

Comments and Responses to the BHA FY 2021 State Annual Plan.

The following document contains the comments and responses received on the BHA's FY 2021 State 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 Plan was put out for public comment on November 1, 2020 and the comment period closed on December 15, 2020 with a virtual public hearing held on zoom December 7, 2020 at 11 am and another at 6 pm.

The BHA took several steps to notify the public of the FY 2021 State Annual Plan 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, sent a mailing to Leased Housing participants in Boston and nearby towns notifying them of the Public Hearing and the proposed Plan. 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.

Many comments are specific to Plan attachments:

AP: Annual Plan template

CP: Capital Plan

Overview and Certification

Comment: (Ops) This is the first time that BHA has done such a report, which is a new requirement that was added by the State Legislature and DHCD. BHA is using its existing PHA Plan process for its federal programs and its Resident Advisory Board (RAB), which has always been open to state public housing resident participation and currently has several state public housing residents from West Broadway and from Franklin Field Elderly.

Response: Thank you for the comment.

Comment: (Ops & RED) (Section 1) Section 1.1 (p.2 of 4): As noted here, there are 7 BHA state family (Chapter 200, general occupancy) developments (Archdale, Fairmount, Faneuil, Gallivan Boulevard, Orient Heights, South Street, and West Broadway), 3 state elderly/disabled (Chapter 667) developments (two at Franklin Field, and one at Monsignor Powers), and 3 Chapter 705 developments (Bowdoin Street, Harwood St./Winston Rd., and scattered site), as well as 5 elderly units in smaller developments and 52 special occupancy units, for a total of 2,139 units. Should this also include Camden Street, or have all of those Chapter 200 units converted to non-state funding (or are partly accounted for under the MRVP totals, below)?

Response: Camden no longer receives state operating subsidy funding, but it is still part of the state public housing portfolio. (Operating support comes from a combination of federal Section 8 subsidy and state MRVP subsidy.) Camden Street is included in the MRVP totals. BHA will consult with DHCD about how best to capture Camden in the plan and will make updates accordingly.

Comment: (Lsd Hsg) On p. 3, it's noted that BH has 975 Mass. Rental Voucher Program vouchers (MRVP). This portfolio is far smaller than BHA's Section 8 portfolio (roughly 15,000 vouchers) or the MRVP portfolio of Metro Housing Boston (MHB), but it is still an important program/resource. It would be helpful to know how many of these units are tenant-based (mobile vouchers) and how many are project-based. Does BHA have any Alternative Housing Vouchers?

Response: BHA staff will work with DHCD to accurately reflect the number of vouchers in the MRVP program. BHA utilized voucher data in January 2021 shows 666 project-based vouchers and 201 mobile vouchers, of which 26 are AHVP.

Comment: (Legal) Also on p. 3, I believe Kate Bennett's designation is no longer "acting", and it's not clear why her email address is not used. The Board of Commissioners portion is left blank. BHA should state that as a result of the receivership litigation, it was required to have a new form of governance in which the Mayor would be accountable directly for its operations, but that there is a Monitoring Committee with a resident majority that reports to the Mayor.

Response: The template has been updated to remove acting and add Kate Bennett's email. BHA staff are working with DHCD staff to make any needed adaptations to account for BHA's governance.

Policies

Comment: (Legal, Grievance & RED) The list of policies on Section 6.1, pp. 1-2, is not complete nor up to date. For example, on the Grievance Policy, BHA began implementing changes to the Grievance Policy in 2020, partly to incorporate changes that had previously been approved by the RAB, HUD, and DHCD but not yet implemented, and partly to respond to COVID-19. In 2019, BHA also issued a revised Mixed Finance Grievance Procedure which is utilized at Orient Heights and West Broadway and other sites that are using Low-Income Housing Tax Credits or other forms of financing. The BHA 's Tenant Participation Policy (which is also being revised as part of the PHA Plan process) is another policy that should be included, as well as its variation in the Mixed Finance Tenant Participation Memorandum of Agreement (MOA). That MOA may also affect the Community Room Use policy where Mixed Finance housing is involved. BHA revised its Smoking Policy slightly in 2017 to bring it into conformity with federal law. I believe BHA has extended its Violence Against Women Act (VAWA) policy to both its state and federal portfolios. BHA is also working currently on additional Mixed Finance protocols which will extend to its state portfolio where there is redevelopment.

Response: The template has been updated to include the Tenant Participation Policy and the Violence Against Women Act Policy.

Waivers

Comment: (Legal, Grievance & RED) In addition to the ACOP, there should be DHCD waivers in effect for the lease and grievance procedure, to the extent that the lease or the grievance procedure differs from what is in DHCD regulations, and in the Tenant Participation Policy (and related Mixed Finance protocols). BHA's goal is to have one uniform policy as much as possible that would comply with both state and federal requirements.

Response: Thank you for the comment. The section has been updated to include the Tenant Grievance Procedures waiver.

Budget

(Finance whole section)

Comment: On Section 4.1 (p. 1 of 6), it is stated that the 2021 Budget is in the review process. Is it expected that this budget will be provided to affected LTOs and the RAB for review & opportunity to comment, and if so, what would be the time frame for that?

Response: BHA staff are working with DHCD on the state operating budget and it remains in process. BHA staff are receptive to requests to present at an upcoming Resident Advisory Board meeting.

Comment: On p. 2 of Section 4.1, under Operating Reserves, DHCD defines a full Operating Reserve as being $\frac{1}{2}$ of the previous year's operating expenses, and local housing authorities (LHAs) are required to maintain 35% of this amount. (The text goes on to describe circumstances in which an LHA may have a lower reserve with DHCD approval). BHA says that its operating reserve at the end of fiscal year 2020 was a little over \$12.5 million "which is 88.2% of the full reserve amount defined above." This raises a question about whether the BHA is reserving too much and not spending its funds, or if this may be a temporary situation based on delays with construction work due to COVID-19; it would be helpful to know how this compares with the historic trends at the BHA and what normally would be expected.

Response: Thank you for your comment. See above response.

Comment: On p. 3 of Section 4.1, the general news is good in terms of revenue being almost \$3 million over initial projections. There are a few questions:

This shows that the actual revenue from tenants was \$1.2 million above the projected revenue (\$9.9 million in comparison to \$8.7 million). This is phenomenal, particularly if this includes rent collection during the pandemic. Any explanation for this?

Response: Thank you for your comment. See above response.

Comment: I am assuming that line 3111, although also saying “shelter rent” is for fraud recovery, and it shows nothing. One would expect that there would be some degree of recovery in a program as large as BHA’s, and it may depend on what’s counted as “fraud” and how this is accounted for, or what tools BHA has. Thus, on the federal side, BHA uses the Enterprise Income Verification (EIV) system to identify discrepancies between reported and actual income, and if excess subsidy payments are verified as due to tenant error, the tenant is required to enter into an affordable repayment plan (fraud need not be shown). This may be worth some discussion, particular if the zero figures here would cause DHCD concern. It could be that the BHA has merged into the line 3110 some recovery that should be in line 3111 (which may explain why the figure was higher than projected).

Response: Thank you for your comment. See above response.

Comment: On line 3400, why is the MRVP Administrative Fee zero? Given that BHA has over 900 MRVP units, there should be some Administrative Fee, shouldn’t there? (In p. 1, Section 4.2, it’s stated that the Administrative Fee is \$40 per unit per month.)

Response: Thank you for your comment. See above response.

Comment: On line 3610, why did the figure on Interest on Investments leap from zero to over \$120,000?

Response: Thank you for your comment. See above response.

Comment: On line 3690, what is the “other revenue” source (budgeted at \$125,000, but almost \$30,000 higher in terms of receivables)?

Response: Thank you for your comment. See above response.

Comment: On line 3691, what is the new receivable of almost \$70,000 (when this was initially listed at zero) for?

Response: Thank you for your comment. See above response.

Comment: On line 3801, it would help to explain why the DHCD operating subsidy increased (from \$16.5 million to almost \$18 million). Was this in conjunction with the budget the Legislature approved in the summer of 2019? COVID-19 temporary relief? Other reasons?

Response: Thank you for your comment. See above response.

Comment: On line 3802, it's not clear why this line, which would be MRVP subsidy payments to landlords, would be zero, if the BHA has over 900 MRVP units.

Response: Thank you for your comment. See above response.

Comment: Pages 4 and 5 of Section 4.1, on the other hand, are sobering, as they show overall expenses increased by \$9 million, leaving a gap of \$6 million after you factor in the increased revenues. While a number of items stayed within projections or were lower, notable increases were increases of roughly \$2 million for utilities (with the biggest hit in electricity and almost \$3 million in pension expenses. As shown on p. 6, BHA had anticipated having a net balance of \$1.8 million at the end of the fiscal year, and instead was \$4.3 million in the whole. It will be important to discuss with the RAB, with the City, with DHCD, and with legislators how to get into balance and what resources are needed.

Response: Thank you for your comment. See above response.

Capital Improvement Plan

(Capital Construction whole section)

Comment: Since this is the first year that the RAB has to review this, it's hard to know what to compare it to, and what the overall trends have been in terms of capital fund availability and spending. In the federal program, it has been helpful for the RAB to not only get 5-year and annual plan projections, and to see how the BHA has spent funds that were previously allocated. Funds may be reprogrammed due to cost shifts, need to address unanticipated needs, or a site-specific strategy shift (for example, to switch from piecemeal repair work to overall redevelopment over a number of years).

Response: In recent years there has been an escalation of required repairs and maintenance of existing systems across the state-funded portfolio. BHA has implemented an Authority Wide Survey strategy to address these concerns for its common systems, i.e., Building Envelopes, Roofs, Stairwells, Life & Safety, HVAC, Site Work, Utilities, and Accessibility. This approach will identify the systems current condition, the priority of each system, [high priority systems which require immediate repair from medium and low priority systems, which can be safely deferred.] determine the need for repair or replacement and its costs.

Each system survey will consist of the following:

1. Comprehensive System Survey
2. Condition Assessment Report
3. Asset Management Plan

All calculations and cost estimates required are to be provided with the accuracy and detail appropriate for future use in program development which would be expected to be incurred if bid documents were to be produced and opportunities arise for implementation. Additionally, any query within the resulting interactive spreadsheet will allow the buildings to be bundled into packages based on their priority, type of system, site development, and address, which will be used for the basis for preparing construction documents for bidding. This strategy will provide the BHA with more proactive structural approach for both tracking and managing repairs and maintenance of its existing systems.

Comment: In Section 2.1, p. 2, the planned spending exceeds the allocation (both for net formula funding (FF) funds and for unrestricted FF) by roughly \$650,000, and it would help to know how BHA can do that—was there some prior capital balance, not accounted for here, that permitted that?

Response: In the Aggregate Funding Available for Projects in the First Three Years of the CIP Table p 2 of 3. The Allocation amount is just the difference between the two preceding numbers \$13,250,204.85 less \$1,987,530.73. [the differential between Formula Funding (FF) funds and for unrestricted FF represents the balance of unspent FF from prior years plus the new awarded amount less the Emergency Reserve set-aside]

Comment: In Section 2.2, pp. 1-12, as with the federal program, this is the most useful information for the RAB, as it provides specifics as to which items will be funded over the coming 3 fiscal years at which sites. However, the descriptions need to be clear enough so that the RAB (and the public) can make sense of them. There could be some clarification on certain items:

On p. 1, where almost \$1 million was available for fire alarms at West Broadway, and less than \$250,000 was spent to date or is anticipated for spending in the next 3 years, will the balance be reprogrammed, or is it deferred to beyond the period in the chart?

Response: The report is only showing Formula Funding and the special awards DHCD attaches to formula funding and Capital Projects. It is not showing the funding in this project prior to Formula Funding. \$741,817.40 was expended from CFA 1059 established in 2004, 4 years before formula funding began. To date the total development costs of \$849,904 has been expended and the project is expected to be closed out within the next two months.

Comment: On p. 1, what is the Faneuil Decentralization Project, and why are there no expenditures projected out of the over \$600,000 total during the next 3 years?

Response: The Decentralization of the Existing Heating Systems and DHW Systems project SOW included: oil to gas fuel conversions fuel, installation of high efficiency boilers and domestic hot water systems, creation of boiler rooms, venting and electrical upgrades at four buildings. At the completion of the 95% Cd's the estimated construction costs of project was \$9,000,000. This factor along with a number of other considerations the project was suspended.

Comment: On p. 2, where \$22 million is the anticipated costs for Orient Heights Phase II, and only \$700,000 was sent prior to the plan and amounts later are fairly low, there needs to be some accounting for all of this. Similarly, on p. 6, there is \$60 million for Phase III but no schedule provided.

Response: The Orient Heights redevelopment involves financing from several sources other than DHCD's public housing capital funding, and it seems that the Capital Improvement Plan template is not properly reflecting the actual budgets. BHA is working with DHCD to address the issue, but it seems that the CIP template is not designed to integrate the additional sources—meaning, in other words, that we may not be able to correct the CIP tables. However, we offer the complete budget information here.

\$17,250,000	State Capital Funds (expended prior to Plan)
<u>\$34,841,113</u>	<u>Other funds (see below)</u>
\$52,091,113	Total

The "Other" Funds break down as follows:

\$ 2,500,000	State MassWorks grant funds
\$ 10,000,000	City of Boston Funds
\$ 1,830,000	City of Boston Neighborhood Housing Trust funds
\$ 19,896,902	Tax Credit Equity
<u>\$ 614,211</u>	<u>Other Private Funds</u>
\$ 34,841,113	Total Other

The development budget for Orient Heights Phase III is currently projected at \$80,576,726 broken down as follows:

\$ 20,000,000	State Capital Funds (expended prior to Plan)
<u>\$ 60,076,726</u>	<u>Other funds (see below)</u>
\$ 80,576,726	Total

The "Other" Funds break down as follows:

\$ 500,000	CPA funds (via City of Boston)
\$ 19,000,000	City of Boston Funds
\$ 37,608,499	Tax Credit Equity
<u>\$ 3,468,227</u>	<u>Other Private Funds</u>
\$ 60,576,726	Total Other

Comment: On p. 8, for Archdale, it would help to know what the "life/safety" items are.

Response: The Life Safety Systems will primarily be focused on Means of Egress, and Fire detection and Alarm Systems with some of the components listed below:

Means of egress components Exit access, capacity, width, number and arrangement of exists
a. Areas of refuge

- b. Travel distance to exits
- c. Exterior platforms, decks, stairs, ramps (for handicapped access) and railings
- d. Exit discharge to outside from exits,
- e. Interior and exterior illumination,
- f. Emergency lighting,
- g. Exit signs
- h. Panic hardware at exit doors
- i. Self-closing door size and vision panels,
- j. Signage, lighting, complying egress paths to public way

Fire Alarm and Detection Systems including:

- a. Integrity of in building fire emergency voice/alarm communications systems and deactivation.
- b. Fire and smoke detection devices including heat, smoke, radiant energy– sensing devices, fire, gas, carbon monoxide detectors including spacing
- c. Sprinkler systems, water flow alarm and manually actuated alarm initiating devices,
- d. Fire extinguishers
- e. Audible, visual, textual, and tactile appliances & standard emergency service interface.
- f. Circuits and pathways, class designations integrity and performance of circuits and pathways.

Emergency control function interfaces including:

- a. Electrical exit marking
- b. Audible notification systems including area of refuge (area of rescue assistance), stairway Communications systems,

Alarm processing equipment including:

- a. Alarm boxes
- b. Emergency communications systems
- c. Automatic sprinklers including heads, quick response, flow alarm extinguishing equipment
- d. Portable fire extinguishers,
- e. Duct detectors,
- f. Standpipe systems
- g. Remote shut off

Comment: On p. 9, what is the \$2.6 million for the central stores relocation project, and why are there no expenditures listed?

Response: The proposed budget of \$2.6M will be using (non-DHCD) funds and will be secured with a loan, DHCD will be reviewing the construction documents and provide technical assistance.

Comment: On pp.11-12, many of these are listed as “other funds” for which there is no detail. It would help to detail those sources of funds. It’s also not clear how the Operating Reserves figure at Orient Heights Phase III (\$44 million, with then a separate \$16 million in “other funds”) is supposed to be utilized.

Response: As mentioned in response to another comment above, the figures presented for Orient Heights were incorrect. BHA is working with DHCD to update the CIP template if possible. In the meantime, we offer the same response to this comment as we did above.

Comment: Section 2.3 (pp. 1-4) is a narrative accompanying the Capital Improvement Plan. BHA makes clear that its spending level requires an alternate plan due to how individual Cap Share would work. Is there a reason that BHA has not requested additional funding (under section 2)?

Response: Boston Housing Authority has designated \$98,533 for ADA projects.

Comment: BHA indicates in section 3 that the goal is to maintain as many units on line through security and personal safety projects, comprehensive modernization at the Chapter 667 Monsignor Powers site in South Boston, as well as surveys to identify authority-wide needs to roofing, building envelope, and stair hall work. Section 4 notes that prioritizing the Monsignor Powers' work will result in delays to work at some other sites.

Response: Thank you for the comment.

Comment: On section 7, does BHA have a projected date by which it will complete Capital Planning System (CPS) updates?

Response: Although, the CPS updates has not been completed with all the current project information, we will continue to archive our projects as completed.

Comment: On accessibility, does BHA have a projected timetable by which point 5% of its state portfolio will be ADA compliant?

Response: The Authority Wide (AW) Accessibility Survey will be conducted to review the and evaluate the paths of travel throughout the exterior and interior portions of a property, as well as accessible design of parking spaces, ramps, stairs, signage, public spaces, restrooms, community rooms, residential dwellings units, and other special uses. Once this survey is complete the BHA will be able to indicate when they will be ADA compliant.

Comment: For the special needs developments discussed in section 11 (for Chapter 167 or 689 sites), what was required for the lease agreement and the service provider input process?

Response: In accordance with 4d in the Lease/Management contract the BHA and Provider are to have an Annual Meeting - Prior to contract renewal date. The annual meeting described in 4(d) above will also include a reexamination of Capital needs as per the CPS and allow participation by all parties in updating and or modifying the CPS and identifying possible funding sources for the improvements. At the meeting the parties will adopt the Capital Planning System (CPS) and Capital Plans issued through DHCD as the basis for ongoing capital planning for the Premises. The Authority, Provider and Department of Developmental Services (DDS) will review and address any Premises related issues raised by any of the Parties. The Authority is responsible for maintaining the Premises as on element of overall public housing portfolio, so the resources it receives through

any CPS formula allocation must be distributed in an equitable manner respectful to the needs of the entire portfolio.

Comment: Section 12, on energy and water consumption, is not written in a manner which is comprehensible to residents or laypersons—could more be explained here about what the thresholds are and what BHA’s performance is?

Response: 1. The threshold PUM expense levels are set by DHCD and offer a benchmark for measuring a development’s performance.

2. The BHA uses MassEnergyInsight to collate and track energy and water consumption.

3. Our most recent monthly energy reports are for the period 9/2019 through 8/2020.

4. The spreadsheet below in Table 1 lists the developments and their performance relative to the threshold PUM, by utility category provides a tabulated review of BHA’s Utility usage.

5. The Boston Housing Authority is implementing numerous energy and water conservation projects and is reviewing additional tools to analyze the portfolio’s performance.

6. At Monsignor Powers, large-scale envelope projects (windows, doors, insulation, cladding, roof, etc.) and mechanical system upgrades, funded in part by LEAN and a DHCD Comprehensive Sustainability Initiative (CSI) grant, will significantly reduce consumption and improve comfort at the site. See Table 1 appended at the end of responses for further information.

7. The Climate Hazard Adaptation and Resilience Masterplan (CHARM) is a strategic plan that incorporates readily-deployable climate resilience tools that enable DHCD to direct capital funds and provide capacity building to local housing authorities to mitigate climate change vulnerabilities for the residents living in DHCD-supported, locally-managed housing.” The BHA continually looks for ways to implement new strategies by laying out programs, policies, and actions based on CHARM, and to facilitate a better understanding of their building’s climate resilience and how they may be effective by participation, storm surge and temperature.

Comment: On vacancies (section 14), BHA’s rate is far greater than it should be for its Chapter 200 program (7% as opposed to 2%), and is somewhat higher for the Chapter 705 program (3% as opposed to 2%). The explanation given here needs to be fleshed out more, as well as a concrete strategy to bring vacancies within acceptable levels. This affects BHA’s delivery of affordable housing to the many families in need of help.

Response: The BHA is undergoing a large-scale reorganization of the Admissions department and the way that waiting lists are processed which will increase occupancy rates. As of the most recent report we are over 97% in the state public housing portfolio.

Maintenance and Repair

(Operations whole section)

Comment: On Section 3.1 (p. 3 of 7): For the emergency request system, is there any ability to email or text requests for repair, so that there is a record and “phone tag” issues can be avoided? There is a similar question for normal maintenance (p. 4)—it appears that the only system is by phone, and this should likely be supplemented by other means, particularly during the pandemic.

On p.5, while DHCD asks for feedback from tenants on Maintenance Operations, there is nothing to show that BHA incorporated any tenant feedback into establishing the Standard Operating Procedure (SOP) or sought tenant comments regarding whether it has been effectively implemented. The SOP should also be made available to residents for review.

On p.6, the use of hand-held tablets should improve the quality of inspections; interesting, however, that there is NO discussion about COVID-19’s impact on inspections and repairs for this cycle.

In subsection D later on p. 6, good that BHA was able in the last fiscal year to do maintenance within budget (and that extraordinary maintenance costs were only about 35% of what was budgeted). Extra steps required by COVID-19 presumably will make such expenses higher this year.

On p. 7, subsection E, these turnover periods (59 days to do maintenance, and 94 days until new lease up) are unacceptably long, and it would help to know what DHCD’s expectations and how this compares with past BHA performance. Here again, this affects BHA’s ability to carry out one of its key missions, to provide affordable housing to families in desperate need.

Response: The BHA’s work order center is staffed 24 hours, 7 days per week, and any missed calls are rolled to a supervisor’s cell phone, so any phone tag issues should be rare. As part of the implementation of the new work order system, the agency is planning to provide a web-based portal to allow for text-based reporting of maintenance concerns.

The SOP was created as a procedural manual for staff, but BHA acknowledges that the document should be available for resident/public access. It will be posted on the BHA web site.

BHA’s inspection schedule and maintenance delivery has been, and continues to be, impacted by COVID-19. From the beginning of the pandemic, like other public and private organizations, BHA complied with the state shutdown and City requirements, and suspended inspections and significantly limited maintenance to emergency response, and some common area work that could be done without entering units. BHA has gradually expanded the maintenance work (with full PPE), and is now conducting health and safety inspections in units in lieu of full, annual UPCS unit inspections, per DHCD’s direction.

Many of the units in the state program are occupied by long term residents, and as such, the units often require significant reconditioning upon turnover (new cabinets, flooring, etc.). In addition, the amount of redevelopment and the necessary relocation of households that goes along with that can significantly impact the time it takes to prepare and lease units. The needs of households that are being displaced, and the timetables that drive those moves factors heavily into prioritizing the work of turning over the units that fit the needs of those who need to be moved. Both BHA and DHCD use 30 days as the standard for maintenance turnovers. BHA has been much closer to this number

in years with less relocation/unit transfer volume. For context, the BHA's performance for maintenance turnover in the prior FY was 34 days.

Comment: On the Preventive Maintenance Schedule, there is reference to separate guidance on Living Unit Inspection (LUI) and Building & Grounds Inspections in which certain items are to be tracked, but I don't believe those have been provided here.

Response: The inspection schedules are set by each property by March, before the beginning of the FY on April 1. BHA requires each property's annual inspections to be completed on a 10 month cycle, leaving 2 months at the end of the FY for catch-up and clean-up in the event a site falls behind schedule due to staffing, weather, etc. Building and Unit inspections are done quarterly.

Comment: Following this section, there is an untitled (and undesignated) section which discusses deferred maintenance. This notes that this is not a current category for the BHA, but leaves open that it may be used after the BHA completes implementation of its new work order system before the end of the current fiscal year. Some items might be deferred if better done on vacancy, or where best done in particular seasons, or where there is lack of funding, or where there would be efficiencies in combining items by location, task or trade. It should be noted that sometimes having work order tracking may better help justify special grant allocations, such as by showing the need for comprehensive modernization because certain problems simply can't be adequately addressed by routine work orders. However, no resident should have to leave for a prolonged period in a non-habitable unit—this is unacceptable, and the BHA needs to be sure that basic quality of life issues are timely addressed for its residents either through repair or through transfer and avoiding reoccupancy of a unit until it can be restored to habitability.

Response: BHA is committed to providing safe, decent housing for residents. BHA will not consider any policy that would defer work that needs to be done to correct maintenance conditions that would make a unit unsafe for habitation, and would transfer the household if the work cannot be completed while the unit is occupied.

Attachments

(Operations)

Comment: Because of COVID-19, certain items that would normally be in the Performance Management Review (PMR) are being omitted, such as tenant satisfaction surveys. However, as has been evidenced by the continuation of relocation planning and counseling at a number of BHA sites, it should still be possible to get solid information from residents during the pandemic of their views about what is working and what needs improvement.

DHCD and BHA have shared limited survey data that was collected in 2016. While this is of limited utility 4 years later, and the numbers who participated in the survey were relatively small, it's still of some value to look at the data. The Chapter 667 survey response information here shows that BHA is similar to other large LHAs in the Greater Boston area (and actually had a greater number of residents who thought they were dealt with courtesy and respect by LHA staff, had seen the capital improvement plan, or knew about programming).. On the other hand, a higher percentage had

encountered heating problems (41%, as opposed to 29% elsewhere). BHA's response time was better than other large LHAs (45% reported response to heating problems in less than 24 hours, while only 23% at other large LHAs). Perceptions of safety were also slightly better at BHA sites. On the other hand, the tenant surveys for the Chapter 200/705 programs (family public housing) tell a slightly different story. Here other large LHAs did a little better in the perception of courtesy and respect (80% as opposed to BHA's 75%), while BHA did better in terms of the number of residents who had seen budgets, plans, or knew of the BHA director's meeting with residents. BHA's response time for heating emergencies, moreover, was not as favorable for this portfolio, with 36% reporting response within 24 hours (in comparison to 49% reporting this at other large Greater Boston LHAs). Safety perceptions in these sites were also not as favorable as for other large LHAs. This shows the need for improvement in BHA's response and actions for the Chapter 200 and Chapter 705 portfolios.

Response: BHA is committed to improved performance and better communication with residents to be certain their concerns, needs, and priorities inform decision-making. The agency is developing tools to make outreach and feedback easier and more frequent, including the procurement of software that will make it easier to communicate with residents by email and text message notifications to conduct surveys, and better, and more efficiently, inform residents about maintenance issues like planned water or power shutdowns, or the status of repairs that impact multiple units, addresses, or buildings.

Table 1						
Development	Annual Cost	# Units	PUM	Threshold	Exceeds Threshold	
					Yes	No
501 WEST BROADWAY						
Electric (kWh)	\$613,278	486	\$105	\$100	x	
Gas (Therms)	\$180,823	486	\$31	\$80		x
Water (HCF)	\$1,018,356	486	\$175	\$60	x	
504 FANEUIL						
Electric (kWh)	\$282,558	258	\$91	\$100		x
Gas (Therms)	\$13,477	258	\$4	\$80		x
Oil (Gallons)	\$433,404	258	\$140	\$50	x	
Water (HCF)	\$505,994	258	\$163	\$60	x	
505 FAIRMOUNT						
Electric (kWh)	\$385,662	202	\$159	\$100	x	
Gas (Therms)	\$185,131	202	\$76	\$80		x
Water (HCF)	\$369,769	202	\$153	\$60	x	
507 ARCHDALE						
Electric (kWh)	\$373,559	283	\$110	\$100	x	
Gas (Therms)	\$270,263	283	\$80	\$80		x
Water (HCF)	\$540,136	283	\$159	\$60	x	
508 ORIENT HEIGHTS						
Electric (kWh)	\$189,745	239	\$66	\$100		x
Gas (Therms)	\$293,364	239	\$102	\$80	x	
Water (HCF)	\$295,718	239	\$103	\$60	x	
510 GALLIVAN						
Electric (kWh)	\$394,962	249	\$132	\$100	x	
Gas (Therms)	\$423,942	249	\$142	\$80	x	
Water (HCF)	\$436,793	249	\$146	\$60	x	
512 SOUTH STREET						
Electric (kWh)	\$91,104	132	\$58	\$100		x
Gas (Therms)	\$160,233	132	\$101	\$80	x	
Water (HCF)	\$190,469	132	\$120	\$60	x	
601 FRANKLIN FIELD FAMILY						
Electric (kWh)	\$83,554	40	\$174	\$100	x	
Gas (Therms)	\$113,530	40	\$237	\$80	x	
Water (HCF)	\$83,683	40	\$174	\$60	x	
602 FRANKLIN FIELD SENIOR						
Electric (kWh)	\$1,215	32	\$3	\$100		x
Gas (Therms)	\$30,276	32	\$79	\$80		x
Water (HCF)	\$112,615	32	\$293	\$60	x	
603 MONSIGNOR POWERS						
Electric (kWh)	\$129,722	68	\$159	\$100	x	
Gas (Therms)	\$9,978	68	\$12	\$80		x
Water (HCF)	\$55,001	68	\$67	\$60	x	
653 CLIFTON/BALCHELDER-SPEC. NEEDS						
Electric (kWh)	\$13,064	6	\$181	\$100	x	
Water (HCF)	\$22,608	6	\$314	\$80	x	
756 705-6 CONDOMINIUMS						
Electric (kWh)	\$383,623	141	\$227	\$100	x	
Gas (Therms)	\$94,692	141	\$56	\$80		x
Water (HCF)	\$206,575	141	\$122	\$60	x	