement resident service plans for eight (8) BHA elderly/disabled developments, the report indicates that BHA has recently hired a Resident Services Coordinator, and that work will be underway on evaluating resources and service needs for 3 elderly/disabled sites – St. Botolph, Patricia White, and Hassan. (St. Botolph and Patricia White have been or are soon to be converted to Section 8 Mixed Finance.) BHA should share the information about the new Resident Services Coordinator (and perhaps invite to an upcoming RAB meeting to address questions resident leaders have). Timelines should be established for the completion of the plans at the three sites listed, and to identify other sites that will have plans developed with involvement of resident leaders.

Response: Thank you for this comment. The BHA is committed to strengthening resident services and programming across BHA communities and has hired a new Director of Resident Services to support this effort. By initially focusing on 3 elderly/disabled sites, the BHA hopes to develop updated programming models and standards that can be adapted to other BHA owned elderly/disabled communities. The Director is currently working closely with residents, site-based partners, and other stakeholders to evaluate existing programming and create plans that can be implemented at BHA PBV owned sites, such as St. Botolph and Patricia White, as well as public housing communities. We are more than happy to update the RAB on this goal area as we continue to invest in this work.

Comment: 11(Admin/Civil Rights) The last bullet refers to monitoring & enforcing fair housing obligations across BHA's portfolio, including private management firms operating at BHA properties. The report indicates that BHA has compiled its agreements with management companies and is reviewing them, but is silent on its assessment of its own staff. No timeline is set for completion of the review, issuance of recommended actions, and time to come into compliance. Moreover, the goal is silent about assessment of Mixed Finance partners' policies and performance on fair housing obligations. BHA should revise the goal to include its Mixed Finance partners, should report on its internal assessment, and should set timelines & performance goals for completion of review, recommendations and compliance actions for BHA staff, private management partners, and Mixed Finance partners. (The Mixed Finance Committee, discussed under item 8 below, would be one mechanism for regular reporting and monitoring on Mixed Finance fair housing performance.) BHA could consult with advocates and with resident leaders representing the RAB and LTOs at mixed-finance sites to solicit feedback on performance, share the results of BHA's review, and implement tracking/reporting mechanisms to ensure goals are met.

Response: Thank you for your comment. BHA's current activity in this area represents a desire to refine and enhance BHA's oversight of private management companies within

its portfolio- including mixed finance sites. This is not to suggest that any management companies are out of “compliance,” nor that BHA is uninvolved in any fair housing matters at these sites. BHA acknowledges the Resident Advisory Board, Local Tenant Organizations, and our mixed finance partners as important resources and will engage with them when appropriate. Timelines for this project will be dictated by BHA’s internal evaluation of its policy goals and objectives.

Comment: 12(Admin) 3/ Create Economic Opportunity (pp. 4-5)

The 1st bullet provides for the increased employment & training of Section 3 workforce, including through use of Project Labor Agreement (PLA) mechanism. The report is non-specific in terms of outcomes. Without a clear measure of performance, it is impossible to measure progress. BHA should revisit this item so that there is a concrete, measurable goal and reporting on performance.

Response: BHA appreciates the needs for more concrete goals in this area. The BHA is improving data collection about current Section 3 participation to comply with updated reporting requirements and to support establishment and attainment of meaningful targets. While current data collection practices allow for annual reporting, they are too infrequent to respond to data during the course of a contract and may undercount current Section 3 participation. The BHA recognizes significant advantages of more frequently, digitized data collection, enhanced clarity for construction contractors and workforce about reporting requirements, and of affirmative steps to promote increased participation. The BHA looks forward to collaboration with workforce stakeholders and community members on this topic.

Comment: 13(Admin) The 3rd bullet sets a goal of support for 120 new BHA first time homebuyers. It is not clear, from the report, exactly where things are. It states that 29 households were supported in these efforts, and of this group, 65% were able to purchase market-rate homes. It also says that 26 households were able to remain in Boston—it is not clear if this is a subset of the original group of 29 or is a 2nd group of households assisted. Please clarify. Assuming that the goal of “support” here is not the same as “becoming a homeowner”, it would appear that BHA is on track with this goal.

Response: In 2025 BHA supported 38 tenants becoming homeowners with 35 out of those 38 purchasing in Boston. We define support here as successfully purchasing a home.

Comment: 14(Lsd Hsg) The 4th bullet provides for supporting 100 BHA households who wish to move to Expanded Choice Communities. The report indicates that 69 households applied for this help, and of these, 26 were assisted in such relocation. At this rate, BHA is ahead of the pace to accomplish the full goal. BHA should describe the nature of the assistance given.

Response: In 2025, ECHO received 270 new applications and successfully enrolled 140 eligible families into the program. Throughout the year, ECHO made significant strides in supporting families, relocating 80 households, including 46 to Expanded Choice

Communities. A total of \$272,437.24 was allocated to cover broker fees, security deposits, moving costs, and other essential relocation expenses. This investment underscores ECHO's ongoing commitment to helping families secure stable housing. Beyond financial support, ECHO continues to provide invaluable services, including landlord outreach, rent negotiations, RAFTA submissions, and connections to furniture banks and heating assistance. These efforts further highlight the program's dedication to improving housing stability for those in need.

Comment: 15(Ops) The 5th bullet sets a goal of enrolling 2,000 BHA households in the Family Self-Sufficiency (FSS) or other wealth-building programs. The report indicates that 1,579 households have been enrolled to date. This is a huge success, and BHA should consider whether it wishes to revise the goal upward. The report also shows very positive outcomes on credit scores, savings, and increased income. As has been stated in prior years, most participants are in the Section 8 program, and the public housing FSS program is relatively small. Whatever BHA can do to grow the public housing FSS program should have long-term benefits for families and the community as a whole.

Response: Thank you for your comments. BHA is seeking to expand FSS participation in the PH portfolio where possible.

Comment: 16(Admin/Lang Acc) The 6th bullet discusses increasing resident participation in workforce development or other self-sufficiency events by 50%. The report lists what has occurred during the year, but does not supply enough information to know whether BHA is achieving this goal. (To evaluate this, one would need to know what the prior level of participation was.) Alternatively, BHA may wish to change the performance measure. Please clarify.

Response: Thank you for this comment. The BHA used this past year to evaluate coordination and tracking around workforce development programming and will be modifying how it tracks performance in this area. With regards to increasing resident participation in workforce development or other self-sufficiency events by 50%: BHA hosted an in-person job fair in September 2025 to connect residents with employment and job training opportunities, whereas previously these fairs had been only online. One Hundred Ninety-Five (195) residents registered for the event at which 15 community partners did outreach for their job training and placement programs. All residents registered will receive upcoming opportunities via email. While we do not have the number of individuals who attended the virtual events last year, we will track this information going forwards. We were able to track an increase in residents participating in digital equity workshops from 39 to 49.

BHA is also engaging with Northeastern University to increase utilization of scholarship programs for BHA residents. There were 7 Northeastern scholarship winners for 2025: 3 for undergrad; 4 for College of Professional Studies. In the Fall of 2025, BHA hosted a scholarship information session with Northeastern with 20 attendees to boost



awareness of the program. Since then, there have been at least 16 applicants to Northeastern for the available 10 scholarship slots in 2026.

Comment: 17(Digital Eq) The 7th bullet refers to hosting 100 digital literacy classes where 95% of participants complete the classes and achieve at least one of their goals. The report lists different measures, and from that, it appears that BHA is behind on the goal (only 11 classes so far, and completion rates significantly below 95%). However, it may be that BHA wishes to revise positive performance measures—please clarify.

Response: BHA is committed to hosting 100 digital literacy programs by 2030. This includes computer classes, digital skills workshops, and tech drop ins. By the end of 2025, BHA's Digital Equity team met the goal of hosting 21 digital literacy activities with 151 participants. We are working to improve our pre and post class survey questions, which measures goals attainment and confidence levels, as well as the way the surveys are distributed, to gather better input from participants.

Comment: 18(Admin) 4/ Partnering with Residents to Promote Community Safety (pp. 5-6) The first bullet refers to launching and growing after-school programs at 4 locations, including Franklin Field, Hailey, and Commonwealth. The report indicates the program is underway at Franklin Field and in process at two other sites (it does not indicate if those are Commonwealth and Hailey or some other location(s)). As elsewhere, the report should list the 4th site being considered (or any changes in the original list) and set projected timelines to achieve the goal at the 4 locations. It would also be helpful to state the number and ages of children being served by the program at Franklin Field.

Response: BHA has launched new afterschool programs at three sites: Franklin Field, Commonwealth, and Mildred C. Hailey. At Franklin Field, the on-site youth center has served over 100 youth either through afterschool or summer programming. Ages of these youth range anywhere from 5 to 19 years old. In addition to homework help and recreation programming available daily, the flagship program offered at Franklin Field is a paid, workforce development program for teens with 35 participants currently. Teens in the program learn about workforce skills, develop resumes, and participate in career exploration all while being paid for their time. At Mildred C. Hailey, BHA has partnered with Boys and Girls Clubs of Boston to operate the center and at Commonwealth we have hired a Youth Engagement Coordinator who is running weekly teen nights and will launch personal development workshops for teens in 2026.

We have not yet determined the fourth site for youth programming. This will depend on a variety of factors, particularly resident input and funding availability. We continue to look at the program priorities across different public housing family sites and youth needs to see where it makes sense to expand programming. Our hope is to have an expansion plan by the end of 2026 and pitch funding partners on the proposal in 2027 to meet our goal of youth programming at four sites by 2030.

Comment: 19(Public Safety/Admin) The 2nd bullet refers to developing and implementing community safety plans at ten (10) sites. The report, however, only refers

to identifying BHA police representatives by neighborhood who can assist with such plans, but it does not list any progress in developing any plans or implementing them at specific sites, or who has the responsibility for developing these plans. As referenced in the global comments above, safety at sites is a major resident concern, and there is the question whether BHA and the City are continuing to assess sites for physical and personnel measures needed, as contemplated by the City's Elderly Security Ordinance. This should be fleshed out, including which specific sites, a projected time line, and who will be involved in developing and implementing the plans (including primary point person).

Response: Thank you for this comment. The BHA is actively advancing safety related investments in accordance with security plans across the BHA portfolio, with a targeted focus on elderly/disabled sites with single points of entry. Over the past year the BHA has installed video/intercom door systems at our elderly/disabled communities and hosted sessions with residents to provide training and highlight the significance of these types of systems. In addition to these investments in safety infrastructure, the BHA Police has worked to institute neighborhood-based representatives that serve as a key point of contact for residents and resident leaders with safety concerns. This team has participated in LTO meetings at BHA communities across the city and will continue this resident engagement and relationship building in the coming year. In 2026, BHA will build on this ongoing work to promote community safety by ensuring that all elderly/disabled communities have regular meetings with BHA Police, management staff, and residents to discuss safety issues, site updates, and other key topics of importance to residents. The BHA will also continue to analyze safety related issues across the BHA portfolio and work collaboratively with BPD, Recovery Services, and other key stakeholders to address safety concerns.

Comment: 20(Capital) The 3rd bullet provides for investing in technologies that enhance resident safety. The report indicates that BHA has successfully installed new intercom systems at developments with a single source of entry. BHA should list what those communities are. If BHA is going to do other work under this item during the 5-year plan, it should list what is planned, for which sites, and provide a projected timeline.

Response: See document provided by BHA to RAB and posted on website: Capital Planning Overview of Completed and Planned Projects.

Comment: 21(Capital) 5/ Green & Healthy Communities (p. 6)

The first bullet here refers to developing comprehensive capital plans for all sites. The report is not specific about timelines for performance, and it should be. Otherwise, this may become an empty promise. It would also be helpful to list the public housing communities at which capital planning is already underway.

Response: BHA appreciates the comment as we too are wary of empty promises. To one degree or another, capital planning is continuously underway for all BHA communities. The commitment here is to draft, share and refine site-specific capital plans. We aim to roll out a predicable schedule for engagement with key constituents

(resident leaders, staff, the community at large) that will include drafting, review and finalizing (i.e., publishing) plans on a site-by-site basis. During the upcoming year of 2026, we will develop and disseminate a timeline to cover all 50+ housing communities (and the subset of apartments that are in fact scattered-site portfolios). The aim is to publish plans for all BHA communities before the end of the 5-year horizon.

Comment: 22(Capital/Admin) The second bullet refers to weatherization, insulation, and the installation of heat pumps for 1,500 units. The report shows that BHA has already completed work on 1,200 units. This is an exemplary achievement! Should BHA revise the goal for the balance of the 5-Year Plan?

Response: The BHA is seeking to accelerate energy-smart upgrades to reduce energy costs and improve unit quality. While many units have been insulated and/or weatherized, many units have not received all three measures and the BHA is retaining the existing goal as it seeks to accelerate heat pump deployment.

Comment: 23(RED/Admin) The 3rd bullet called for modernization of 2,700 apartments. Here, too, BHA is ahead of schedule in achieving this goal, having modernized 1,987 units. Can BHA provide a breakout of where this work was done, and where the balance of the modernization will be done? Is this another circumstance where BHA should “raise the bar” on its 5-year goal to be more ambitious?

Response: That figure of 1,987 comprises the following sites where work is either complete, in progress or—in the case of Faneuil phase one—funded:

Old Colony 4	104
Old Colony 5	104
Bunker Hill bldg M	102
Whittier 3	54
Hailey 1A and 1B	91
Old Colony 6	89
Eva White	102
MEM building A	94
Mission Main	445
Hailey modernization	455
St. Botolph	131
Doris Bunte	163
Faneuil 1	53
	1987

Modernization efforts will continue at several sites, as described elsewhere in the Annual Plan.

Comment: 24(Admissions/Comms) The 4th bullet establishes a goal of increased accessibility of available housing options. Presumably this covers both public housing

and Section 8 units. In the past, there was an issue where some of the descriptions on the BHA website of available communities did not indicate whether there were barriers to access. A disabled applicant might not be aware of problems until faced with unit acceptance and visiting the offered site. Have those problems been addressed? For tenant-based voucher units, is there any listing maintained of accessible units? It's promising that BHA has retained an accessibility expert and is looking into enhancements at Lower Mills and Heritage which could improve accessibility. There are major challenges at Barkley Apartments related to non-functioning elevators which have been the subject of several Boston City Council hearings and BHA reports. In the past, Eva White had significant accessibility issues, and it's not clear if the RAD blend conversion will eliminate those problems. Even though HUD does not require this, it may be helpful for BHA and the City of Boston to conduct an updated 504 assessment to determine what accessibility barriers exist throughout its portfolio and set goals and timelines for addressing those barriers.

Response: As noted above BHA has been working with its website vendor regarding ADA compliance and will share this issue with the vendor. BHA staff welcome the opportunity to continue the conversation with the commenter.

Comment: 25(Admin/RED) The 5th bullet refers to completion of 10 open space projects during the 5-year plan period. The report talks about progress with urban agriculture and gardening at several places but does not give specifics. Please identify specific sites, what work has been completed or is planned there, and projected timelines over the course of the plan.

Response: The BHA is seeking to complete open space work, such as recreation, farming, garden and related projects at Franklin Field, MLK Towers, Doris Bunte, Charlestown, and other properties. The BHA recently completed open space work at Mildred Hailey and garden installations at Commonwealth and MLK Towers. Redevelopment projects, such as St. Botolph and Doris Bunte, also include outdoor improvements.

Comment: 26(Admin/Capital) The 6th bullet refers to solar development projects at ten (10) sites. The report indicates that BHA has completed solar work at two buildings. The report is not clear if these buildings are at the same or different sites (or which sites are involved). BHA should provide a list of proposed sites/work and a projected timeline so progress can be measured.

Response: The BHA is seeking to advance solar development at the following sites: Alice Taylor, Codman, JJ Meade, Mildred C. Hailey, Pond Street and Spring Street. Other than Codman, each of these developments have multiple buildings. Several buildings at Hailey have solar constructed at time of response. The BHA is additionally planning for solar at Lower Mills and Heritage PBV properties.

Comment: 27(Admin/Capital) The last bullet refers to partnering with green workforce training programs for 20 site-based sustainability projects. The report indicates

completion of sustainability projects at 3 sites, and completion of a training project at a 4th site. BHA should supply the details (which developments and what was done). In addition, there should be an overall proposal for what site work will be done during the 5-year period and a timeline for completion, so that progress can be measured.

Response: Please find the following sites we've listed in this exercise (i.e. GI/climate resilience/food production projects, some of which included **green workforce development, identified in bold**) with a quick blurb next to each. Please let me know if any questions/comments:

1. Commonwealth – Overgrown area of debris and tripping hazards transformed into new garden space, with 56 raised beds, and including GI features of permeable pathways and a bio-swale receiving site runoff.
2. **Doris Bunte** – New garden space – 8 raised beds **installed by YouthBuild**.
3. **Franklin Field** – BHA partnered with Parterre and the Office of Green Infrastructure (OGI) to conduct a **hands-on education and maintenance event at the FF rain garden site** with youth from the Franklin Field Teen Center. FF was also the site of a low-cost intervention GI project – in partnership with the FF task force, BHA contracted with Brothers Construction to implement a rain barrel pilot project, where water is captured from the roof of the elderly community center. Franklin Field, as we know, also completed garden phase 1. ☺
4. **MLK** – BHA's MLK garden site (small footprint of 4 flourishing garden beds installed fall 2024) provided an **opportunity for a young urban farmer from Haley House Thornton St. Farm (via GrowBoston grant funding) to get more teaching/leadership experience as residents benefited from hands-on learning**, access to growing their own food, and garden recreation.

Comment:28(Admin/RED/Lsd Hsg) 6/ Long Term Financial Sustainability (pp. 6-7)  
The first bullet here refers to converting at least five (5) BHA public housing properties to project-based vouchers (PBVs) during the 5-year plan period. This will help guarantee a higher and hopefully more stable income stream to support both ongoing operations and needed renovations. BHA refers to this having been accomplished for St. Botolph and that it is advancing a similar project at Doris Bunte Apartments. BHA should have a projected timeline and list of possible sites which can then be referenced during the life of the 5-year plan. From the Demo-Dispo update (see Supplement), the timeline at Doris Bunte has been delayed, and there is a similar timeline at Ausonia. One site may advance before the other. In addition, if any sites are converted through a RAD/Section 8 blend (such as with the recent CHAP commitment at General Warren), will these count?

Response: BHA agrees that it is important to have a definitive list to track over the five years. Currently that list would include: St. Botolph, Hailey (modernization carried out by BHA), Doris Bunte, Ausonia and General Warren.

Comment: 29(Ops) The second bullet here originally had a goal of getting 25% of accounts receivable under court-ordered repayment agreements. BHA has proposed to

revise this so that the goal would be to have \$4 million in accounts receivable under court-ordered repayment agreements. A few questions here -- (a) Why did BHA change the goal, and how do the two figures compare? (b) How is BHA doing so far on achieving the revised goal?, and (c) Since the revised goal only runs through 12/31/25, what is the goal for the total 5-year plan period?

Response: Due to accounting practices, the total AR would not show a decrease until a balance was paid, having a repayment agreement didn't reduce the Accounts Receivable (AR) total. Therefore, BHA shifted to having \$4M in repayment agreements, which is more realistic outcome for families with arrearages. BHA is ending 2025 with \$1.9M in court-ordered repayment agreements. It hopes to have \$6M in court ordered repayment agreements by 12/31/26. For the 5-year plan, BHA would hope to see 80% of its AR in court repayment agreements as a consistent model.

Comment: 30(Admin/RED) 7/ Build New Public Housing (p. 7) The first bullet refers to BHA proceeding to financial closing on 4 Restore/Rebuild initiatives over the 5-Year Period (both on public and private land). The report doesn't provide any concrete details on specific transactions and plans. To the extent BHA can do so, some detail should be provided, as well as a projected timeline so it's clear whether things are on course or not. In addition, the 4th bullet below provides a lot more detail on possible Restore/Rebuild collaborations with the City, and it may make sense to collapse the 1st and 4th bullets into one point.

Response: BHA is indeed pursuing Restore-Rebuild development at various sites. As of today, BHA expects that the Restore-Rebuild units at BHA's Faneuil Gardens phase one development will be the first to close with a projected date for closing and construction start in 2027. BHA will include more detailed updates on other sites in future progress reports.

Comment: 31(Admin/RED) The second bullet refers to redeveloping 3 BHA sites to enhance opportunities for persons with developmental disabilities, older adults, and families with children. Here again, there is no detail in the report about specific proposals/sites being considered. To the extent BHA can do so, it should add detail, even if things are in early planning stages, and a projected timeline for completing this goal over the 5-year term. BHA should take steps to ensure that it selects development partners with positive track records of providing housing for people with developmental disabilities, including robust training for all staff to ensure that they are meeting residents' needs appropriately.

Response: BHA has undertaken studies of discrete sites but we have not yet advanced any one past preliminary planning. BHA will provide details in future progress reports.

Comment: 32(Admin/Lsd Hsg) The third bullet states that BHA will redevelop at least one site for veterans, and indicates an intent to use Section 8 Project-Based Vouchers (PBV) at a site for this purpose. Here again, there is no detail about what BHA is doing to achieve this goal, and more detail & a projected timeline should be provided.

Particularly given high rates of service-connected disabilities among veterans, BHA should take steps to ensure selection of development partners with positive track records of providing housing for people with disabilities, including robust training for all staff.

Response: BHA is undertaking a study of sites to evaluate their potential for supporting veterans housing. BHA will provide details in future progress reports.

Comment: 33(Admin/RED) The final bullet again refers to the Restore/Rebuild program but refers to Mayor Wu's 2024 goal of making sure that BHA captures all Restore/Rebuild potential units, rather than just referring to 4 possible sites where such units might be used. There is some good detail here (it would be helpful to lay out more on the Chinatown and Charlestown proposals). As noted above, it may make sense to collapse the 1st and 4th bullets into one heading, but there should be a chart providing how many Restore/Rebuild units were involved in the Mayor's goal, what the year-by-year timeline will be for delivery on this goal, and then how the BHA/City are doing in achieving that goal (and what barriers may exist).

Response: BHA acknowledges the sound advice. We have not yet pinned down specific timelines with sufficient clarity to present a chart as suggested. We will aim to do so in future progress reports.

Comment: 34(Res Cap) 8/ Promote Well-Being & Leadership (pp. 7-8)  
The goal here refers to completing 28 LTO elections. It is not clear if this would be over the course of the 5 years. If so, that may not be sufficient, since normally the LTO elections are for 3-year terms and LTOs should have a 2nd election during the 5-year period. It may help to clarify the goal. BHA indicates that it did complete 6 elections (and these included some large sites that hadn't had elections in a while, Charlestown and Hailey) and that it's in planning efforts at 10 sites. It would be helpful to have a shared calendar for BHA and stakeholders who are also interested in supporting this to map out what is planned for the year and identify any barriers to timely completion of LTO elections. For Mixed Finance sites, even if BHA is not directly responsible for elections at some sites, it would be good to have a point person to monitor progress with Mixed Finance LTO elections.

Response: The goal of 28 LTO elections was over the course of the five years. This number could change over time as we progress through the elections at the sites. The BHA completed ten elections in 2025 with the support of partners both at sites with active LTOs and at sites where LTOs were inactive for some time. We will continue to conduct elections at sites that are past due for elections while ensuring that active sites do not go past due for elections moving forward. The BHA will have internal conversations to identify the best way to share information with stakeholders moving forward for possible election support. The Mixed Finance elections are the responsibility of the owners, however the BHA has provided support and guidance in the process and has remained available to the owners and LTO members at these sites. Currently Mixed

Finance partners and LTO members have been reaching out to the Director of Resident Leadership & Chief of Media & Engagement for support.

Comment: 35(Admin) On the Youth Council, BHA refers to meetings that the Youth Council had with the RAB, the Mayor's Youth Council, and various workshops, as well as its feedback on school attendance and youth programming. It is not clear when the comprehensive strategy for the Youth Council is projected to be completed. BHA should provide a timeline & share this with other stakeholders for feedback as it gets to that stage. In addition, it would be good to link this up with the BHA's job readiness programs, Youth Build, Design Corps, etc., so that both the arts-related emphasis of SPOKE and early adult education and construction trades efforts all become part of the mix.

Response: The BHA is currently in discussion with its program partner, Spoke, related to a comprehensive strategy for the Youth Council. We anticipate this will be completed by Spring and will share the strategy/plan when completed. BHA or other job readiness programs that BHA is aware of are shared with the youth council, with youth throughout the portfolio, and with youth attending programming at BHA located youth centers. For example, one member of the Youth Council has applied for the Northeastern University scholarship and we are awaiting confirmation. Another Youth Council member applied for PowerCorps. Youth have received directed outreach about Building Pathways and youth (both on the Council and not on the Council) have attended and will be receiving some prep for upcoming sessions through the Charlestown Adult Ed Center. Youth Build and Design Corps information is also being shared as it becomes available and youth are choosing which programs are the best fit for them. Depending on where youth are located up against the program locations, transportation can be a challenge and youth also want to get paid ideally for attending training programs.

Comment: 36(Admin/HR) This refers to a new leadership training opportunity for BHA staff who've completed the BHA MIB Program (not clear what that acronym stands for). Can BHA provide more detail—what sorts of leadership skills and opportunities will be involved for BHA staff?

Response: The Management at its Best (MIB) program is a program for BHA staff to develop skills that support effective management and communication in the workplace. Through this multi-week course participants focus on topics such as the distinction between management and leadership, conflict resolution, giving and receiving feedback, and disciplinary processes. The new training opportunity for managers is the Managing at Its Best (MIB) version 2, with a focus on Emotional Intelligence components, namely: self-awareness, self-control, empathy, motivation, social awareness and building productive relationships. We launched this new class in May 2025 and we are planning to offer it in 2026 along with Managing at Its Best 1. In 2025 over 30 BHA managers participated in the MIB program.

Comment: 37(Admin/Res Cap) As GBLS has stated in the past, there likely should be additional goals in this area. At one point, BHA had a Mixed Finance Group where



resident leaders, BHA staff, and representatives of developers/managers with Mixed Finance units would confer about common goals and interests, making sure that these sites were being run in a manner consistent with BHA's overall mission and goals. BHA should bring these meetings back and consider what protocols, in addition to those already in place for Grievance Procedures and Resident Participation, will help to ensure resident partnership and protections in a manner consistent with the principles articulated at the beginning of the 5-Year Plan.

Response: Thank you for the comment. BHA staff have worked with mixed finance partners and residents in the past and this was a helpful model to discuss issues and improve communications and consistency. BHA staff look forward to convening a mixed finance meeting in 2026.

### **Language Access including Four Factor Analysis**

Comment: Language Access Plan and 4-Factor Analysis

GBLS recognizes that BHA's efforts in this arena are based not only on federal law but also on state law and on BHA's own policies.

The data presented by BHA demonstrate the strength of BHA's Language Access Division. The scope of services provided is impressive. For context, it would be helpful to see how the numbers on language services provided compare to the numbers of LEP speakers of each language that BHA knows of within its system – for example, does the percentage of requests for interpretation in Vietnamese seem roughly proportionate to the percentage of BHA residents, applicants, and program participants who are known to speak Vietnamese as their primary language? This kind of comparison could help to identify any linguistic groups who are not receiving sufficient language assistance.

Based on the numbers presented, there are almost as many requests for language assistance in Haitian Creole as in Chinese. As GBLS has suggested in each of the last two years, it might be appropriate for BHA to incorporate Haitian Creole as one of the languages into which it translates vital documents.

Response: While the Haitian Creole speaking population has increased in the recent years, it is not yet in the required threshold to provide translations. However, it is a department goal to have Admissions, Operations and Leased Housing forms available in Haitian Creole by the end of 2027.

Regarding the second part of your comment, we will look into this and we will explore ways to promote the Language Access Services with additional outreach to public housing sites and online via signage or other promotional materials.

Comment: It would be helpful for BHA to provide a mechanism for residents/participants to provide feedback on the language services they have received, so that BHA can

consider whether its multilingual line is providing adequate service, whether additional training might be appropriate for either volunteer or staff interpreters, etc.

Response: Thank you for your comment. BHA will look into this.

### **Leased Housing**

Comment: Dear Boston Housing Authority, I am a Section 8 tenant currently residing in Tewksbury, MA. I want to express my concern regarding the difficulties I've experienced with my landlord's management office in connection to the rent increase request and communication barriers that followed.

Over the past few months, I've had ongoing issues where management failed to provide the necessary rent roll information or respond to requests made by both myself and my legal representative. This lack of cooperation has caused delays and confusion with BHA and has created unnecessary stress for my family.

Additionally, I have faced what appears to be retaliatory behavior from the leasing manager after I sought help and clarification about my rent payments and utility charges. Despite my efforts to remain compliant and transparent, I've been met with silence and a lack of communication.

I respectfully ask that BHA strengthen oversight of property management companies working with Section 8 tenants and ensure that families are not penalized for advocating for themselves or for reporting errors in rent or utility ledgers.

Thank you for your time, attention, and continued support of residents who depend on this program for stability and safety.

Response: Commenter contact info was gathered and appropriate leased housing staff conducted follow-up.

Comment: S. Rent Determination (pp. 27-32) See comments elsewhere regarding challenges with ever increasing market rents and limited Section 8 resources (and squeezed tenant incomes).

Response: Thank you for the comments.

### **Leased Housing Administrative Plan**

Comment: Proposed Changes in Section 8 Administrative (Admin) Plan

3.3.5 (p. 24) -- Revises the Super Priority for the Foster Youth Initiative (FYI) to provide for this if the participant is actively engaged in an FSS program or has completed the program. This tweak makes sense.

Response: Thank you for your comment.

Comment: 3.3.7(a)(2) (p. 34) -- This revises the Elder Preference in several ways. It makes clear that it applies to federal public housing units converted to rental assistance through the RAD or RAD/Section 8 blend process as well (in the past, some former elderly/disabled public housing developments were only switched through Section 18 (such as Amory Street and Patricia White), and not through RAD). It also makes clear that the preference operates in a manner similar to the public housing Designated Housing Plan (DHP) that previously applied to these sites, i.e., 80% elder preference and 20% non-elderly disabled preference. Subject to general concerns regarding whether federal proposed changes in the Continuum of Care and Permanent Supportive Housing programs require BHA/City rethinking about strategies to best serve elderly and non-elderly disabled populations, and the elimination of Mitigation Vouchers (discussed separately), this is fine. It is also a reminder that the Designated Housing Plan (DHP) is coming close to the end of its term and will need to be renewed or extended, but that is on a calendar separate from the PHA Plan.

Response: Thank you for your comment.

Comment: 3.3.7(a)(3) (p. 34) -- As provided above, this provides for the 20% non-elderly/disabled set aside at federal elderly/disabled developments converted to Section 8, similar to their former treatment under the DHP. We would recommend that BHA add parallel language here to the change in 3.3.7(a)(2), i.e., that this also applies to developments converted through RAD or a RAD/Section 18 blend, in addition to any Section 18 conversions.

Response: Thank you for your comment. We have updated the language to reflect this change.

Comment: 3.3.7(b) (p. 34) --This changes the language regarding the Emergency Housing Voucher (EHV) program and creates a preference for those who may be losing EHV funding. First, it changes "shall" to "may", leaving this to BHA's discretion. Second, it provides that it may be a gradual shift of funding based on BHA's financial judgment. This is broken into categories for both families and singles. BHA staff explained to the RAB at its November 2025 meeting that (a) the family preference was higher since it will result in a larger financial impact (EHV spending is higher for families than for single persons) and (b) they wanted to fully spend out the EHV funding while at the same time avoiding displacement, so providing discretion as to when to shift families over could best achieve both of these objectives.

Response: Thank you for your comment.

Comment: 3.3.9 (p. 38) -- This revises the points for a Section 8 Project Based Voucher (PBV) participant exercising Choice Mobility to obtain a tenant-based voucher from 95 to 120. Moreover, the 60 points previously assigned for Mitigation Vouchers have been removed. The Mitigation Vouchers are part of the BHA's DHP and were for those non-elderly disabled applicants for elderly/disabled public housing who have their housing offers delayed by operation of the Elder Preference. What is the reason for the elimination of those points? As discussed under the Supplement above, we do not believe BHA can simply eliminate the Mitigation Vouchers without developing an alternate strategy. We understand that given the Section 8 funding shortfall, there may simply not be vouchers available for this purpose. There should be further discussion of this item with stakeholders.

Response: The BHA acknowledges that the current Designated Housing Plan extends through March 2027 and recognizes the importance of advance planning for any future revisions. The BHA will comply with HUD requirements regarding submission of any new or revised Designated Housing Plan prior to the expiration of the current plan. The number of mitigation vouchers and time frame were exhausted.

Comment: 13.4.2(f) (p. 148) -- This adds a new category for exclusion of certain Section 8 voucher households from being terminated for insufficient funding, after other categories, where the landlord has agreed to a certain percentage reduction in the contract rent for units in all neighborhoods for at least a year (or the period of hardship), and there is further discussion of how this is intended to work in n. 21. This is an intriguing concept but needs further discussion. For example, is this solely for BHA units, or would the owner need to do the same with non-BHA units? Does "all neighborhoods" include areas outside of Boston? What if some units are in Small Area FMR (SAFMR) areas where the rent dynamics may be different? What if there is a very large landlord and there is some justification for not taking this approach for all units (such as underwriting concerns with LIHTC or subsidy layering)? It is a good idea to establish an incentive for cooperative landlords who are willing to "share the pain" during times of austerity. Additionally, BHA should rephrase some of the wording in this section (replacing "Any Family whose owner voluntarily[...]" with "Any Family residing at a property where the owner voluntarily[...]" or similar language) and revise the section references in Footnote 21 to replace "categories listed in section 13.4.4 (a) - (f)" with "categories listed in section 13.4.4 (a) - (e)".

Response: Thank you for your comments. This concept is not intended to apply to BHA only units. It is intended to apply across all neighborhoods to any landlord. BHA will consider the remainder of your comments with regard to this process.

Comment: 14.7.6(c) (p. 176) -- This adds language regarding permitted use of VASH Administrative Fees, including various owner incentives to participate. Use of admin fees to incentivize VASH participation seems prudent, as long as it is balanced with other needs that would support participants. BHA could also use these funds (up to one

month's rent) to help landlords pay for any repairs that are needed in order to address HQS/NSPIRE items identified in the initial inspection.

Response: Thank you for your comments.

## **Operations**

Comment: 2026 Federal Annual Plan Comments regarding Commonwealth Development in Brighton, Massachusetts 02135

John Lewis states: "Do not get lost in a sea of despair. Be hopeful, be optimistic. Our struggle is not the struggle of a day, a week, a month, or a year, it is the struggle of a lifetime. Never, ever be afraid to make some noise and get in good trouble, necessary trouble."

1. Open all the High-Rise Family Buildings Trash Chutes at the Commonwealth Development in Brighton, MA 02135.
2. Daily mopping at all the High-Rise Family Buildings, elevators floors, front and back hallway floors, and back stairwell at Commonwealth Development.
3. Heating for all Residents, new Honeywell thermostats that can be-regulated by the Residents.
4. New Windows with better ventilation that do not sweat in the hot and freezing temperatures (? mold).
5. New Elevators for all the High-Rise Buildings. The elevators breakdown weekly and sometimes daily, and the elevator ceiling fans has not worked for 11 years, or more. Residents are often locked inside the elevators when the elevator is stuck between floors, and there is poor-no air circulation.
6. Additional Street lighting throughout the property for the Residents' Safety.
7. Additional lighting on the property grounds for Residents' Safety.
8. When BHA enter the resident unit for repairs, and the resident is not home, BHA should leave a note stating why they entered the unit.
9. Safety Concern: Residents must have camera access to see who is ringing the doorbell to get entry into the building. Vandals are ringing the residents' doorbells throughout the night-time.

Response: Thank you for your comment. BHA will carefully consider all of the proposals above.

Comment: S. Operations & Management (pp. 33-38)

On p. 33, for Charlestown, Mildred C. Hailey, and West Newton/Rutland, there should be a note that there are some Mixed Finance units which are not managed by BHA.

On p. 36, the text to note "\*\*\*\*" has been deleted. It's likely BHA planned to replace it with other text. On the same page, note "\*\*\*\*\*" has changed text regarding whether

the ROSS program may stay at several sites. Originally it said that BHA might change the ROSS grant for both Mary Ellen McCormack and Hailey due to subsidy conversions (and possibly use the ROSS grant at a different site), but now it appears that's only the case at McCormack. The key below the table includes a note referring to modification of a "250 target", but that figure has been replaced in the table with "961". It would help to hear more of BHA's thinking on this.

Response: BHA will apply for another 3-year grant for the Resident Opportunity Self-Sufficiency (ROSS) program. At the time, BHA is exploring what sites will be included in the grant as some ROSS sites go through redevelopment. BHA will include the family Public Housing site of Commonwealth.

To clarify, 250 is the target of residents BHA wants to become participants in ROSS programs for 2025-2026 (10/1/2025-09/30/2026) either on-on-one with Service Coordinators or at any ROSS event (computer classes, job fairs, etc.). 961 is the number of residents who have received ROSS services, referrals, or resources during the year period (10/1/2024-09/30/2025).

Comment: (Ops/Asset Management) S. Pets (pp. 64-65)

As GBLS has encountered at Hailey, there can be significant issues where a site is switching to new ownership/management, ensuring that existing residents' arrangements can continue but that vaccination, licensing, or other reasonable safeguards are in place. This is particularly true where existing BHA pet/animal records are incomplete or out of date. More work should be done so that this doesn't become a last-minute scramble with residents fearful that they won't be able to keep their pets or support animals. Note that this includes a number of different issues. For example, if a PBV owner/manager has a more restrictive pet policy than BHA, then an otherwise returning resident may face hardship if the new owner/manager refuses to allow them to bring pets that were formerly allowed by BHA. Similarly, more restrictive policies regarding subtopics, such as a different suite of required vaccinations, can create an impediment for returning residents. BHA should ensure at minimum that pets allowed by BHA will be grandfathered in at newly converted properties.

Response: Thank you for your comment. BHA will carefully consider all of the proposals above.

Comment: S. Community Services & Self-Sufficiency (pp. 46-50)

As noted in the comments above, BHA should make sure that as many of its initiatives and partnerships as possible are open to Leased Housing participants and are not limited to those in public housing. This is particularly important as more units transition from public housing to other forms of subsidy.

Response: Thank you for your comment.

## **Public Hearing / Process**

Comment: Yes. Okay. I don't know if everyone's aware about the transfer policy that's taken place in the new plan, but it's a good change. They're actually going to change the policy in the part that I'm going to speak about is that they're going to start moving the people up that are on the waiting list instead of moving people that are on the street and taking all the people that are on the street first, they're going to actually start taking people who are currently on the waiting list and stop moving those folks up. And so I'm supporting that act of the back portion of the plan that they're actually asking HUD to approve. And so I'm just letting everyone know that that's part of the plan that they are asking HUD to approve. So if you haven't read that part, I'm asking everyone to also ask and support BHA in asking HUD to approve that.

Response: Thank you. The BHA is changing its transfer policy to ensure that especially that residents that have disabilities that reside in BHA public housing that require potentially a different unit, the BHA is making sure that those resident transfers are prioritized in it's proposed policy. And so we are looking to make sure that those folks don't have an extended wait for transfers. And so thank you for your comment. We'll respond to that comment in writing and when we publish our annual plan.

Comment: Hi everyone. About the section eight, they should verify our income right on time or they should explain to us what happened because for me I did send it to them but they never read it and I will send back to them to rehearing the section eight, but they never sent me back the paperwork, only the public hearing. I thought the public hearing is about the section eight so they could help us to understand what the section is really important to us. They couldn't cancel without where our income and we are from homeless without housing.

Response: So if I understand you, you submitted some paperwork. Staff took down commenter's contact for follow-up. So just on that particular comment, we do address customer service in our annual plan. And so I think the BHA really does aim to be as responsive as we can. If folks in the room or residents or section eight participants and you are having trouble reaching out to whether it's your manager or your housing specialist, please don't hesitate there to call the 617-988-4000 number for BHA information and so that whatever your issue might be escalated.

Comment: Hello, it's me again. So a comment I would like to make is I was curious as to why some elderly and disabled development do not have security. Security is a concern, especially at my development. We have been advocating for access to security for quite some time and we haven't seen any progress of any kind. Is there a reason why our development in the north end has not been allowed to have security while other developments have access to a security?

Response: Thank you. Okay. I will say that the BHA is doing a lot of work with its public housing developments to introduce technology that will make the buildings more secure. So we've spent quite a bit of dollars on door entry systems that allow for video so we can see who's entering. We're also doing a lot of work around door sensors so you can

tell if a door has been propped open. Additionally, we are doing a lot of work to install cameras and especially in our elderly disabled development and we're working with a new camera vendor to make sure the cameras that we have installed throughout the BHA are working all the time and if they're down for whatever reason they're being repaired. So we're very focused on security from a technology perspective. We're also working closely with Boston Housing Authority Police Force.

We're always looking to see how we can grow the number of police officers that we have on the force and just make security generally more effective. So I think there's a lot of things we're doing on the security front and I think we're also thinking about what is the best way to secure a building, whether it be safety officer or some implementation of technology or regular patrols from either Boston Housing Authority Police or Boston Police. But again, just always thinking about security and safety and then also somewhat it's neighborhood dependent, but I can assure you, we are always thinking about the safety and security of our residents.

Comment: Can you give us a brief summary about what it's exactly we commenting on policies or plans?

Response: There's a lot of changes. So what I would say is rather than me going through the entire annual plan document, I can get a few key points. I think one of the biggest changes is around the transfer policy which affects the BHAs internal residents. And I described it briefly before, but essentially what's going on is that we are making sure that folks with disabilities that are in a unit that might not be appropriate for them, that those folks, their transfers are going to be prioritized over other folks or they're going to be basically come to the top of the list to make sure that they're not an extended wait time for their transfer. Now there's lots of different changes. Is there anything in particular that interests you about the Boston Housing Authority?

Comment: I think for me, excuse me, what equal opportunity housing really means? I think it means something different for at least I know the banking is an equal opportunity, but we all know in actuality what happens on the ground is different. And so I think I know for me, I'm not a person that's an addict or in recovery or any of things like that. And so if you're going to be equal, I think for me if I mess up one time I lose my housing and I know if someone else who's an addict mess up and they get to come back and over and over, I'd like to see somehow if we're going to say equal, then it needs to be equal. I also would like to see that I think solar energy or renewable energy be because I've been trying to get my landlord to do it.

The whole block I live on is low income housing and I've been trying to get my, because everybody in the building falls under the category that it qualifies for that we put solar on the roof. I'd like to see the city or the state work with the landlord, find out what the issues are that's preventing them from using solar energy because we're going to be priced out. What's the point of having low income housing if at the end of the day we can't afford to pay the utilities to live in these? And so that's something I think I'd like to see more of working with landlords with. And also rent. I think I was living on NASA and



my rent was 2,300 a month. It actually, and the landlords signed up for an increase and they asked for permission to ask for increase, but I didn't know it was going to be done public. And so I think that I'd like to see more of working with landlords on those things and because some of the people who have jobs, what is your rent going to be like at the end of the month than you have to pay if your income doesn't reach that we're kind of defeating the purpose here and all the way around. So to me those are some of the issues.

And I think also too, I think putting people in the right living situation because I lived in housing at one time that was full of people dealing with addiction and recovery and as an immigrant it became risky and especially now, I think immigrants have concerns about living in housing, Boston housing now we have no idea, no one's telling us what's going on, what would happen to us if we just vanished. If the landlord keep collecting rent for us, how would you know? And so all of these things are policies that I think need to be addressed on our side. What is the state? And the state is not telling us anything about what it's doing on immigrant's behalf to kind of, I dunno, mitigate the fallout of vanishing people.

Response: Are you a BHA participant or what do you mean? Do you participate in one of BHA's programs right now? So just let me speak to some of the things that you mentioned. Okay, that was a lot. Number one is around the equal opportunity point when the BHA is going to either consider someone's eligibility for admission or potentially there's an issue that comes up and we might have to terminate the subsidy. We are very understanding of people's backgrounds and where they may be coming from in order to participate in our programs or the things that might be, or the circumstances that might be occurring. And our job is to house people. It is not to terminate people's housing or make people homeless. We are doing whatever we can to kind of get to yes in terms of housing people or helping people retain their housing.

Now there's certain circumstances where there's a lease that must be upheld or there's program rules and in some cases those rules require that we terminate somebody's housing assistance or require that we move towards eviction. But wherever we can, we try to make an agreement or consider whatever circumstances might be there that would allow that family to continue participation. So when you think about equal opportunity, I think that's kind of one lens that we're kind of thinking about it in terms of how do we consider the individual circumstances of each family or participant when we're making those really serious life-changing decisions. And then on the rent piece, in terms of our programs, we want to make sure that the housing we provide is affordable for our participants and our residents. So that means that the programs are structured in a way that folks pay 30% of their income towards rent on a monthly basis or rent and utilities.

We don't have a lot of power to kind of control the rents in the region unfortunately. It's just market forces that continue to drive rents up and unfortunately Boston is one of the most expensive cities in the United States to live in. So that's why we continue to advocate for more housing opportunities for folks, whether it be vouchers or public housing units or now we have a city funded voucher program that's active as well. So just wherever we can provide opportunities so that people can actually live in the city

and it'd be 30% of that monthly income-based rent, then we're trying to support that and grow those opportunities.

And on the green energy piece, I know there's lots of different things. The BHA is always thinking about sustainability. We're trying to work in line with the mayor's goals to be fossil fuel free by 2030. We're doing some interesting programs on the section eight side where we're incentivizing landlords to have their apartments be more efficient. So that would kind of bring down the utility costs in those apartments. There's a lot of things we're trying to do to move those things forward and some are more effective than others.

Again, there's some things we can do, we are looking at offering rent incentives, so slightly higher rents for landlords who are interested in making their apartments more efficient by using potentially electric heat pumps for example, or solar capacity. We are looking at those types of programs which are not part of the regular federal program. They're outside of the federal regulation. We're looking at how can we be creative to incentivize landlords in the BHA's programs to utilize those incentives. We're always thinking about how we can make housing more sustainable too at the BHA.

Comment: Wait a minute. Yes sir. The other thing was rent stabilization and control. Rent control are kind of in the same room and so it's any part of BHA that can direct people to, okay, we don't do this, but we can direct you to someone either in the state or at your town that can help you, I think get some of the answers you need.

Response: Again. So the BHA provides subsidized housing. On the issues of rent control and rent stabilization, it would be more of a city and state government policy issue to chase. It's not really the BHA that's taking up those issues.

Comment: At the end of the day you will only get so much federal dollars and if the rent piece is increasing, then what that means is you'll be cutting back on so many of the housing programs. And so you can't just completely throw your hands up in the air.

Response: Well, there's certain things we can do to try to make housing more affordable, but by thinking about how much resources are afforded to each family and we can think about it in that way. But you're right, the federal funding is not unlimited. And in fact, if you think about the voucher program nationally, only one in four people that qualify or households that qualify for the voucher program, in fact actually can receive one. The need far outstrips the resources.

Comment: Hi. So I am a public housing tenant on the state side and I have three comments. So in terms of on the state side, I am wondering if BHA would consider recertifying on a biannual basis because I know, well I don't, what is it? E-O-H-L-C-I call it? I still call it D-H-C-D. I know that they have already made provisions that on the state side we can be recertified bi annually. So I would like BHA to consider that. I would also like in terms of notifying tenants about inspection visits, I don't know if this is something that needs to be covered in the annual plan. It is just another policy decision. But I would be grateful if you all would notify tenants by text instead of always

putting letters in our doors. So if people opt in or opt out, then if you would notify us by text, I would appreciate that.

I have a comment about the RAB, the resident advisory board. I know that HUD has made provision that the RAB must always be elected, but I know that HUD also allows for the RAB members to be appointed as well. So unless I'm mistaken of course. So I am wondering whether BHA would consider also looking at appointing RAB members in addition to electing them. I am a member of the residence advisory board as are other members here. If you are a tenant of Boston Housing, whether you are section eight, in an elderly disabled development or a public housing family development like Cathedral, like I still call 'em, by old names Ruth Barkley. Once you are a BHA tenant, you are eligible to be a member of the resident advisory board. It is a board and it is a mandate given by the federal government. The federal government has told all the housing authorities that we are mandating it that you have a board of residents who will help you and advise you on the annual plan, which is why we are here today. We have met Boston Housing has come to several of our meetings and discussed the plan with us. And they have to do that by law. They are mandated by law to do it. They can't just change things at the BHA and instituted without meeting with the resident advisory board. So it is very important for everyone who is a public housing tenant to become a member of the resident advisory board. The elections are held every three years right here.

Most times the election meetings are here. I think I'm correct. The meetings are sometimes held here. No, because the last time it was at the Bolling building, it was at the Bolling building, but for years it was held here. Anyway, the elections are held every three years and groups of tenants from all over BHA come and they elect representatives. That's how with this group was elected. And we are there for three years. And if I may just tell you that the board is made up of 10 representatives from section eight, 10 from family developments and 10 from elderly disabled developments. We meet the second Thursday of every month from six to 8:00 PM and we discuss BHA policy. So if the BHA wants to change rents, they come to the board, we talk about it. Sometimes we push back and then we say, no, no, no. And we push back and that is what the resident advisory board does. And there are some perks you get to travel to conferences in nice hotels. This is the perk. But you also come and you get involved in policy on a housing side. So we are inviting you to come if you want to come to the next meeting, this is at Bellflower development close to Andrew Square. And if you want to come and you contact, we have a liaison. If you contact somebody at the BHA and you just call, I'm not giving up numbers now you call the BHA and you say, I want to talk to the rep, they'll transfer you to the person and tell you want to come to the meeting. We are necessary. So we are inviting all BHA tenants who want to attend. Thank you. Thank you.

Response: Thank you. I am not so familiar with the changes on the state side EOHLC if they're permitting biennial recertifications, but I can tell you that if they're permitted, we can get there.

On texting, I think that's advantageous to everybody, including us at the BHA as well as the residents on the inspection notifications. We're actually working on something, and this is not necessarily a policy change, but we're working on something to use the One

Call Now alerts that we have to send a notification about inspections. And so my chief of maintenance is working on how to coordinate the inspection notifications with One Call Now. So you can get either an automated phone call or a text about your appointments. So hopefully we can get that working in the next year, so hopefully sometime in 2026 we'll get that up and running.

And then I'll look into your comment about appointments to the RAB. I don't know, I don't know the answer to that, but we'll look into it and respond more fully. But thanks for all your work on the RAB and thanks for your back and forth with BHA. We appreciate that.

Comment: Okay. I'll try to do it from here. Okay, so I just got a letter from Social Security that I'm going to stop back paying my health insurance. So I pay a portion of my voucher. So will they, will my voucher go down? Go up? I dunno you have anything to do with that?

Response: Well, I think it depends. I'd need to see the specific letter in order to figure that out. But if you did want to talk to staff over here about the specifics of that and we can work that offline and figure out your letter and where if your rent share is going to go up or down based on that information. Staff gathered commenter contact info for follow-up.

Comment: I'm back attending of BHA, but I have a quick question. This happened this year, which is the inspection of the BHA already. I don't know what happened to all the tenant, but BHA already have the inspection every here and you. But the city bought the city and send the letter for us and to need to have the inspection again. And then, which is I would call BHA inspection department and which is they give for information and send it to me and submit to the modern ISD department of the inspection. And then they say, oh because the BHA is what a different inspection with the ISD with the different, I say what? What's different? I asked the question, what is the difference?

All the PO just want to be a city for a tenant living or the house. And then they say because the BHA different department, the city want to make sure also the city for tenant living. Yes, I said all the same. But the department of the BSA told me if you have the inspection report already have inspection. So you submit to them it will be okay, they will be accepted. Which is I submit to them, they rejected and then they put on because after when they come to inspection, I say, already submit the document and why you come again. And that's one of the inspection of the ISD, inspection of the 10 miles and then come and then just want to consistently get to the house anyway. And then I say, oh you know what? I already submit all information And then I didn't expect the day when to come today, but my daughter was not very sick and my father did have a surgery, her surgery inside.

So I already been already documented and sent And then they sent and after that and then they sent me the penalty. They live in penalty \$400. And then I went to the 1010 city address, one of the lady, I forgot the name, but in that department and they just speaking very disrespect, say, because you have to be, we have to inspect anyway. We have to make inspect anyway, otherwise you pay for penalty. If you don't pay for a

penalty for now and then later on it will be increase in the budget. I said, oh my god, what happened?

Response: So I'm going to ask you to give your address to Katie so she can help troubleshoot it because it sounds like a specific issue with your apartment. So I just staff to be able to help you with your inspection issue. I understand a little bit of it, but I think we're going to need to look at the letters that BHA sent you to figure this out. Staff gathered commenter contact info for follow-up.

Comment: My only question is how the different from the BHA and how the ISD for the inspection.

Response: They're two different departments. So BHA, we come out and we inspect your apartment. We come now every other year. And so we come every other year to make sure that your apartment is in compliance with all the rules of the section eight program. That also includes the city requirements. Okay. Now the city has its own inspections department. It's called ISD and they're based on 10 10 Mass Ave. And they come out if there's a safety concern, but they also come to do initial occupancy inspections. The two departments will work together sometimes, but they are different departments altogether. ISD will inspect every apartment in the entire city, especially where there's a safety concern. The BHA only inspects its own apartments or the ones that have a voucher.

Comment: But they say just a random selection.

Response: We can try to connect you with them, but I'm not really clear on your comment. We wouldn't have a lot of information about that. You would be able to find out more from 1010 Mass Ave. Thank you very much. Staff collected commenter contact info for follow-up.

Comment: Good morning. Morning. The reason why I'm stand up here today, I have a friend right now who's at RDA Boston. They're trying to vacate her, right? And she's been there for about a year now. Right now the whole thing is her being here for a year, there was no problem with her being there or anything like that. So basically what I'm saying, what I'm trying to say is that there were other people that I live at, so there's other people who have got evicted with payments or maybe six, 7,000. This friend I have, she only owes 800. I think it's easier.

Response: Staff gathered commenter contact info for follow-up. I'm going to get all your circumstances and we'll try to figure it out.

Comment: Good afternoon everybody. I just want to say thank you to BHA for the upgrade of the re-certification yearly for people financially that have jobs starting different amounts, things like that or whatever students in the house and things like that, that they don't have to do it every time that they get a rent. Well, an increase in their payment or whatever it is that they can just do it now yearly. I like that part. I just wanted

to say thank you with that. And can BHA send some kind of petition to Mayor Wu. Hear me, Ms. Wu and ask her for rent control. That's it. Thank you. Have a night.

Response: Thank you for the comment.

Comment: And do the plans have anything for specific housing developments?

Response: Yes. You'd have to look through the plan. There's different parts that it speaks to certain developments.

Comment: What does the owner of the house where I live at have to do with my social worker? I have section eight and I wanted to know what the owner of the house has to do with my social worker, basically that why doesn't he just come to me with certain things instead of going to my social worker?

Response: The housing specialist, if you have a voucher, maybe you have a housing specialist. I think the easiest way to solve this problem, which is not necessarily related to the annual plan, would be for me to connect you with somebody from the Section eight, the voucher program. So I'm going to go ahead and just ask you if you could go ahead and provide your email and your contact information so that we can get back to you with the appropriate person that can help you with your question. You can also email me. I'm putting in my email in the chat for follow-up as well if that helps.

Comment: Great. I'm looking at this. It's not on the capital planning, I apologize, but I do have a question. I noticed that some developments have security officers on property. I know given the financial situation in Washington, what are the chances of Commonwealth having such a person or is there such a thing as better security for various developments that may see problems?

Response: Yeah, it's a good question. I'm happy to talk about safety and security. Number one, the BHA is obviously very concerned and certainly wants our residents to be safe and secure in BHA developments. And with that being said, we're doing quite a bit of investment right now into safety systems at the buildings. We're working on door entry systems and door alarms to make sure that the doors are not propped open, but also that the people who are entering the building are only BHA residents and their authorized guests. We're also doing some work to install more cameras at the BHA developments in addition to fixing those cameras that may be offline. We've recently entered into a relationship with a company that helps us fix our cameras. We've also done training with our internal electricians to be able to wire new cameras and bring cameras back online. We are also working on centralizing that network, making sure that the Boston Housing Authority police have access to the footage when needed to help us with enforcement and also to make sure the buildings are safe and secure. We're taking an active approach to technology to help the buildings be safe and secure. We're also looking into how we staff all of our buildings, meaning when do we have safety officers or police officers patrolling the buildings during what hours, what hours do issues arise for our residents and how can we better ensure that all our residents are

feeling safe and secure? Part of that is not just the BHA plowing ahead with what it thinks is best, but also speaking with the residents, not only at Commonwealth, but at all the sites to figure out where we can meet. Obviously as you referenced, we don't have endless pots of money to be able to provide an officer or a police officer at every building, but we certainly want to make sure that our residents feel safe and also heard on that issue.

Comment: The reason I brought it up was because a few residents, including myself, have noticed that when we are coming home, there are other people rushing up to come in the buildings behind us. We don't know these people. I feel a little uneasy. And a lot of them are seniors, and it just would help if someone was there or we were assured that the cameras are actually working, which I don't think they work. We are rushed into our buildings by other people trying to get in. I was just basically saying that many residents such as myself are feeling like we're being pushed into our building when we're coming in, when we're coming home because people, I mean, they see us coming in and they come in right behind us, if that makes sense. And we don't know that they live there. We're just being rushed into our building. We're saying to people, you can't come in. So I don't know if the cameras work. It doesn't happen all the time, but it's starting to happen quite often. It happens when it gets dark mainly. Right now I came home this evening, it was dark around 5:30-6. And my neighbor. Yeah, my Commonwealth neighbor wanted me to say that too. It happens to her often. She's afraid to say something. She thinks they're going to hurt her.

Response: It's a problem. I can assure you that I meet weekly about camera systems at the BHA. We meet with the police, the BHA police officers and also the staff from the IT department that install the cameras and our electricians and we are checking, we have a list of cameras that are not working and we're making sure that if they're not working, that they are working, but also working with the police to determine if there are areas that are not visible by cameras that we install new cameras to make those areas visible. I will put it in my notes to work on Commonwealth. Thank you. And I hear you on the issue of people following you in the buildings, which is I think a problem at a lot of developments. And again, I think we have to figure out how to solve that one. Hopefully we can have more patrols, especially in the evening hours to hopefully make you feel safe and secure.

Comment: Hi, thank y'all so much. I'm a section eight tenant and I was just wondering when I review the plans, a lot of the stuff is for people in the developments as they do need it, but I'm wondering when it comes to the section eight tenants, what's really changing for us or how are we going to benefit from these green initiatives and all these other things that are in this five year plan? But I'm not attached to a voucher. I can't partake in a lot of opportunities at the moment. So just as it relates to y'all, the five-year plan that I had seen, I was wondering and the other ones what relates to Section eight tenants seeing as we fall under Boston Housing Authority. But I have a hard time reading through the policies to find what applies to me and what doesn't.

Response: I think there's not been a lot of changes this time around with respect to the Section eight program and the annual plan. A lot of the changes when you look at the annual plans have to do with how the BHA is planning to spend its money at the developments and the construction. So you're right about that. And some of the major changes to the policy this year are related to admissions and eligibility and not so much related to the ongoing participation of Section eight participants. Are there any particular changes that you're interested in?

Comment: I mean a lot of things in terms of opportunity, I can't really go back in the city due to income limits. It makes more sense for me to be out in Canton. I do a lot of historical research and policy research on it. So where I live is strictly based on what I want to provide for my family and what I want to do, but when it comes to certain initiatives, I have to make it back to BHA and they say they're more than a housing authority, but it doesn't feel like that when you're a Section eight tenant who utilizes BHA. So I do think that opportunity access to opportunity, I did mention I'm interested in the RAB board, but they're going to discuss on what y'all present them and probably other things. But this is five years that I now have to wait for something and hope there's a lot that need to change, but I'm not going to talk about that. This is about the next five years that I just have to, what do I do?

Response: I think to speak to your points about opportunity, I would say that the BHA has a few programs that could be potentially helpful. Number one is the FSS program, that's the family self-sufficiency program. And that is a program that helps folks who have increases in earned income to build up a savings, an escrow account. And we also have a robust Section eight to home ownership program that can also potentially be something that you might be interested in. These programs are listed on our website if you wanted to learn more about them. I'm also happy to get you in touch with somebody to provide you more information about those programs. If you wanted to email me or put your email in the chat. I was just putting the family self-sufficiency link into the chat as well. Was there anything else that you wanted to ask right now before we go to the next speaker?

Comment: I'm enrolled in those things, so I'm happy. I do want people to know about them, but just putting me in touch where maybe I just speak with you about my further concerns. Thank you.

Response: That's great. Thank you. I appreciate it.

Comment: Good evening. How you guys doing today? Happy Holidays. I'm a Franklin Hill resident. I filled out for my housing through a Boston Housing application. I also was able to receive housing through a Boston housing application. I just was never informed as the one that has to live there that you guys switched it over to private management, which has their own policy, procedures and curriculum and it's hurting us because now we have to follow new regulations, policies, procedures, and then the difference is when you do have an issue problem, nobody's there to help you. You're spinning like a carousel and nobody's there to guide you, say to you, tell you things and it's really a hurt



because I'm not familiar with Boston Housing working in this way. We always communicate with paperwork. That's what I get when I have to deal with people that's in position of authority. Silence.

Response: Okay, thank you for your comment. My understanding is you live in a building at Franklin Hill where there's private management, correct?

Comment: Well, it's Trinity Management, but like I said, whatever this plan is on five years, 99 years, it was never disclosed to me and I wouldn't have been able to refuse housing because I've been on the house only since 2005.

Response: What I would say is you have some issues it sounds like with the current management and their lack of communication. The best way to deal with that is if you'd like to spell those out, if you want to provide your email or you can email me with my email in the chat to spell some of those problems out and we can try to solve those problems. But if you have any particular comments about the annual plan itself, I could try to be responsive to those either now or in writing.

Comment: I would appreciate that greatly because I have went through my funders, which is HUD, on the pretense of just being able to get the compensation of daily living and quality of living on behalf of HVAC heating, ac. They made me get a reasonable accommodation for a filter just because I do deal with illness and at the same time we have carpets in common areas. I've been there since 2016. It just took to this year for the carpet to get cleaned when it should have been taken up, up. I don't know. But it's getting worse and I wish you guys as the one that ran the property before it got reconstructed, would've notified people that this is going to take place. We would have to go through Trinity management, but you guys need to send out one year liaisons so you can see in living color that this is not a soap opera, this is not a fairytale. This is truly happening and unlike anybody else, this is wicked. This is wicked. And you don't have a good fairy and you don't have a bad fairy. It's just nobody seems to be caring when I'm not used to Boston Housing curriculum being like this, I don't mind stepping up to do some of the things more or less need to be done.

Response: If you add your name and email we can follow-up offline. My name and email are in the chat so you can contact me.

Comment: I'm speaking with her because I got her on my thing. She doesn't do internet or nothing like that. What the problem is, is that when she first got her application for Boston Housing to go to Franklin Hill, what happened was they called her and she went to Franklin Hill. Then they didn't tell her that Trinity Management was taking over the property. So what's now happening is she's in federal funding. We're trying to get in touch with somebody from Boston Housing because she's in federal funding unit and they're not responding. And I know the person, I've been trying to get in touch with him because there's certain things that they're not doing in her unit that needs to be taken care of. I know here for the annual plan, but somebody, she needs to find out who she can get in touch with to resolve these problems. Because right now she don't even have

no heat in the bathroom. They didn't do it and usually it used to be annually, twice a year they clean the filters.

Response: Well I do appreciate that and I can circle up with appropriate staff to respond to you.

Comment: Been There, done that. I talked to the secretary. Alright, I've been there. I've been doing you guys job. I love Boston Housing Authority. I'm a Bostonian to the bone, but all this patty cake and then back and forth. I'm not looking for Ringling Bros Circus. I need a human that's willing to do the JOB. It's getting tedious to my mental, it really is. It's getting tedious to my mental because you guys don't work that way.

Response: Okay. Where it's at a public meeting, let's try to understand your problem. I'm going to work with you to try to solve your problem. I'm not going to solve it tonight. I understand your concerns. Staff work with me and I can convince staff to tell me the story and see what's happening. You're also, you're a resident of the city. You may, if you have issues with the way the apartment is being maintained and you're not happy with what Trinity Management is doing, you may call 1010 Mass Avenue for Inspectional Services.

Comment: I did all of that. I got my proof, I got my paperwork. We didn't even have an annual inspection this year because I have fire sprinklers overhead. I have a neighbor overhead that has young kids that jump and bounce like they on a jumpy bin. I'm being honest. Please somebody give me a good half an hour. I'll show all my paperwork of what their responsibility is and they haven't done it. Okay. I can do better with a cardboard box and a trash bag. Okay. Yes. She's really upset.

Response: Okay. No, I can tell. I'm sorry. Let's exchange contact information through the chat.

Comment: Yeah, well staff has my email. I've been contacting him. He's not emailing me back. Then we got in touch with his secretary. She called back.

Response: Let's start there because I don't need to know all the details. I'll start with staff and we'll get somewhere. We're going to go ahead and reignite that communication. I promise you you'll hear from us very shortly. Okay.

Comment: I appreciate that. I would appreciate that.

Response: Sure.

Comment: Wow, you guys got your hands full? No big deal. You have so many developments. I didn't know there was a whole bunch of different developments involved at one time. I think you guys need to separate it. Each development has their own issues, but can you guys hear me?

Response: Yes. I'm listening.

Comment: Okay, but back to my questions were about RAB. Do they get the most votes on what's going on in each development because they're RAB, the resident advisory board. Yeah. Do they get all the say so about what's going on in each development because of their 30 board members or whatever?

Response: The RAB is an advisory board that gives advice. I think what we try to do is when the folks who work at the BHA want to make a change to anything, we let the RAB know what we're thinking before we do it. And we really like to listen to what the RAB has to say because we're making these changes that's going to affect the residents and the participants of our programs. And so we listen to their feedback. The RAB agrees with a lot of what do. Sometimes they disagree and they provide us with comments that make us change what we're thinking. And so it's really a back and forth and we certainly value the opinion of the RAB and we look for their input. And so the RAB doesn't make decisions, but I can tell you that we very much value them a lot what the RAB has to say.

Comment Okay. My next question is, there's 30 members, right? Are they each from each development that are in concern?

Response: Well, I think what was laid out was that there were 10 electees from the family developments, 10 from the elderly disabled developments, and 10 coming from section eight. And then there's some alternates as well. They're representatives, so it's not necessarily one from every development. We have elections and the people who come to the elections and say they would like to be a candidate, they give a talk. They say, this is who I am, this is why I would like to be on the board. And then they are elected by their peers. Other family members will choose who are their representatives. Other elderly disabled residents choose who will be representing elderly disabled; other households from section eight leased housing choose their representatives for section eight leased housing.

Comment: One more question and I'll leave you alone. Will there be another meeting like this before the 15th of January? Because I don't know what any of these plans are.

Response: There's not going to be another public hearing. We had an in-person public hearing this morning and we have this on-line hearing tonight. However, you can always take your time and submit questions to us before the 15th of December. We will be responsive to those questions. May not be immediately, might need some time to think about those, but ultimately your responses will be included in the annual plan submission that we make to both HUD and to the Executive Office of Housing and Livable Communities, the state organization formerly DHCD.

Comment: Do you value your word?

Response: Well, listen, in this case, if you submit a question, I am in fact required to be responsive to it. So you can take my word for it or not, but staff are going to make sure that we are responsive to whatever questions submit.

Comment: Hi. Okay, I'm not sure if this is for you guys question. My question is basically I wanted to know, so I live in a building where I do have housing but not a mobile voucher, but the building that I live in is not only just housing, anybody can live there. And I have a couple issue with stuff going missing in the buildings. And my question is basically I don't let you guys say you have all these great things with security camera coming up. Are those also for building that's not fully housing?

Response: When I was talking about safety and security earlier, it was really related to the housing and the buildings that BHA owns. And as far as the buildings that BHA doesn't own, we don't necessarily have the ability to control safety and security at those buildings.

Comment: Okay. So what does that mean for the people that don't live in a BHA building that BHA owns?

Response: If you have a voucher, you can choose to relocate with that voucher.

Comment: So I don't have a mobile voucher. When I had talked to my case manager, she had told me that's a process to get a mobile voucher. So basically I'm not able to move from where I am.

Response: In that case, what you can do is speak with the owner of the building and try to advocate for better safety protocols at the building. Are you in a BHA subsidized unit?

Comment: Yes. But it's a project-based subsidy,

Response: Okay. So, one of the things we could do is we could start a conversation. The BHA could be helpful in talking with that owner if there are particular safety issues that are coming up. But I think it's best that we have that conversation offline outside the context of this meeting. So you can go ahead and email me or other staff and we can circle back with you about some next steps or conversations that we can have and then the particular safety issues that you're experiencing.

Comment: Yes, so hi. Good evening. I was at the meeting this morning at the city hall, but I just participated in the second one because I wasn't understanding that much. I would like to know because what now I'm close like five years with section eight, so I would like to know what next, what's going to be for the next step after five years, I'm going to find some help.

Response: Okay, you want to know what's next in terms of what? I mean you have your voucher, you're living somewhere, you're doing okay?

Comment: Yeah, I'm living in an apartment right now, but every year the crisis, they rent so expensive. So I don't know, after five years, what's things going to be work out for now? Because everything is a little bit changed. I'm not sure exactly what's going on for now.

Response: Well, the voucher is going to remain the same. Unfortunately, the rents in Boston have been increasing for many, many years and there's not much we can do to control that. The BHA continues to increase its subsidy to allow folks to continue to rent in many different neighborhoods in Boston. And so sometimes section eight participants will find that their apartment has become unaffordable because the landlord continues to raise the rent. And sometimes we can work with the landlords, to the owners, to keep the rent at a reasonable level that is in line with what the BHA subsidy is that's provided. Or sometimes folks want to look for a new place to live.

Comment: Looking if I can find new places because the landlord I'm with now is charge me more every year. Now I'm passed like \$2,000 over, so it's really too much for me.

Response: The first step would be to talk to your housing specialist.

Comment: But the problem is every year they change you a new officer so you don't know exactly what's going on. So when you contact them, there's no answer until you close to renew your policy. So that's the only way you can talk to them. That's the problem.

Response: Well I would say if you're looking for assistance to move, I would call the 617-988-4000 number and ask to speak to a call agent and they should tell you exactly who is your housing specialist, number one, but also how to go through the move process. So 617-988-4000 is the general customer service number and it should be able to help you find some of the information you're looking for. Also, if you wanted to ask about the ECHO program, it's ECHO, expanding choice and housing opportunity. There may be some way that the folks that work in the ECHO program can help you find a new place to live if that's what you're looking for. And ECHO has been added, just put a link in the chat.

Comment: Hi, how are you? I'm kind of busy. I'm at work. I can't even really talk, but I have to be in the meeting. So my complaint is about my landlord. I have some small kids and I've been dealing with some mice in my apartment. So since I get there and I talk to him, but it look like every time you guys going to have inspection and he trying to come up trying to do stuff, trying to go crazy. And I was like, I don't know if I have to report that because I talk, oh, maybe I might try to change my apartment to another place soon because in every single day his apartment rent become higher and higher. And right now since I have a job, because working in Commonwealth and the apartment became so expensive for me because I make some good money, but it's just too much every time. I think his apartment is \$3,400, so I'm trying and it's not even clean enough for my kids. I have a four years old and a seven and a 14. So I say, I don't know if you guys can get me a number so I can report that because every time he sends how they

say, and my kids, they're really scared about mice and even me, I'm trying to buy stuff. I'm trying wait, spend my money on the apartment to put some stuff like Handy but doesn't work.

Response: Generally, I would say you can call the Boston Housing Authority Inspections Department if you're dealing with issues related to infestation with mice or anything else or there's other issues with the apartment. The inspectors will come out and they will inspect in the next couple of days and they will cite the owner to make the appropriate repairs. Otherwise, I would also say that if you wanted to start the process of looking for another apartment to start with your housing specialist or call the 617-988-4000 number that I had mentioned before.

Comment: And I have another question. Do you guys help people will try and buy a home in the future?

Response: Yes. Actually, if you go to the chat, staff just put a link in the chat. It's called the BHA First Home. And so if you go to the chat, it talks about the program on our website and gives you some opportunities to see if that might be something that could work for you.

Comment: Thank you. And hello. I work at the Disability Law Center, former BHA employee. Nice to see you again. And thank you for taking all these comments. I have one that's more of a question than anything else that looking at the new transfer categories, I wanted to see if you'd be willing to talk a little bit about how these changes came about, particularly as it pertains to reasonable accommodation transfers. My 2 cents are that having 15 different categories, which is what it looks like it's now going to be, is going to be really hard to make it work administratively. And you have some areas of potential overlap. For example, between T1, administrative medical condition transfer, RA transfer, which is down in T3 and I'm seeing over housed under housed in both under special circumstances and under T2 administrative. So it's a little hard from the outsider's perspective to figure out what's going on. And I was hoping you could just shed a little bit of light on this, particularly with a focus on the RA transfers, which I believe is what led to some of these changes to begin with. Thank you very much.

Response: Thanks. I think that first of all, yes you're right. The policy is fairly complicated and maybe more so than it should be. But I would just say that the BHA has to under the law as related to an investigation from HUD and a voluntary compliance agreement has to ensure that those folks that are seeking a transfer as related to reasonable accommodation are considered emergency that essentially they come to the top of the list. So there's emergencies that might jump over that, but a reasonable accommodation transfer should not fall below any other exigent circumstances. The gist of the policy change is to heighten the points for somebody who's requested a reasonable accommodation transfer so that we can resolve those first. I think historically the BHA tried to rotate reasonable accommodation transfers with new admissions so as not to end up with a lot of vacancies.

I think making sure that the apartments were always occupied at the levels that HUD wanted was at the forefront of what BHA was seeking to do. However, we really have to pay attention to how long people wait. We have quite a long list of reasonable accommodation transfers that need to be resolved. And so that's really what the policy changes are aimed at doing is making sure that those folks are offered units and we work through that list as quickly as possible.

Comment: The question I have, if I'm changing the apartment, do I'll need a new document?

Response: Most likely, yes.

Comment: How can I get that new document? I'll have to contact the case manager to let the case manager know that I'm in need of a new document.

Response: Yes. I don't know what particular document she's talking about necessarily, but if she's a section eight voucher holder and she's moving we'll need some new income probably. There's lots of documents that we have already in the file if that's the case, but we certainly will need new income and proof of that.

Comment: Good evening everyone. Hi. I am new landlord to the system and with the taxes going up, which ultimately affects one's insurance, it doesn't seem as though the rent or the, the portion that the program pays landlord, it's balanced to keep up with the taxes and the insurance. How does that work? I'm not understanding, and I have not even been with the program six months yet, but it's triggering me because I know we are going through another potential tax increase as we speak. I was on a call this morning with the city, so I'm just trying to understand because this is supposed to be a partnership and it just seems very imbalanced as it relates to the changes. So how does one go into this partnership to help those who are unhoused or whatever the case may be without suffering a financial challenge?

Response: Appreciate your comments and also we appreciate your partnership as a landlord in the program. And I'll just say very briefly that the program works in a manner where after one year on an annual basis as a landlord, you are entitled to request a rent increase and the BHA does its best job to set rents within the market. And we have market data that we use in order to determine whether or not a rent increase is considered reasonable. So we do try to work with the market data within each particular neighborhood to allow landlords to increase rents. Obviously that drives the cost of the program and in Boston things are very expensive. Sometimes the rents that we are able to set lag a little bit behind what the actual market is because the market data we are getting has some lag to it. But appreciate your concerns and the tax increases that may be coming as well. Thank you for your comment.

Comment: I appreciate your candor because it definitely is not equal or close to market rate. So this is why I am bringing it up because I want to know are there any plans, how is this addressed or will it be addressed?

Response: Sure. Thank you.

Comment: Okay. First of all, she's saying good evening to everyone and this is her first ever public hearing and she wanted to ask what this meeting is about. Is it for everybody? That's BHA.

Response: Yes, welcome. It's for everybody.

Comment: Hi. I just have a quick question and I hope this is the right place to ask it, but I am currently just income-based. I don't have a voucher or anything like that. So with this change, I know that I guess I will be under section eight. What I was told is that it's not transferable. I can't move. Is that a permanent thing or are there plans to change that in the future? I'm just asking because with the voucher, it's not a voucher. They're telling me that it's switching over to section eight because I'm currently income based. So with it switching over to section eight, I was told that I won't be able to move. So I'm wondering if that's a permanent thing? I'm in Mildred Hailey.

Response: Oh, okay. So you're in a situation in which the subsidy is being converted from public housing and it'll be converted into a form of subsidy that is from the Section eight program. And so it's a project-based subsidy, and it does mean that there's an opportunity potentially when there's funding available to take that voucher and have it be a mobile voucher. After one year, you can apply for that opportunity and then if there's funding available, you could potentially take that as a mobile voucher. When you do convert into that type of subsidy, it does give you the potential opportunity to convert the project-based subsidy to a mobile voucher. You don't have to do that, it's just part of how the program works.

Comment: Thanks. I was actually just wondering if there is going to be any follow-up conversation between BHA and DLC on the priorities, if that's something that it would be okay for GBLS to be part of that correspondence, because we also had some questions, but I'm sure GBLS staff will go into that in more detail.

Response: I am happy to take the comments. I just want to be mindful of the public process that we have here in terms of receiving comments and being able to be responsive to them. I'm always happy to engage on subjects of policy and procedure with folks and get the right people in the room to continue discussing. But just being mindful of the December 15th deadline to get formal comments in so that we can be responsive for the annual plan process. However, even if the conversation continues, I mean this kind of document a living thing and can always be revised as necessary. So happy to continue the conversation, but just want to make sure that the formal or whatever thoughts or considerations we should have to consider for the annual plan, just get in there and we have a chance to be responsive.

Comment: Okay. So I think we totally agree with the idea about prioritizing the various emergency transfers, both reasonable accommodation related and domestic violence



related. And it is really difficult that you have over 500 emergency cases that are backlogged that really cry out for attention. And it's great that HUD has finally said, okay, you can start reaching those cases instead of always having to wait and have them be after new admissions. The point that a resident leader made this morning at the public hearing was right on about that point. That being said, we also agree totally with what DLC said, that it's very complicated and we think that there's going to be the need to work through this over a number of months and have some people in the room that help BHA watch this. It may very well be as BHA has done in the past, invite some additional advocates into the tent who are watching out in this area and seeing if what you've designed is actually working and moving those 500 cases and reaching people appropriately and not then sort of saying, well, because you didn't fit within this dire category, then you become nothing which is a concern that we have. And also that the T1 category, which is basically unreviewable discretion, which is probably needed for a certain really dire cases, at least one can justify how they get used in the same way that if you do HUD waivers or things like that, one can follow all that. We have a lot of detailed comments, which we will get you. We are working on it diligently as we speak and we we'll get them to you by the 15th. But I'm thinking that the main thing is just like a GBLS case that against the department of EOHLC around emergency assistance transfers for reasonable accommodation. This is a complex area and it has a lot of moving parts and it requires a bunch of monitoring and some diligence, and it would be good to sort of keep that in mind. And it may be that everything doesn't get worked out perfectly the first time, and so need to retain some flexibility in the documents that you come up with.

Response: Thank you for your comments. We're committed to providing ongoing updates throughout the implementation of the transfer policy changes.

Comment: Just a couple other comments if you don't mind. I know that BHA this year is also having the issue around what's going on with the continuum of care for the city of Boston and the threat to the continuum of care and permanent supportive housing. And a lot of BHAs designated housing plan depended on that interaction between your two programs and where that's up in the air right now. That's a longer conversation that needs to take place between the BHA and the city of Boston about that. We saw that the BHA took away the mitigation vouchers that were part of the DHP, even though the DHP is still in place, which is a question, but we also understand that you don't have the ability to really issue vouchers because of the shortfall situation that you're in. And you've got a lot of other moving parts that you're having to deal with, like the emergency housing voucher program ending and sort of trying to figure out how do we get people transitioned into that but also spend it down. And so we need to apply some discretion on that. So we understand there are a lot of moving parts and it's very complex policy-wise for the city and the BHA to thread the needle in these torturous times, but this is a longer conversation that needs to take place. I know that we have comments about your residual tenancy policy, about your SPAR policy.

Response: The HUD Continuum of Care grant status is unclear. The BHA acknowledges that the current Designated Housing Plan extends through March 2027 and recognizes the importance of advance planning for any future revisions.

Comment: Really glad to see many of the things that are in the progress report, really good progress around turning around work orders, around vacancies and so forth. I know staff also has highlighted that in reports that have gone to the monitoring committee. At the same time, there are some issues around some mixed finance projects and how their performance has been. And I know BHA is also as part of its customer service review, looking at many of those mixed finance sites and figuring out how are we doing on reasonable accommodation, how are we doing on civil rights delivery? Are they living up to the same promises that we have for the authority as a whole? And here again, as BHA does those assessments, it will be good to bring residents into the tent. There has been a mixed finance residents group in the past, which has been a good forum for bringing together resident leaders and the BHA and those mixed finance partners around what are we all doing together? How are we doing on performance? How can we do better? And I know that there are a number of resident leaders who have called for those meetings to get reconvened. So I know I've got limited time. And now will stop there and get you a lot more in writing before the deadline. But I appreciate the opportunity to speak tonight and I want to thank all the people who turned out tonight. That's been really good, and I'm glad you were able to fix your language access problem.

Response: Thank you for your comments. Always appreciate it and I look forward to receiving those in writing and responding in full.

Comment: So on the annual plan, I'm actually on the annual plan this time. So for Commonwealth, it talks about under the HVAC electric plumbing, I believe there's an explanation that says it includes heating cooling and DHW. What is the DHW? What's that all about? What's that abbreviation? And one of the residents asked me, she posted this question to me, I've been living in here for 40 years and they won't paint my apartment. I said, well, I don't know where that falls on the annual plan, but I can certainly ask, is that something that's a part of anything in this annual plan?

Response: I can tell you that DHW stands for domestic Hot Water. I don't have it in front of me, the specific section, but I assume that there are some projects going on over at Commonwealth that affect the heat and hot water in the future. And so that's what it's contemplating.

Comment: That's right. Her thing was she's elderly. I think she's 91. Some residents, I guess all of Commonwealth is at 72 degrees. Some residents can regulate that, some can't. As you know, elderly people get cold easily. How do they regulate that when it is stuck at 72?

Response: Some of the heating systems, the whole building is at a particular temperature. Sometimes folks crack a window or potentially a space heater could work

in certain areas as long as it's being used in a safe way. With respect to the painting question, we typically don't paint apartments until people move out of the apartments. That's the BHA's practice. But there's maybe some certain circumstances that would require us to paint after an apartment's lived in for many, many years. BHA also has a past practice of providing paint to residents that request it. I could look at that offline if you'd like me to.

Comment: She wanted to ask about the tenant stabilization funding in case people have any limitations in using Rental Assistance to Families in Transition (RAFT). Do you have the information for that?

Response: It would be through contacting the Mayor's Office of Housing Stability. Link added to chat.

Comment: Yeah, so my question is, when I first got my Section eight voucher, it was for 2,400 for four bedroom apartment for me and my kids. So does that ever go up now that rent and stuff is changing?

Response: Yes, the voucher can go up.

Comment: Move from where I was. Do I still have to look for apartment that is \$2,400 or I, does it go up?

Response: Well, it's a complicated answer, but if you go onto our website, there's a chart, a payment standard chart, and there's actually, if you have a four bedroom voucher, the subsidy or what we call the payment standard, it varies in each zip code for a four bedroom apartment. Okay. It's intended to try to meet the market in each zip code that you could live in where the BHA administer vouchers. It's likely that since you moved in that it's changed. I don't know how long you've been in your apartment. It changes every year, usually around January it changes, and in the past several, many years, it typically has gone up.

Comment: I've been here seven years.

Response: If you go onto the Boston Housing Authorities website you can see the small area fair market rent chart. Link added to chat.

Comment: So how long after, how much time do you have? Let's say I wanted to move, and how much time do I have after I don't renew my lease, obviously. So how much time I have after that and what goes on with BHA in terms of while I'm still here looking for an apartment? What happens then? Do they still keep paying until I leave? How does that go?

Response: Yes, while you are in your existing apartment, the BHA will continue to pay the subsidy there. Once you leave and assuming you're giving appropriate notice to your existing landlord, then we'll switch the payments to the new landlord once you

move there. But while you're in your existing apartment, we continue to send the payments there. Even if you've given a notice and you don't leave for whatever reason, we'll still continue to pay the owner at your current apartment.

Comment: And for my last question, I don't want to stay on section eight forever. I would like to move on and move up. I would love to get a house. I have four kids. I would love to see them in a backyard playing stuff like that. So in terms of that, I do realize whenever we make more money, they take more money from us. So what are the plans for us to put money aside and save? If I want to move and let's say get a house, I plan for three years. How can I make more money and set aside money to move into my new home? If every time money goes up in my pocket, they take more for me to contribute to rent. So how would I ever leave if something has to be done with that?

Response: Yes, understood. That's a very difficult problem. I think that a lot of people who are on subsidized programs are dealing with trying to, how to figure out, if I make more money, they take more money. One potential solution is the Family Self Sufficiency program, which is really a savings program that, as you make more money, your rent share increases. What the FSS program is, it recognizes that, but it also takes the difference in between what the subsidy payment was before. It takes the difference and it puts it away in a savings account for you. So if you participated in that program, it may be a value of you, especially if you have increases in earned income. It's something to look into. And it's also something that you can time correctly if you make sure you enroll before you start having increases in earned income or before you take a new job, it's really important that you enroll at that time. I just put the link in the chat for you.

Comment; Okay. She's saying that, sorry she was late. She's not understanding why there's a December 15th. What are you referring to when you say that there's a deadline of December 15th to submit comments?

Response: Yes, so there's a process, and the annual plan process requires that the BHA have a public comment period. We have this annual plan document, and under the law, we must have a 45 day public comment period. That public comment period started on November 1st. It ends on December 15th, and after December 15th, we have some time to consider all the comments that we received, perhaps make changes to the annual plan document before we submit it to HUD. When we do submit it to HUD, we submit all the responses to the public comments that we received in between November 1st and the December 15th date.

Comment: Yes. Hi. Good evening everyone. I live in mixed finance. I'm, we development, and everyone got the understanding that BHA owns the land and the company, Trinity Financial owns the buildings. We started a group, the mixed finance group, and pre COVID, it met for a while and for some reason it hasn't come back. And I think that it needs to come back. Just like with Section eight, I feel like Section eight is a little bit under service because it's so scattered all over that people don't get all the information like they should and come together to meet as a group. But mixed finance

had a group and it hasn't been happening. And there's a lot of stuff that's going on. Some people are actually saying they wish they were still in Boston housing. There's a lot of retaliation and mixed finance and those developments, there's a lot of harassment. What could we do about that? We are all paying our rents. And management is sending letters to residents saying that they owe an X amount of money or eviction letters due to nonpayment. When the tenants have their documentation, have the receipts to show that they did pay the money. And one of the questions that have been asked, if the manager does the notice to quit, would it go on their record, even though they already paid their rent? And the management is the one that recalculated, that calculated the balance wrongly. Would that affect them if it goes into court? So that's my question on that.

Response: It sounds like you have a number of different issues with the owner of the property. We have your contact information. I think maybe we could be helpful by having an offline conversation.

Comment: Yes. You all do have my information. Staff have my email, but we really need to have a meeting. I had already planned to do that because people who speak Spanish and English and Somali is coming to me and also to my mom and her development because they know me as well, and they're trying to tell me all these different things, and they show me the paper, they're crying and I can't help them. The English speaking people, I can say, okay, bring all of this thing. But the other people is like, I'm tired, I'm tired, I'm tired. And they're moving out. It is harassment and BHA needs to step in and help us.

Response: All right. We should try to talk about this offline. It goes to some of the comments that we heard before about possibly having some participation in the RAB or otherwise from mixed finance groups, or trying to get more feedback from folks that are in your particular situation. Thank you.

Comment: Yes. We need to have the mixed finance groups start again, so if you can help us look into that so we can start meeting up again quarterly for 2026. That'll be great. Thank you.

Response: Okay. Thank you.

Comment: There were two people that had an interest in the RAB. Could you ask them to contact you on how to, or should, is there a link that they can, can someone put the link in the chat?

Response: I did put a link into the chat about the resident advisory board. Staff have also added their email to the chat so interested residents can contact them. But in addition, I would just say, if there's anybody who's on the call who's interested in the resident advisory board, you can get in touch with me and I'll refer you either to the chairperson of the RAB or to the BHA liaison who can follow up with you and give you more information.

I just want to go ahead and thank everybody for attending this evening's annual plan meeting. I really appreciate everybody's attendance. I appreciate everybody's comments. And if I wasn't able to respond to your comments in full this evening, the BHA is going to again respond to all the comments that we heard tonight in writing. The meeting this evening was recorded, so we're going to go back and transcribe all of the discussion and make sure that we're answering all the questions in full. And again, when we go to submit these annual plans to both the federal to HUD and to EOHLC with the submission, we'll be providing written answers to all of the comments. We appreciate everybody's participation. This is an important part of how the BHA thinks about its policies and procedures, and we appreciate your feedback and look forward to seeing you all again in the near future. With that being said, have a good night everybody.

#### Comment: Some Themes/Global Comments

A number of themes arose from comments that BHA received during its public hearings on December 8. Residents support BHA's efforts to address critical transfer needs expeditiously, and that existing residents' needs should not come second. But, as discussed further below, the system needs to deliver and not just be a daunting maze that ends up frustrating those it is intended to help – and BHA should welcome others in the tent to help it evaluate and tweak its efforts.

Response: Thank you for your comments. We have begun a comprehensive review of approved transfers. To keep information current and accurate, we are creating a periodic update notification to be sent to all approved transfers to confirm that their information has not changed and remains accurate. We will collaborate with all families who may face barriers to ensure they are given equal opportunity and that each transfer applicants receives the appropriate housing they need.

Comment: There are concerns about safety at a number of BHA sites, and while new technology for entryways and making sure cameras work can help, knowing there is an effective human backstop is also key.

Response: The BHA wants our residents to be safe and secure in BHA developments. BHA is doing quite a bit of investment right now into safety systems at the buildings. We're working on door entry systems and door alarms to make sure that the doors are not propped open, but also that the people who are entering the building are only BHA residents and their authorized guests. We're also doing some work to install more cameras at the BHA developments in addition to fixing those cameras that may be offline. We've recently entered into a relationship with a company that helps us fix our cameras. We've also done training with our internal electricians to be able to wire new cameras and bring cameras back online. We are also working on centralizing that network, making sure that the Boston Housing Authority police have access to the footage when needed to help us with enforcement and also to make sure the buildings are safe and secure.

Comment: Mixed Finance Redevelopment, by providing additional revenue through subsidy conversion and capital upgrades, is one of the BHA's chief measures to ensure that BHA can provide stable, quality housing into the future and not have its stock erode. The BHA and the City have made robust commitments to preserve and expand the supply of deeply affordable (and green) housing. But BHA needs to ensure that Mixed Finance partners continue to live up to their commitments for resident protection and engagement. BHA should reconvene the Mixed Finance Residents Group to provide a forum in which residents share their experiences and aspirations. Resident leaders, BHA staff, and Mixed Finance Partners can collectively evaluate how things are going. BHA should be clear with Mixed Finance Partners about its expectations regarding compliance with the Principles of Redevelopment articulated by BHA staff and Mayor Wu in the fall of 2022, and should monitor to ensure that resident protections - including but not limited to those set forth in the Principles - are being provided.

Response: Thank you for the comment. BHA staff have worked with mixed finance partners and residents in the past and this was a helpful model to discuss issues and improve communications and consistency. BHA staff look forward to convening a mixed finance meeting in 2026.

Comment: Leased Housing participants are feeling frustrated by out of control rent increases and by less perceived benefit from the BHA's programs. This is particularly true at a time when there is a lot of uncertainty (such as the recent notice to landlords about delayed payment pending receipt of federal shortfall funds). BHA has one of the nation's largest and most robust Family Self-Sufficiency (FSS) programs. BHA and the City have teamed up so more BHA participants have been able to take advantage of first-time homebuyer programs. However, BHA should explore additional measures. For example, Northeastern University committed a number of years ago to provide scholarships for BHA public housing residents. But these are not extended to Leased Housing participants, and they should be – particularly as some of the sites that prompted Northeastern to do this (like Mission Main) have gone through subsidy conversion and are no longer public housing. Incentives for voluntary rent stabilization, such as those included in the draft Section 8 Administrative Plan, may also help avoid termination for insufficient funding as well as resident displacement due to rent hikes. Rental market inflation decreases how far BHA Leased Housing resources can stretch to serve needy families. BHA has an interest in reining in these costs while remaining responsive to legitimate owner requests.

Response: Thanks for the comments. BHA staff are engaging with Northeastern University regarding inclusion of leased housing participants.

Comment: GBLS has also seen an increased volume of requests for assistance from BHA Leased Housing participants who have lost or are in danger of losing their subsidies due to recertification issues. This is particularly a concern as more public housing sites convert to Section 8, and there is no longer on-site recertification. In place of human interaction, there is greater reliance on tenants quickly responding to form notices and using technologies that may not be available or familiar to them. Some

tenants have reported that emails to their leasing officers may not have been properly received. We've also heard about leasing officers not being responsive to requests for interim adjustments where there are changes in family circumstances, and families not knowing where to turn due to staff turnover. We've gotten a number of reports that families did not receive recertification letters or even the proposed termination notice. Often when families realize they need help, they are told it is too late to appeal. These problems are not unique to BHA, but BHA should be a leader in addressing them. It is worth concerted discussion about mechanisms to improve this and avoid terminations that could be readily prevented with some additional safeguards.

Response: Thank you for sharing your concerns. We are in the business of housing families and maintaining tenancy, and we understand the impact that delays can have. Recertification is an annual responsibility for families, and timely communication is essential. We encourage families who have not received confirmation that their annual recertification has been processed to please contact BHA staff immediately so we can assist you. Customer service is important to us, and we are committed to working with any participant who complies within a reasonable timeframe. We also recognize that delays in mail can occur, and we are reviewing our processes to improve communication and reduce delays.

Comment: To HUD, I am writing to file a formal complaint reporting discriminatory practices described below: discriminates against tenants who do not drive, tenants without young children, and Section 8 voucher holders, and it denies equal access to benefits and participation available to other tenants.

Summary of alleged discriminatory practices:

Tenants who rely on public transportation to attend certain important meetings/conferences without provision for meals or other reasonable accommodations (for example: explicit rule or statement that tenants may not eat until they arrive at a conference). This policy places an undue burden on tenants who must travel by bus or other public transit and disproportionately affects non-driving tenants and those with lower incomes.

Moving fee/benefit disparities: Other tenants (including those with young children or certain classifications) receive moving fee assistance while tenants without young children, tenants who do not drive, and Section 8 voucher holders are denied the same moving assistance. This has the effect of treating similarly situated tenants differently based on family status and tenancy type.

Unequal compensation for tenant participation: Public housing tenants who attend tenant organizations or boards receive payment or stipends for participation, while Section 8 tenants are not offered comparable compensation for participating in all the same organizations or comparable activities. This unequal treatment discourages and excludes Section 8 tenants from meaningful participation.



The same small group of tenants serve on tenant run groups and committees year after year especially tenant organizations. Those boards and programs prioritize issues related to families with young children, while issues important to seniors, non-driving tenants, single adults, receive little attention or support. This has produced an environment where access to resources and decision-making is not equitably distributed. With maybe the exception of RAB because of Covid.

Entrenched leadership is when the same leaders or leadership style become firmly established and resistant to change, often blocking new ideas, limiting diversity of voices, and preserving the status quo.

Why these practices are discriminatory: The disparate treatment based on family status (preference or benefits for tenants with young children) and tenancy classification (public housing tenants receiving benefits that Section 8 tenants do not) has the effect of denying equal opportunity and access to benefits and services to protected or otherwise similarly situated groups.

Policies that fail to account for transportation limitations or effectively penalize tenants who rely on public transit create a disparate impact on tenants who do not drive, who are older, who are disabled, or who cannot afford private transportation.

The pattern of repeated appointments of the same individuals to tenant boards, combined with preferential programming for one tenant group, results in exclusionary decision-making and a lack of meaningful access for other tenant groups.

An investigation into the practices described above and a determination whether they violate HUD's fair housing and equal opportunity requirements.

A directive that all tenants be treated equally with regard to moving assistance, compensation for tenant organization participation, and other tenant benefits irrespective of tenancy type or family status.

Reasonable accommodations and policies that account for tenants who rely on public transportation (for example: providing meals or meal stipends tied to travel time; scheduling that reasonably accommodates transit schedules).

A Brookline Professor was allowed to move back to Brookline in a lower cost apartment  
Directive: Equal Priority for Returning Residents to Reoccupy reduced cost housing in Brookline

Purpose: To establish a clear, nondiscriminatory policy ensuring that returning residents seeking to move back to Brookline receive priority equal to other Brookline residents, including placement into lower-cost units when appropriate, and to ensure Section 8 mobile voucher holders are treated equitably in all re housing and mobility processes.

Returning resident — a former Brookline resident who previously lived in Brookline housing and seeks to reestablish residency.

Section 8 mobile voucher holder — a household holding a tenant based Housing Choice Voucher that is portable or seeking portability to Brookline.

Lower cost apartment — any unit with rent or tenant share that is below the household's previous rent level or below prevailing market rates for comparable units in Brookline.

Policy Statement: All returning residents who meet program eligibility requirements shall be afforded priority equal to other Brookline residents for placement into available units, including lower cost apartments, without discrimination. Section 8 mobile voucher holders shall be eligible for the same priority and placement opportunities as other residents.

Procedures Eligibility and Application: Eligibility is determined by existing HUD and local program rules (income, voucher status, criminal history screening where applicable).

Returning residents who meet eligibility shall be placed on the same priority list as Brookline residents seeking housing. Local housing authorities shall provide reasonable assistance to applicants who rely on public transportation or have other access barriers.

Priority and Unit Offer: When a returning resident accepts a lower cost apartment, the housing authority shall document the offer and acceptance and ensure the unit meets habitability and accessibility standards.

Section 8 Mobility and Portability: Section 8 mobile voucher holders seeking to return to Brookline shall be processed under the same priority rules. Portability requests shall be handled promptly and in accordance with HUD regs.

Reasonable Accommodations and Supports: Housing authorities must provide reasonable accommodations and practical supports for applicants who rely on public transportation, including flexible appointment scheduling, remote application options, and meal or travel stipends when required by program rules or local practice to enable meaningful participation.

Get COC out of my home simplify by building more comfortable homes with utilities for people who do not need or ever want these services. Oh wait the most import thing comfortable without utilities too HUD forgot to appropriate money for tenant utilities only the second biggest thing next to having a place to live. I do not even get moving fees and I do not drive not enjoyable to move myself and not sure if I can at my age, apartment without a bed that's enjoyable isn't it?

Data and privacy: HMIS improves coordination but has confidentiality and consent issues. I was there with an HMIS event employee it ended up being a play with her the star a former drug addict wrote about her home basing (cooking drugs) that other low-income tenants were selected to play a part in this play about her former life. I Object to HMIS having any personal data of mine. Still did not get reimbursed for my expenses but I enjoyed dropping in on the other employee seminars.

Summary discriminatory practices: Tenants who travel by public transportation are effectively penalized by policies that fail to accommodate long transit times and prohibit eating until arrival at conferences or meetings, creating an undue burden on non-driving tenants.

Moving fee assistance or related moving benefits are provided to some tenants (notably those with young children) but denied to tenants without young children and to tenants who do not drive.

Public housing tenants receive stipends or payments for participating in tenant organizations; Section 8 tenants are not offered comparable compensation for attending the same meetings or serving on the same committees.

Why these practices are discriminatory: Differential treatment based on family status and tenancy type results in unequal access to benefits and participation opportunities for similarly situated tenants.

Policies that ignore the needs of tenants who depend on public transit have a disparate impact on non-driving, low-income, older, or disabled tenants.

Remedies requested: A HUD investigation into whether the practices described violate federal equal opportunity laws.

An order that moving assistance, participation stipends, and similar tenant benefits be made available on an equitable basis regardless of tenancy type or family status.

Guidance or a directive requiring reasonable accommodations and supports for tenants who rely on public transportation, such as providing meals or meal stipends tied to travel times or scheduling that accommodates transit.

Recommendations procedures to prevent entrenched leadership style or leadership many of the tenant organizations have the same tenant leaders year after year.

What kinds of people live in Mental Health Facility tenants residential facilities or supportive housing. group: adults with serious mental illness, drug addicts, veterans, youth transitioning from other systems, coming from jail, and formerly homeless individuals who need ongoing supports.

Those who need specialized supportive housing: individuals with serious mental illness who require regular clinical support; people with drug addicts; those leaving hospitals, jails, or homelessness; older adults with severe cognitive or psychiatric needs; and veterans with service connected conditions.

What services on site case management, medication management, crisis response, and connections to community health providers. Typical resident groups and why they live

there. Adults with serious mental illness such as schizophrenia, bipolar disorder, or major depressive disorder who need stable housing clinical supports to function in daily life. People with drug addiction co-occurring substance use disorders who benefit from integrated treatment and housing stability to reduce relapse and hospitalizations. Formerly homeless individuals.

Importance of Separate Housing: Keeping mental health facility residents and low-income tenants in separate housing ensures that people with significant clinical needs receive specialized, on site supports and staffing tailored to their care, while low income households live in stable, predictable environments suited to their needs and expectations; this separation helps protect safety, preserve tenancy stability, with allowing people to apply for free house cleaning help if they need it. Allowing COC continuum of care is to destroy reduced cost housing, more landlord complaints and horrible reputation for section 8 Mobile when reputation is the only thing that gave us housing. Aka section 8 is almost dead in my greater Metro area. Mixed income housing is not a right but an earned privilege.

Every single place in the Greater Metro area that has Public Housing or Mixed income Housing has either an active park/field or playground under my windows! Put the base the screams the screams, yelling and crying under your window! There are no different types of housing for different types of people only over development. One place is going to be built here is my dream come true comfortable with utilities here is my hope. I do not drive and want to go back across the street. I have tried for 10 years thus far. Why is it important I feel more and more disconnected every year even though I live across the street the walk also gets longer and longer.

Response: Thank you for your comments. BHA does not have a rule that tenants may not eat until they arrive at a conference. All transfers are at the resident's expense, except those required by capital improvement/redevelopment programs. Refer to the specific relocation plans for each development. Unequal compensation for tenant participation from different programs is an issue worthy of resident policy advocacy. In BHA staff's experience while public housing resident participation policy permits board member stipends few actually do. Resident associations hold regular elections and the voters are residents.

Comment: RECOMMENDATIONS ON IMPROVING MECHANISMS FOR PUBLIC AND RESIDENT PARTICIPATION IN THE ANNUAL PLAN PROCESS: The following suggestions are not commentary on the substance of the Annual Plans, but proposals for how BHA might facilitate access to materials and encourage more meaningful participation in the public review process. We acknowledge, at the outset, the clear efforts by BHA staff to ensure full access to Plan materials and provide timely notice of public hearings and comment periods to residents, the RAB, and other stakeholders in the community. Recommendations here are meant to enhance rather than criticize these efforts.

Many if not most members of the public with an interest in providing commentary are likely to access the materials online through BHA's website. Given the volume of material contained in the state and federal Annual Plans, the appearance and organization of the relevant webpages is critical for ensuring meaningful access.

Response: Thank you for your comment. BHA staff appreciate the engagement of residents and advocates in the plan process.

Comment: The main Annual Plan webpage (linked here) is visually confusing and should be revised. Spacing, font sizes, and text effects such as bolding and underlining are inconsistent. Font sizes and text effects should be streamlined throughout. Underlining should be used sparingly to indicate links, rather than for emphasis. Users should be able to click immediately on the document title listed, rather than having to read through extraneous text such as "To see the [xxx], click here". Explanatory text should be visually distinguishable from document titles.

This webpage overall simply displays too much material at once without allowing the user to minimize irrelevant material. Adding dropdown functions (permitting the user to click on a heading to show or hide text beneath) could help.

Information about current and upcoming comment periods and scheduled hearings should be displayed prominently near the top of the webpage.

BHA should reorganize this webpage so that the user need not scroll through excessive text to find materials. The page should include a main menu that clearly displays headings for each major element: currently effective plan(s), pending draft plan(s), past/archived plans, upcoming hearing/comment deadlines, as well as some brief introductory information about each element to guide the user to their desired location.

Response: BHA staff from Operations and Communications will carefully review these comments and plan to make changes to the portion of the website dedicated to annual plans prior to the next annual plan cycle. Staff have begun work and agree with the commenter that the plan information can be better organized and more consistent in terms of presentation.

Comment: The main menu at the top of the webpage contains four bullets (see bracketed text that follows for specific comments on each):

The Annual Plan [this appears to be a hyperlink which simply refreshes the existing page, and is unnecessary]

Response: See above response.

Comment: Federal Annual Plan 2020 and Five Year Plan (2020-2024) approved documents [links to a separate page with the documents indicated, but those

documents are neither currently effective nor currently proposed, so unlikely to be relevant for the average webpage visitor]

Response: BHA provides access to current approved plans, proposed plans, as well as an archive of previous plans on the website. Staff will work to make sure links are working and improve organization so users easily find the information they are looking for.

Comment: Federal Annual Plan 2024 approved and draft 2025 [the bolded text is a broken link that presumably once took the user to the document indicated, but again, the FY24 plan is neither currently effective nor currently proposed. The remainder of the text does not link to anything, and its inclusion here could mislead users by suggesting the 2025 draft was not approved]

Response: See above response.

Comment: The first main heading below the main menu (The Federal Five-Year and Annual Plan and Amendments and State Annual Plan) includes general information about annual plans, and provides helpful context. However:

The second paragraph is simply an explanation of what documents are available further down on the page, including the currently effective and proposed federal plans; there should be anchor links included with these references.

The third paragraph both provides helpful background information on the state Plan and provides the only link on the page to access currently effective and pending state Plan materials, as well as archived materials. Consolidating this information on a separate webpage is helpful; however, the link is provided in a non-prominent location in small body text near the end of the paragraph and is thus too easily overlooked.

Response: Thank you for the comments. Staff are working to better organize the plan section of the website. Staff increased the font size of the state plan link.

Comment: The following two main headings describe the currently effective 5-year and annual plans.

The first (Current Approved: HUD Federal Five-Year Plan documents) is followed by some brief text including a hyperlink to a separate page containing those documents. A separate webpage can be a user-friendly way to direct the reader to this material, but the heading itself should also be a clickable link.

The next heading (Current Approved: HUD Federal Annual Plan document) precedes introductory text which itself includes a hyperlink to a 2024 hearing notice and then is followed by 13 bullets, each linking to a different element of the currently effective Plan.

These too should be consolidated on a different webpage or presented via a drop-down function to avoid visual overload.

For both the 5-year Plan and the federal Annual Plan, we recommend consolidating all sub-elements into a single linked PDF, similar to the one available on the State plan webpage.

Response: Thank you for these comments. Staff will take all these into account as it works to improve the annual plan section of the website.

Comment: The subsequent two main headings are for currently pending materials: the DRAFT Proposed HUD Annual Plan 2025 Amendment 1, and DRAFT Proposed HUD Federal FY 2026 Annual Plan (covers April 1, 2026 - March 31, 2027).

The text used for these headings is smaller, not bolded, and differently colored than the previous main headings, making them appear to be subsections of the last main heading.

Again, sub-elements in these sections (8 in the first, 13 in the second) should be consolidated on separate dedicated webpages or presented via a drop-down function.

Response: See above response.

Comment: The remaining subheadings on the page -- HUD Federal Plan Archives (followed by text linking to archived plan documents and a "The Federal Plan Process" subheading), HUD Plan Public Notice (which should include information about upcoming or current notice periods), HUD Plan Public Hearing (which should include information about upcoming scheduled hearings), and HUD Annual Plan Amendments -- are informative and less visually confusing than the sections above. However, they are likely to be overlooked due to their placement so far down after the preceding materials.

Response: Thank you for the comments.

Comment: The BHA's translation of the Notices of Public Hearing into multiple languages is appreciated. However, we recommend also providing translated copies of the "Detailed Instructions for Remote Access" document apparently distributed along with the notices. Translations of the Notice should include instructions on how to request interpretation at the hearings. Additionally, all notices should include updated date information (this year's translated notices are marked "10/2024" in the page footer).

Response: Thank you for the comments. The plan hearing notice has the language access box with a dozen languages saying this is an important document. If you require interpretation, please call the number below. Staff will take the comments under advisement. The final translated notice footer date was updated to 10/2025.

Comment: BHA's provision (on the main webpage and through dissemination to RAB members) of summaries outlining proposed policy changes to the ACOP and

Administrative Plan has been an effective way to communicate important information, particularly given the overall volume of Plan materials. We recommend making these summaries available in other languages most commonly spoken by residents.

Response: Thank you for the comments. Staff will take the comment under advisement.

Comment: We commend BHA's efforts to provide language access during the public hearings on the Annual Plan. However, we note that there were several issues with language access during the Zoom hearing on December 8, 2025, and we encourage BHA to address these concerns for future public hearings. First, we recommend that, prior to a public hearing utilizing Zoom's interpretation channels, BHA do a dry run to ensure that the interpretation channels are working correctly before the hearing begins. Second, we recommend that BHA develop a protocol to deliver clear instructions early in the hearing (orally in English and in each language for which interpretation is available) for all users of the interpretation channels so that they know how they can make a comment or ask a question. Third, we recommend that BHA strive to ensure that the Haitian Creole channel is appropriately labeled, as other public entities have been able to do. Fourth, we encourage BHA to activate all language channels for the entirety of the hearing, even if no users of a particular channel are present at the very beginning of the hearing. Finally, we recommend that BHA clarify whether it is providing "Chinese" interpretation in Mandarin or Cantonese (or, optimally, that it provide both).

Response: Thank you for your comment. BHA will look into these suggestions.

### **Public Safety:**

Comment: S. Safety & Crime Prevention (pp. 51-63)

As this section indicates, safety and crime prevention are critical concerns across BHA's portfolio, with an extensive list of tools employed to address the maximum need for measures to ensure the safety of residents. Additionally, the shrinking portfolio under direct BHA management increasingly constrains residents' ability to get a VAWA transfer. Despite these realities, BHA has not revised its VAWA policy since 2011. BHA should allow VAWA transfers freely between its public housing and PBV programs, and should review and update its VAWA Policy (this need not wait for the Annual Plan and could be done as a mid-year amendment). It would be helpful to engage with advocates to get outside feedback. This may intersect with getting feedback on how the revisions to the Transfer Policy address the needs of survivor of domestic violence, dating violence, stalking, and sexual assault.



As noted in the global comments above, BHA should review the City's Elderly Security Ordinance and whether assessments are up to date for its portfolio, considering both physical security measures and use of personnel or police.

Response: BHA wants our residents to be safe and secure in BHA developments and is continuing to make investments in BHA police, door entry systems, and cameras. The BHA reviews its VAWA policy from time to time. Staff will take the comment under advisement.

### **Real Estate Development**

Comment: S. Mixed Finance Modernization (pp. 69-70)

On (ii), there is an Old Colony update. Is it expected that Phase VI will be completed by the time the PHA Plan is submitted to HUD in early January? If so, that portion should be revised.

On (iv), Amory Street, it may be helpful to add an anticipated completion date for the project that broke ground, and give projected start and completion dates for the balance of the site.

For Bunte and Ausonia (vi & vii), please add projected start and completion dates for renovations.

For Eva White (ix), any projected construction completion date?

For Patricia White (xv), please add anticipated start & completion dates for renovations.

For General Warren (xvi), very glad to hear about the CHAP award on October 1, 2025 (right before the federal government shut-down). Will there be any further resident meetings to go through RAD specifics? GBLS is willing to work with them (and resident councils at any other redeveloping sites) on any bylaw revisions needed to switch to Mixed Finance.

Thank you for adding the Charlestown update (xvii) where GBLS has helped with the Tri-Party partnership between BHA, the Developers, and the resident council Charlestown Resident Alliance (CRA) for quite a few years.

Information is added on Mary Ellen McCormack (xviii) construction start—can any anticipated construction completion date information be added?

For Hailey, there is both the redevelopment with Centre Street Partners (CSP) (xix) and the BHA modernization (xx). The CSP piece should be revised to reflect that the fall 2025 date is construction completion & lease up for Phase I. More detail should be provided for the BHA modernization, including projected dates of construction start & completion for the first phase (or any subsidy conversion, if that may happen without renovations for the Plant Court portion of the site).

Response: We will add the following additional detail about completion dates:

- Old Colony Phase Six completed construction in December 2025; lease-up will begin in early 2026.
- 127 Amory Street (which began construction in March 2025) will reach completion in early 2027.
- Doris Bunte construction is anticipated to start in 2027 (subject to final funding awards)
- Ausonia construction is anticipated to start in 2028 (subject to funding awards).
- Eva White construction will complete in mid-2026.
- At Patricia White, a first phase of limited renovations (e.g., roof repairs) will complete by mid-2026 with more extensive work to follow in subsequent years (pursuant to further community planning).
- At General Warren, design investigations are underway as of December 2025; BHA will continue to host regular resident meetings including one scheduled for January 2026, and on an ongoing basis thereafter.
- At Mary Ellen McCormack, Building A (which began construction in March 2025) will reach completion by summer 2027.
- At Mildred C. Hailey Apartments, with respect to the new construction (redevelopment) work underway by Centre Street Partners: the first two new buildings reached completion in December 2025 and will begin lease-up in 2026.
- At Mildred C. Hailey Apartments, with respect to the comprehensive modernization underway by BHA: A first phase comprising five buildings is underway. The first building was completed in September 2025, and a second building will be completed in February 2026; the three following buildings will be completed at approximately six-month intervals with the entire first phase ending by mid-2027.
- Also at Mildred C. Hailey, accessibility upgrades will be made at the four buildings at Plant Court in 2026 with the aim of completing a subsidy conversion to Section 8 subsidy within the coming year.

Comment: S. Demolition and/or Disposition (pp. 71-81).

For the Anne M. Lynch Homes at Old Colony Phase Three (p. 71), it's indicated that construction will be complete in 2025 (and other sources say January 2026). If this is done before the HUD submission deadline, it should be updated.

For Whittier Street (pp. 71-72), there was an anticipated construction completion date in October 2025. Has this occurred, and can this now be listed as an actual outcome? If not, but the completion occurs prior to HUD submission in January 2026, the revision should be included.

For Charlestown (p. 72), no comment needed.

For the first Hailey item (p. 74), which covers the redevelopment of 1/3 of the site by Centre Street Partners (CSP), this should be revised to reflect actual completion of Phase I buildings by the time this is sent to HUD in January 2026.

For the second Hailey item (pp. 74-75) (BHA portion of the site), more detail should be provided here regarding start of rehabilitation work on first building and anticipated completion, as well as any dates for subsidy conversion where rehabilitation may not be necessary (for example Plant Court).

For Patricia White (p. 77), it would be helpful to give more of a description of what's planned.

For St. Botolph (pp. 77-78), language is removed about pursuing a RAD Blend, and language is added about establishing a ground lease in August 2025, starting construction in mid-September 2025, and language was kept about anticipated completion in 2027. There is some concern if residents thought this might be RAD blend at one point (with all of the protections associated with RAD), and then the project ultimately was not done through RAD, whether this means that any resident reassurances/protections would be different. Please clarify. GBLS is happy to work with the resident organization here on any needed revisions to their bylaws to reflect the new Mixed Finance arrangements.

Response: We will add the following additional detail:

- Old Colony Phase Six completed construction in December 2025; lease-up will begin in early 2026.
- Whittier construction completed in October 2025.
- For the Hailey redevelopment underway by Centre Street Partners: the first two new buildings reached completion in December 2025 and will begin lease-up in 2026.
- For the Hailey modernization underway by BHA: The first building was completed in September 2025, and a second building will be completed in February 2026; the three following buildings will be completed at approximately six-month intervals with the entire first phase ending by mid-2027. Also accessibility upgrades will be made at the four buildings at Plant Court in 2026 with the aim of completing a subsidy conversion to Section 8 subsidy within the coming year.
- At Patricia White, a first phase of limited renovations (e.g., roof repairs) will complete by mid-2026 with more extensive work to follow in subsequent years. The scope of work will be finalized only with community input.

- At St. Botolph, the project is proceeding just as described without a RAD component;

In response to the additional comments about St. Botolph: residents should rest assured that BHA retains ownership (through a fully controlled affiliated entity) and property management, and BHA has committed to assuring protections similar to RAD. BHA appreciates GBLS's willingness to work with the resident organization at St. Botolph

### **Real Estate Development RAD Attachment**

Comment: RAD Addendum to Federal PHA Plan

Pp. 1-2, carryover paragraph, refers to RAD requiring adoption & implementation of certain protections for tenants & applicants for both PBV and PBRA conversions, and BHA's duty with regard to PBV conversions. The HUD Notice references here should be updated, as the last one listed is from 2019, and some of the more recent ones are

clear about how all units (and not merely those funded through RAD) are to be treated in a RAD blend.

Response: The Boston Housing Authority (BHA) acknowledges the comment. While the RAD Addendum explicitly references “any successor notices,” we recognize the value of appending specific notices in their entirety. In addition to the two documents previously appended, we will append RAD Supplemental Notice 4C (Notice H 2025-01 / Notice PIH 2025-03) inclusion of which will reflect the broader application of RAD requirements and will ensure consistency with the current standards for all units affected by RAD conversion, not limited to those funded through RAD.

Comment: p.4, Ausonia. As noted in the last year’s submission, BHA obtained a Section 18 approval here but has kept open the possibility of a RAD Blend. Tenant/applicant protections are not the same for a pure Section 18 conversion. If BHA ultimately elects to do this purely as Section 18, it should commit to following the requirements of Section 35 of the Mass. Affordable Homes Act of 2024 and BHA's own Principles of Redevelopment to ensure that key resident and applicant protections are carried over. These commitments should be reflected in binding and enforceable agreements. (See similar comment above under the Supplement, Demolition/Disposition for St. Botolph.)

Response: The BHA acknowledges this comment and reaffirms its commitment to providing robust tenant and applicant protections in all redevelopment scenarios. If BHA elects to proceed with a pure Section 18 conversion for Ausonia, the BHA will follow the applicable requirements of Section 35 of the Massachusetts Affordable Homes Act of 2024 and its own Principles of Redevelopment to the greatest extent feasible. These commitments will be incorporated into binding and enforceable agreements to ensure that the rights of residents and applicants are fully protected throughout the redevelopment process, whether under Section 18 or a RAD blend.

Comment: p. 10 deletes the *Eva White* RAD/blend conversion which was completed in late 2024. Do items need to remain in the RAD addendum if renovation work is underway and has not yet been completed, as is the case here?

Response: The BHA acknowledges that the RAD/blend conversion for *Eva White* was completed in late 2024 and that renovation work is ongoing. Given the completion of the conversion, it is not necessary to retain this item in the RAD addendum unless there are unresolved elements related to the conversion process. The BHA will review the status of any ongoing renovation work and update the RAD Addendum to accurately reflect the current status of the project.

Comment: p. 12 refers to Mildred C. Hailey Apartments and the BHA administered portion of the site (not the 1/3 of the site being redeveloped by Centre Street Partners). As noted here, BHA obtained Section 18 demo/Dispo approval but has kept open the option to process this through a RAD blend. There is an updated CFP. As with Ausonia, if the ultimate disposition is not through RAD, BHA should enter into binding commitments, following its Principles of Redevelopment and Section 35 of the

Affordable Homes Act, to carry forward key tenant and applicant protections in binding and enforcement commitments consistent with RAD, so that residents are not disadvantaged by the ultimate choice whether to pursue Section 18 or a RAB blend.

Response: The BHA appreciates the comment and confirms that if the ultimate disposition of Mildred C. Hailey Apartments is not processed through RAD, the BHA will enter into binding commitments, consistent with the Principles of Redevelopment and, as applicable, Section 35 of the Affordable Homes Act. These commitments will ensure that tenant and applicant protections are carried over in a manner that is consistent with RAD requirements, thereby safeguarding residents regardless of the chosen disposition method.

Comment: p. 13 covers General Warren. Since a CHAP has been executed here, shouldn't the reference to the possibility of a purely Section 8 conversion be removed?

Response: While BHA does indeed anticipate a RAD conversion pursuant to the CHAP, as explained in the text a final decision may depend on the level of capital needs. BHA does not believe that the existence of the CHAP would preclude a future Section 18 application. However, we agree that a 100% Section 18 approach is likely not needed.

Comment: p. 14 covers the West End Library which is the first of the Restore Rebuild (previously Faircloth) proposals for use of RAD authority. It is unchanged from last year. It does not have a specific number of projected Restore Rebuild units. BHA should review if the note should be updated (for example, the note still refers to Faircloth).

Response: The BHA acknowledges this comment. The reference to "Faircloth" public housing units does indeed make sense in this context, though we acknowledge that an additional reference to "Restore-Rebuild" would be helpful—and indeed we will add the phrase "Restore-Rebuild." The BHA will also review the specifics of the West End Library project and provide updated projections if available prior to submission for the number of units, ensuring that the RAD Addendum accurately reflects the status and details of this Restore Rebuild proposal.

Comment: p. 15 covers Faneuil Gardens, which is the second of the Restore Rebuild proposals. Faneuil Gardens has been a state family public housing development. This is revised to say that there will be 85 Restore Rebuild units, rather than the 32 listed last year. There have been some recent announcements about funding commitments to help support this work. BHA should review if the note should be updated, and should consider a presentation to the RAB and BHA Monitoring Committee on Faneuil redevelopment plans within the coming months.

Response: The BHA acknowledges the revision to the Faneuil Gardens proposal, increasing the number of Restore Rebuild units to 85, and recognizes the recent funding commitments to support this effort. Additionally, the BHA will consider presenting the updated redevelopment plans to the Resident Advisory Board (RAB) and the BHA

Monitoring Committee in the coming months to ensure continued transparency and engagement with stakeholders.

Comment: p. 16 covers Parcel 12-C in Chinatown and is the third of the Restore Rebuild proposals. It is a joint project of the Asian Community Development Corporation and The Community Builders and does not have a specific number of projected Restore Rebuild units. Is this text new? If not, any updates?

Response: The BHA confirms that the text regarding Parcel 12-C in Chinatown is not new and has been included in prior submissions. However, the BHA recognizes that specific projections for the number of Restore Rebuild units have not been finalized. The BHA will review the status of the project and if available by time of plan submission update the RAD Addendum accordingly, providing a more detailed estimate of the number of units and any additional project updates.

Comment: p. 17 covers Allston Senior Housing and is the 4th of the Restore Rebuild proposals. It is a project of Allston-Brighton Community Development Corporation and does not have a specific number of projected Restore Rebuild units. Here, too, the outside reader cannot tell (due to lack of redlining, except in CFP box) if this is new, and if not, any update?

Response: The BHA acknowledges this comment and confirms that the Allston Senior Housing project is not new, as it was included in previous submissions. However, the lack of specific unit projections is noted. The BHA will provide an update on the number of Restore Rebuild units and clarify the status of the project, including any new developments, if available by time of plan submission.

Comment: p. 20 is a deleted proposal for 495 Dorchester Avenue in Dorchester which was to be a joint venture of Core Investments and Dream Development. There is no indication if it was Restore Rebuild or something else. This proposal was not previously listed. BHA should explain why this proposal was deleted.

Response: The BHA acknowledges that the proposal for 495 Dorchester Avenue has been deleted from the RAD Addendum. The project was originally envisioned as a joint venture between Core Investments and Dream Development. However, due to changes in project feasibility, funding, or planning, the proposal has been withdrawn.

Comment: p. 22 refers to 120 George Street (no neighborhood is given and it should be) and is the 8th of the Restore Rebuild proposals. It was a state public housing scattered site unit which is part of an overall disposition and redevelopment plan, and will result in 21 RAD units. The BHA has previously done presentations on its Chapter 705 disposition to the RAB and the Monitoring Committee, but it is probably time to provide an update.

Response: The BHA agrees with the comment regarding the lack of a specified neighborhood for 120 George Street and will update the RAD Addendum to include the

property zip code, which is 02119. Additionally, the BHA recognizes the need for an updated presentation to the RAB and Monitoring Committee on the Chapter 705 disposition and redevelopment plan for 120 George Street. The BHA will schedule a presentation in the coming months and ensure that all stakeholders are kept informed of progress.

Comment: p. 23 is a deleted proposal for Hartwell House, which appears to have been a Section 8 Moderate Rehabilitation (Mod Rehab) or Rent Supplement property that wasn't originally within BHA's portfolio but where BHA was later designated as a subsidy administrator. More detail should be supplied about what this was about, why this was deleted, and what the current status is for this site.

Response: The BHA acknowledges the deletion of the Hartwell House proposal. Hartwell House was originally a Section 8 Moderate Rehabilitation or Rent Supplement property, and while it was not initially part of BHA's portfolio, BHA was later designated as the subsidy administrator. Due to changes in project scope, funding, or planning priorities, the proposal was removed from the RAD Addendum.

Comment: p. 24 is a deleted proposal for Nueva Vida, which appears to have been a BHA Mod Rehab property. Here, as with Hartwell House, it is not clear why this was proposed and why it is now being deleted, and more information should be provided.

Response: The BHA acknowledges the deletion of the Nueva Vida proposal. Nueva Vida was previously a BHA Mod Rehab property, and its inclusion in prior plans was part of an earlier redevelopment vision. However, due to changes in redevelopment priorities and planning, the proposal has been removed.

Comment: p. 25 is a deleted proposal for Bishop Street/Elsie Frank, which appears to have been a BHA Mod Rehab property. Here, as with the prior two items (Hartwell House and Nueva Vida), it is not clear why this was proposed and why it is now being deleted, and more information should be provided.

Response: The BHA acknowledges the deletion of the Bishop Street/Elsie Frank proposal. As with Hartwell House and Nueva Vida, this property was originally part of a broader redevelopment strategy involving BHA's Mod Rehab portfolio. However, after reassessing the project's feasibility and priorities, the proposal was removed.

Comment: p. 26 is a deleted proposal for 123 Crawford, which appears to have been a BHA Mod Rehab property. Here, as with the previous three items (Hartwell House, Nueva Vida, and Bishop Street/Elsie Frank), it is not clear why this was proposed and why it is now being deleted, and more information should be provided.

Response: The BHA acknowledges the deletion of the Bishop Street/Elsie Frank proposal. As with Hartwell House and Nueva Vida, this property was originally part of a broader redevelopment strategy involving BHA's Mod Rehab portfolio. However, after reassessing the project's feasibility and priorities, the proposal was removed.

Comment: p. 27 is a non-deleted proposal for Tuttle House which has been a BHA Mod Rehab property with 26 studio units. (It is listed as the 5th such proposal, but given the deletion of the previous 4 items, should be the 1st.) It would be helpful to get an explanation why BHA is proposing this conversion. (One of the RAB's former chairs lived at this property.)

Response: The BHA acknowledges the comment and agrees that the Tuttle House proposal should be listed as the first, following the deletion of the previous four items. As for the rationale behind proposing the conversion, the BHA recognizes the importance of this property, particularly given its history within the Mod Rehab program. The BHA is proposing this conversion as part of its broader strategy to ensure the long-term sustainability of affordable housing, and this will include preserving the unit count and maintaining the current level of services for residents. The BHA will update the RAD Addendum to reflect the appropriate sequence of proposals.

Comment: p. 28, here in the Appendices, as at the beginning of the Addendum, there is reference to certain RAD guidance, and BHA should review this and update it in case there are any additional items that should be included (for example, see RAD Supplemental Notice 4C, issued 1/16/2025).

Response: BHA acknowledges the comment. While the RAD Addendum explicitly references "any successor notices," we recognize the value of appending specific notices in their entirety. In addition to the two documents previously appended, we will append RAD Supplemental Notice 4C (Notice H 2025-01 / Notice PIH 2025-03) inclusion of which will reflect the broader application of RAD requirements and will ensure consistency with the current standards for all units affected by RAD conversion, not limited to those funded through RAD.