Narrative Responses to the Performance Management Review (PMR) Findings

The Performance Management Review conducted by the Department of Housing and Community Development (DHCD) for the 2022 LHA fiscal year resulted in the following ratings. Criteria which received a 'Corrective Action' rating show both a reason for the rating and a response by the LHA. The reason indicates Boston Housing Authority's understanding of why they received the rating, while the responses describe their goals and the means by which they will meet or improve upon the performance-based assessment standards established by DHCD in the PMR. When the PMR rating is 'Operational Guidance', the LHA may have responded, but was not required to.

Category: Management

Criterion: Occupancy Rate - the percentage of units that are occupied on monthly report. Rating: Operational Guidance

Reason: BHA has experienced increased slightly vacancies in the Chapter 200, state family housing portfolio, and is working to improve the make ready, marketing and lease up process DHCD also recommends more frequent updates of vacancy reporting, monthly rather than quarterly, per new CHAMP-related PMR requirements for future PMR reviews.

Response: BHA Operations and Admissions Departments have regular working meetings to pl and monitor progress in improving the occupancy performance and overcome the challenges presented by staffing shortages, supply-chain issues, increased costs and aging inventory, as well as an increasingly competitive local affordable housing market, that features increasing options for low-income households. BHA is also actively improving monitoring and tracking tools to better assist with reporting, and better inform decisions on deploying staff efficiently address maintenance needs, with vacancies as a priority.

Criterion: Tenant Accounts Receivable (TAR) - the percentage of uncollected rent and related charges owed by tenants to the local housing authority (LHA), out of the total amount of rent and related costs charged to tenants.

Rating: Paused due to COVID-19

Criterion: Certifications and Reporting Submissions - timely submission of statements and certifications Rating: No Findings

Criterion: Completion of mandatory online board member training Rating:

Criterion: Annual Plan Submitted - Annual Plan (AP) submitted on time Rating: No Findings

Category: Financial

Criterion: Adjusted Net Income - a measure of overspending or underspending. Rating: Paused due to COVID-19 Criterion: Current Operating Reserve as a percentage of total maximum reserve level. Rating: No Findings

Category: Capital Planning

Criterion: Timely spending of capital funds awarded under the Formula Funding program Rating: Paused due to COVID-19

Category: Facility Management - Health & Safety

Criterion: Health and Safety Violations

DHCD has observed conditions at the LHA's developments and reported the following health and safety violations. The LHA has certified the number of corrected violations in each category.

	Number of violations cited	Number of violations corrected
Maintenance related violations	8	8
Tenant related violations	1	1

Category: Facility Management - Inspections

Criterion: LHA Conducted 100% of the Unit Inspections. Rating: Paused due to COVID-19

Criterion: Inspection reports noted 100% of the necessary repairs in each unit. Rating: Paused due to COVID-19

Criterion: 100% of inspection-related work orders were generated. Rating: Paused due to COVID-19

Criterion: Work order system identifies, tracks, and can produce reports for inspection work orders. Rating: Paused due to COVID-19

Criterion: Inspection work orders were completed within 30 calendar days from the date of inspection, OR if cacnnot be completed with 30 calendar days, are added to the Deferred Maintenance Plan or included in the Capital Improvement Plan in the case of qualifying capital repairs (unless health/safety issue). Rating: Paused due to COVID-19

Category: Facility Management - Work Order System

Criterion: Emergency work orders defined per Property Management Guide, identified, tracked, reportable. Rating: No Findings Criterion: Emergency work orders initiated within 24-48 hours. Rating: No Findings

Criterion: Vacancy work orders identified, tracked and reportable. Rating: No Findings

Criterion: Vacancy work orders were completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver. Rating: No Findings

Criterion: Comprehensive Preventive Maintenance Program exists & preventive work orders identified, tracked, and reportable. Rating: No Findings

Criterion: Routine work orders should be identified, tracked, reportable and competed regularly. Rating: Operational Guidance

Reason: DHCD recommended adjusting routine work order reports to clearly identify whether work orders were initiated by management or by resident.

Response: BHA is adding the "requested by" information to existing work order reports.

Criterion: Requested work orders identified, tracked and reportable. Rating: No Findings

Criterion: Requested work orders were completed in 14 calendar days from the date of tenant request or it not ocmpleted within that timeframe (and not a health or safety issue), the task was added and completed in a timely manner as a part of the Deferred Maintenance Plan and/or CIP. Rating: Paused due to COVID-19

Category: Facility Management - Emergency Response System:

Criterion: Housing authorities has 24 Hour Emergency Response System, Distributed Emergency Definition to Residents, Staff, and Answering Service (if applicable). Rating: No Findings

Explanation of PMR Criteria Ratings

CRITERION	DESCRIPTION
Management	
Occupancy Rate	 The rating is calculated using the following formula: (Total Number of Occupied units on Monthly Report divided by (Total Number of Units Minus Units that Received a Waiver Minus Number of Units Vacant less than 30 days on Monthly Report) "No Findings": Occupancy Rate is at or above 98% Operational Guidance: Occupancy rate is at 95% up to 97.9% Corrective Action: Adjusted occupancy rate is less than 95%
Tenant Accounts Receivable (TAR)	 This criterion calculates the percentage of uncollected rent and related charges owed by starting with the amount reported by the LHA, as uncollected balances for the TAR (Account 1122 from the Balance Sheet) minus Normal Repayment Agreements* divided by Shelter (Tenant) Rent (account 3110 from the Operating Statement) "No Findings" : At or below 2% "Operational Guidance": More than 2% , but less than 5% "Corrective Action": 5% or more
Certifications and Reporting Submissions	 Housing authorities are required to submit 4 quarterly vacancy certifications by end of the month following quarter end; 4 quarterly operating statements and 4 Tenant Accounts Receivable (TAR) reports within 60 days of quarter end. "No Findings": At least 11 of the required 12 reports were submitted and at least 9 were submitted on time. "Operational Guidance": Less than 11 of the required 12 reports were submitted and/or less than 9 were submitted on time.
Board Member Training	 Percentage of board members that have completed the mandatory online board member training. "No Findings": 80% or more completed training "Operational Guidance": 60-79.9% completed training "Corrective Action": <60 % completed training
Annual Plan (AP) Submitted	 Housing authorities are required to submit an annual plan every year. "No Findings" =Submitted on time "Operational Guidance" =Up to 45 days late "Corrective Action" =More than 45 days late

CRITERION	DESCRIPTION
Financial	
Adjusted Net Income	The Adjusted Net Income criterion calculation starts with an LHA's Net Income and subtracts Depreciation, GASB 45 (Retirement Costs), GASB 68 (Retirement Costs), Extraordinary Maintenance (maintenance expense outside of routine/ordinary expenses), and Equipment Purchases – Non Capitalized. This Adjusted Net Income amount is then divided by the Total Expenses of the LHA. If this Adjusted Net Income amount is positive, it means underspending and if it is negative it means overspending. Underspending Rating: • "No Findings" : 0 to 9.9% • "Operational Guidance": 10 to 14.9% • "Corrective Action": 15% or higher Overspending Rating: • "No Findings" : 0 to -4.9% • "Operational Guidance": -5% to -9.9% • "Corrective Action": -10% or below
Operating Reserves	Current Operating Reserve as a percentage of total maximum reserve level. Appropriate reserve level is buffer against any unforeseen events or expenditures. • "No Findings" :35%+ of maximum operating reserve • "Operational Guidance": 20% to 34.9% of maximum operating reserve • "Corrective Action": <20% of maximum operating reserve
Capital Planning	
Capital Spending	 Under the Formula Funding Program (FF), authorities receive undesignated funds to spend on projects in their Capital Improvement Plan. They are rated on the percentage of available funds they have spent over a three-year period "No Findings" = at least 80% "Operational Guidance" = At least 50% "Corrective Action" = Less than 50%

CRITERION	DESCRIPTION	
Health & Safety		
Health & safety violations	DHCD has observed conditions at the LHA's developments and reported health and safety violations. The LHA has certified the number of corrected violations in each category.	
Facility Management		
- Inspections		
Unit Inspections Conducted	 Housing authorities are required to conduct inspections of all their occupied units at least once a year "No Findings": 100 % of sampled units had inspections conducted once during the year "Corrective Action": Fewer than 100% of sample units were inspected during the year 	
Inspections Report	 Housing authorities are required to note all of the deficiencies found during inspections "No Findings": 100 % of deficiencies are noted on inspection report "Corrective Action": Fewer than 100% of deficiencies are noted in inspection report 	
Inspection Work Order	 Housing authorities are required to generate work orders for all deficiencies noted during inspections "No Findings": 100 % of deficiencies noted on inspection reports generated work orders "Corrective Action": Fewer than 100% of deficiencies noted on inspection reports generated work orders 	
Work Order System	 Work order system identifies, tracks, and can produce reports for inspection work orders. "No Findings": Inspection work orders are identified, tracked, and reportable "Operational Guidance": Inspection work orders are not identified, and/or tracked, and/or reportable 	
Inspections Work Orders Completed	 Inspection work orders were completed within 30 calendar days from the date of inspection, OR if cannot be completed within 30 calendar days, are added to the Deferred Maintenance Plan or included in the Capital Improvement Plan in the case of qualifying capital repairs (unless health/safety issue). "No Findings": Sampled inspection work orders were completed within 30 days of inspection date or added to deferred maintenance plan and/or CIP "Operational Guidance": Sampled inspection work orders were completed within 31 to 45 calendar days of inspection date and not added to deferred maintenance plan or CIP "Corrective Action": Sampled inspection work orders were completed in over 45 calendar days of inspection date 	

CRITERION	DESCRIPTION
Facility Management – Work Order System	
Emergency Work Orders Properly Defined	 Emergency work orders should be defined per <u>Property Management Guide</u>, identified, tracked, reportable. "No Findings": Emergency work orders defined per <u>Property Management Guide</u>, identified, tracked, reportable "Operational Guidance": Emergency work orders are not defined per <u>Property Management Guide</u>, and/or identified, and/or tracked, and/or reportable
Emergency Work Orders Initiation	 Emergency work orders should be initiated within 24 to 48 hours. "No Findings": Emergency work orders initiated within 24-48 hours "Corrective Action": Emergency work orders not initiated within 24-48 hours
Vacancy Work Orders	 Vacancy work orders should be identified, tracked and reportable. "No Findings": Vacancy work orders identified, tracked AND reportable "Corrective Action": Vacancy work orders are not identified, and/or tracked, and/or reportable
Vacancy Work Orders Completed	 Vacancy work orders should be completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver. "No Findings": Vacancy work orders are completed within 30 calendar days or if not completed within timeframe, LHA has a waiver "Operational Guidance": Vacancy work orders completed within 31-60 calendar days "Corrective Action": Vacancy work orders completed 61+ calendar days
Preventive Maintenance Program	 Housing authorities are required to maintain a comprehensive preventive maintenance program in which preventive work orders are identified, tracked, and reportable. "No Findings": A comprehensive preventive maintenance program exists and work orders are identified, tracked and reportable "Corrective Action": A comprehensive preventive maintenance program does not exist OR work orders are not identified and/or tracked and/or reportable
Routine Work Orders	 Routine work orders should be identified, tracked, reportable and completed regularly. "No Findings": Routine work orders identified, tracked, reportable and completed regularly "Operational Guidance": Routine work orders are not identified, and/or tracked and/or reportable, and/or completed regularly

CRITERION	DESCRIPTION
Requested Work	Requested work orders should be identified, tracked and reportable.
Orders	 "No Findings": Requested work orders identified, tracked, reportable and completed regularly
	 "Operational Guidance": Requested work orders are not identified and/or tracked and/or reportable, and or completed regularly
Requested Work	Requested work orders should be completed in 14 calendar days from the
Orders Completion	 date of tenant request or if not completed within that timeframe (and not a health or safety issue), the task should be added and completed in a timely manner as a part of the Deferred Maintenance Plan and/or CIP. "No Findings": Requested work orders are completed within 14 calendar days of tenant request OR added to deferred maintenance plan and/or CIP "Operational Guidance": Requested work orders are completed within 15-30 calendar days from the date of tenant request "Corrective Action": Requested work orders are completed in over 30 calendar days from the date of tenant request OR not completed
Emergency Response System	 Housing authorities should have a 24 Hour Emergency Response System and distribute Emergency Definition to Residents, Staff, and Answering Service (if applicable). "No Findings": A 24-hour system for responding to emergencies exists AND definitions of emergencies have been distributed to staff, residents and answering service, if applicable "Operational Guidance": System exists, but no definition has been distributed "Corrective Action": Neither a system nor distributed definitions exist