

Comments and Responses to the BHA FY 2026 State Annual Plan covering April 2025 through end of March 2026.

The following document contains the comments and responses received on the BHA's FY 2026 State Annual Plan covering April 1, 2025 to March 31, 2026. 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, 2024 and the comment period closed on December 15, 2024 with an on-line public hearing held Dec 9, 2024 at 11 AM and an in-person public hearing held December 9, 2024 at 6 PM.

The BHA took several steps to notify the public of the FY 2026 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, 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 Hearings 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](http://www.bostonhousing.org).

## **Overview and Certification**

Comment: (Resident Capacity / Fiscal) Section 1.1 - Overview & Certification p.1 - Outdated reference to DHCD (2<sup>nd</sup> paragraph). It should be noted that 760 CMR 6.09 (cited in last paragraph) was revised in June 2024. There are questions how the changed tenant participation funding may affect the 2024-2025 budget, has there been amendment to the budget, and when will MOAs be amended with BHA's recognized LTOs at state developments and the enhanced \$25/unit funding provided?

Response: References to DHCD that are editable by BHA staff have been updated however some are included in the template and uneditable by BHA staff. Please note that FY25 budget has not been approved by EOHLC and BHA is working with EOHLC on getting it finalized.

Comment: (Operations) p.3 - Note that BHA has 1,985 State Public Housing Units, of which the vast majority are in Chapter 200 (older Family) sites. There are 104 Chapter 667 (Elderly/Disabled) units at Franklin Field and 69 at Monsignor Powers (L Street). There are 142 Chapter 705 (newer Family) units which are scattered site, or at Bowdoin Street or Harwood Street & Winston Road. The bottom two items in the chart lists 5 elderly units in smaller developments (are these Chapter 667) and 52 special occupancy units (are these Chapter 689

units for persons with developmental disabilities)? BHA's state public housing profile is fairly different from other Massachusetts housing authorities, since the vast majority of BHA's elderly/disabled portfolio is federally funded. Note that BHA has plans to dispose of or consolidate much of its Chapter 705 inventory (discussed on several occasions with its Monitoring Committee (which has to approve any dispositions of BHA public housing) and with the RAB on 11/14/24) and this is discussed further below.

Response: The other 5 elderly units in the chart comprise the Basilica property, and are part of the Chapter 667 portfolio. The special occupancy units are part of the Chapter 689 portfolio.

Comment: (Leased Housing) p. 4 – This reflects that BHA has 1,009 MRVP vouchers – a significant increase over the past, as well as a combination of federally assisted housing developments and/or rental subsidy vouchers serving 24,185 households.

Response: Thank you for the comment.

Comment (Resident Capacity) p. 4 I believe there are recognized LTOs at more State sites than listed here (Faneuil Gardens, West Broadway, and South Street) and this should be double-checked. BHA oversees Mixed Finance tenant participation activities at the Orient Heights LTO under a MOA among the BHA, the Developer, and the LTO. Monsignor Powers went through a recognition process right around the time of the pandemic. Several other BHA state sites have in the past had recognized LTOs (Franklin Field Elderly, Fairmount, Archdale, and Gallivan Boulevard), and the Camden Lenox LTO was a LTO recognized to represent tenants at both contiguous state and federal sites prior to the Mixed Finance redevelopment of these sites. BHA should develop a plan to try to assist all of its residents to form LTOs and obtain recognition directly with BHA or through Mixed Finance Tenant Participation MOAs. Recently increased state funding for LTO tenant participation activities (see discussion above) should assist with this.

Response: Monsignor Powers, Fairmount, Archdale, and Gallivan don't have active LTOs and to staff understanding have not for some time. We went out to Monsignor Powers over the summer a few times and there was not enough interest. We are currently working on getting things going at Fairmount and Gallivan for elections. Staff did speak to the resident leaders at Archdale and again they shared that they were not interested at this time. It is likely that there will be another mixed finance tenant meeting in 2025.

Comment: (Resident Capacity) p.5 - The BHA has had a Resident Advisory Board (RAB) since 1999, and it has had a role for BHA state developments since state reform legislation required PHA Plans. The date here reflects that there were new RAB elections in September 2024 and the first meeting of the newly elected RAB was on Sept. 19, 2024.

Response: Thanks for the comment.

## Capital Improvement Plan

Comment: Section 2.1 Capital Improvement Plan (CIP Overview & Funding p. 2 – Good to know from BHA’s notes that it has retained the Accelerated Modernization & Management (AIMM) status for program flexibility and autonomy.

Response: Thanks for the comment.

Comment: p.3 - Is it OK that BHA’s spending for net Formula Funding (FF) exceeds the allocation (by about \$400,000)? Notice that the special funding spending is slightly less than the allocation (by about \$150,000), and therefore the overall spending is about \$275,000 more than the allocation.

Response: The Allocated Funds represent the specific amount of money designated by EOHLC in the CIP for a project calculated based on Formula Funding, i.e., the Award. The Planned Funds refers to the total estimated cost [based on market construction conditions] for the projects scheduled to be undertaken. These Funds may also include funding from multiple sources, which still need to be secured or finalized], i.e., the Proposed Project Cost. In general, Allocated funds represent BHA’s FF annual Award from EOHLC for a three-year period, while Planned Funds represent the overall Proposed Projected costs based on BHA’s estimates during the same period. Although the deviation between these expenditures is approximately 3.3% it is very unlikely these figures would be equivalent to one another due to the different methodology used to calculate these figures. In general, the differences between these figures are reconciled utilizing a dynamic adjustments process. The process allows the BHA to adjust each project, each year, over the life of the CIP’s rolling five-year period. This allows projects to be cancelled, suspended, scope reduced, budget revised, moved to a different fiscal year, and/or phased over several fiscal years.

Although it may appear algebraically the addition of the Formula Funding and the Special Funding figures will result in a net deficit expenditure, which is not the case. This is due to the specific requirements of when and how these funds are used, i.e., Formula Funding is discretionary and be used for any project created by the BHA. Whereas Special Funding such as Targeted Funds can only be used based on criterion set by the EOHLC. Therefore, if a project created does not meet the criterion the funds cannot be used.

## Capital Attachment A

Comment: Attachment (A) is found in the Attachments at the end of the State PHA Plan, and actually appears after Attachment (B). As stated on p. 1, BHA’s objective is to increase the supply of affordable housing units across its portfolio, and to the extent possible, to prioritize projects and programs that allow it to meet the goal of providing a high quality of life.

Response: Thanks for the comment.

Comment: P. 2 lays out the HVAC modernization work at Msgr. Powers, coupling \$8.3 million in formula funding with \$2.1 million in funding from ABCD.

Response: Thanks for the comment.

Comment: Page 3 is for the \$98,800 in stair hall systems surveys.

Response: Thanks for the comment.

Comment: Page 4 is for \$96,390 in design work on the DDS group home at 76-78 Torrey St. Pp. 5-6 is for \$155,899 in design work on the DDS group home at 1492 Tremont St. For both these sites, what is a projected date for starting and completion of reconstruction?

Response: Although, the Investigative Site Development Study of Phase I is scheduled to be completed by 11/01/2025 there is no projected construction start and/or completion dates under this Phase. The projected construction milestones dates will be developed under Phase II. The Phase I work is limited to the exploration and development of the site and increasing the density for residential apartments within the confines of the building and zoning codes for both DDS and Family Housing.

Comment: P. 6 is for \$558,000 in load centers at Gallivan Blvd.

Response: Correct, thanks for the comment.

Comment: Pp. 6-7 is for \$88,000 to survey mechanical systems BHA-wide.

Response: Correct, thanks for the comment.

Comment: Pp. 7-8 is for \$713,000 for transformer work at West Broadway.

Response: Correct, thanks for the comment.

Comment: On pp. 9-10, there is \$1 million slated for sustainability work in a 3-family unit at 21 Maryland Street—is this part of the Chapter 705 portfolio? This seems like a very large investment in a small property, and BHA should explain more why this is justified, even if it would come within sustainability objectives.

Response: This dollar value only represents the funding placeholder provided by EOHLC for CAPHub's project's budget and does not reflect the actual cost for Construction. The project cost prior to bid is estimated at \$625,000.

#### Capital Attachment B

Comment: Attachment (B) is found in the Attachments at the end of the State Plan (and as noted above, Attachment (B) precedes Attachment (A)). The 7-pages include the following -- \$8.75 million repositioning NOFA for the Chapter 705 portfolio—see notes above under this topic in Attachment (A). This is specifically to construct 25 replacement units (as part of Old

Colony redevelopment) and utilize EOHLC's Moving to Work authority to switch the operating subsidy to Section 8. Would this Section 8 be administered by BHA, or EOHLC? These units should be subject to all the BHA Mixed Finance protocols that cover Old Colony (such as the Mixed Finance Tenant Participation MOA and the Mixed Finance Grievance Procedure). It is important that all the deeply affordable units at Old Colony have similar protections to avoid any confusion.

Response: Attachment B was inversely inserted before Attachment B and the order has been corrected. The new apartment units will be part of the larger Old Colony redevelopment. BHA will administer the Section 8 subsidy. As with all units at Old Colony, the MOA for Resident Participation and the Mixed-Finance Grievance Policy will apply.

Comment: On pp. 2-3, Franklin Field elderly, is there a total of \$590,000 in funding from the variety of sources discussed here? This is a site beautification project (Phase I) and does not draw on EOHLC funds, but it is good to include this so that residents and the public are aware of the range of work being done at different sites and when the funding is coming from non-EOHLC capital sources. Is this ongoing work that already started (wonder given the reference to the award period of FY 22-24), or is this work which hasn't begun but BHA anticipates will be done in the coming year?

Response: Yes, a total of \$590,000 is funded from a variety of sources, Phase I is presently in construction and is scheduled to be completed by early spring. Phase II, 100% Construction Documents are being completed and will be advertised after the documents are reviewed and approved. The goal is to have a seamless continuation from Phase I to Phase II for this project.

Comment: Pp. 3-4—This appears to be a separate site beautification grant (Phase II) at Franklin Field Elderly from what's discussed above, and again the question whether the total amount is the combination of the two amounts listed (i.e., \$645,000), again drawing from non-EOHLC sources.

Response: Yes, the total is \$645,000. However, Phase I and Phase II are two distinct and unique projects with independent funding sources, which are not combined. However, because of the way the project has been designed it will appear as single project once both Phases are completed.

Comment: Pp. 4-5 —This refers to Archdale, and over \$695,000 in non-EOHLC CPA funds for playground/parkland. It should be noted that Archdale is a site that is in need of significant modernization/rehabilitation work, and in the past BHA has identified this as a site for potential redevelopment—so it may be helpful to know that the current plans are for Archdale, and particularly how long these improvements may be utilized before other work may affect them.

Response: At present there are no plans for the redevelopment of Archdale. Based on the metrics for commercial playgrounds, which utilize weather, maintenance, equipment, usage, and surface type to determine the lifespan of playground, it was found under certain

circumstances playgrounds may have a useful life greater than twenty (20) years. The normal range for a playground useful life is between eight (8) and ten (10) years. Under the normal range of a playground's useful life, the Archdale Families could expect to receive the benefit of the full life expectancy of the playground installation prior to any proposed development at Archdale.

Comment: Pp. 5-6 – This involves Digital Equity Funds (what is the source of these funds?) to create wireless access points at four state sites—Gallivan, West Broadway, Monsignor Powers, and Franklin Field Elderly. Does BHA have a planned timeline for having wireless access points at all of its state sites? Will all buildings have wireless access at these sites?

Response: Funding Source: Local Housing Programs Earmarks 7004-0107 from the Digital Equity Fund for \$100,000. At present the Five-Year CIP does not include any projects for the installation of wireless access points for the remaining state portfolio sites. While the goal is to provide all sites with wireless access no timeline has yet to be established. The existing plan only provides wireless access connectivity to the task force, and BHA's management and maintenance offices.

Comment: p. 6 – This discusses \$20,000 in climate change vulnerability study at West Broadway (see discussion under Attachment (A) above).

Response: The West Broadway Project for \$20,000 appears in both Attachments, because of its dual classification, In Attachment A, the project is included in BHA's Sustainable Initiatives, and In Attachment B, it is also included under the Grant and/or Award for the SUST- FY25 Resiliency Award from EOHLIC.

Comment: Pp. 6-7 – This lists \$1.6 million in ARPA (non-EOHLIC) funding for roof repairs at South Street and Archdale. As noted above, given past BHA statements about redevelopment strategies for Archdale, it would be good to know how all of this synchs. Obviously residents should not be living in buildings with deficient roofs, but if there is a plan to redevelop, there are questions of how money should best be spent on short-term and long-term strategies. If, on the other hand, BHA's approach at Archdale may be modernization but not overall redevelopment, then tackling roofs, and later coming back for other systems, may make sense.

Response: At present there are no plans for the redevelopment of Archdale. The Archdale Development has 6 Buildings, containing 288 apartments. The Roofs were last replaced in 2002 in which the 20-year warranty expired at the end of 2022. In 2021 the roofs in this Development were surveyed and recommendations by the Designer was made to address the urgent concerns, which included, but not limited to: egress, torn, cracked, peeling, and/or deteriorated flashing, clogged drains, leaks at penthouses and chimneys. The recommendation for Building five (5) was to have the entire roof replaced. Water infiltration has exacerbated the situation causing residents to be vacated. The benefit of ARPA funds received allowed the BHA to effectively schedule the work to be complete in one FY instead of phasing the work over several years.

A phased approach would have only resulted in escalated costs and worsening conditions, to meet the bare minimum of work required to mitigate these roof conditions.

Comment: p. 7 – This discusses \$789,000 in ARPA (non-EOHLC) funding for building envelope renovations at “22-128 & 130-138 Blue Hills Avenue”, listed in the Jamaica Plain/Roslindale neighborhood. BHA should check the address, as it is likely “122” rather than “22”. GBLS is not familiar with this address, but it may be a Chapter 689 unit, and it should be noted that this is NOT Blue Hill Avenue in the Roxbury/Dorchester neighborhood. There has been little discussion by BHA with the RAB or the public regarding its Chapter 689 and group home portfolio and the agencies that it partners with to deliver critical housing, and this would likely be worth an overall summary for the RAB.

Response: The numeric address error has been corrected and changed to 122. The development is a 705/756 scattered site located in Roxbury. The BHA Staff from both CCD and RED would welcome the opportunity to address the intent and goals of the Chapter 689 portfolio in a summary to RAB.

## Section 2.2 CIP Projects

Comment: While the 13 pages here are helpful in tracking total costs of different capital projects, what has already been spent, what remains to be spent in the current fiscal year, and then planned expenditures for the coming 5 years, it may be helpful to have the same sort of spreadsheet chart that Capital Construction developed for BHA’s federal developments, at least for the “mainstream” units (Chapter 200 and Chapter 667). It may be that given the planned transition of the Chapter 705 program, as well as the difference between the Chapter 689 units (which are not directly operated by BHA) and other units, the chart can be limited to just the Chapter 200 and 667 developments. It’s also not clear what the logic is for the ordering of these pages, and if there is some underlying organizational basis that it be explained to the RAB and the public. Some items also don’t really provide any meaningful explanation or transparency—for example, the last item on p. 13, Energy Pilot (035524), says that \$3.1 million is provided in Other funds, but doesn’t have a description of what will be done, when, or what the other funding sources are.

Response: The proposed federal developments spreadsheet for the current fiscal year, and planned expenditures for the coming 5 years will be brought to the attention of BHA’s federal portfolio team for consideration. The contents of the table are created from the information input into CIMS, which compilation data populates the Sec. 2.2 - CIP Projects template. This format and data cannot be altered and/or be limited. Note: Pages 1-9 are in ascending order of Formula Funding projects based on EOHLC’s project numbers. Pages 10-13 are in ascending order of Special Awards and Other Funding projects based on EOHLC project numbers. The information provided in this table is general in nature and does provide an in-depth explanation.

A more comprehensive review and explanation of this project will be found in next year's CIP under ATTACHMENT (B) GRANT and/or AWARD. Projects get included in this table once they are moved from the CIP planning phase.

### Section 2.3 CIP Narrative

Comment: The discussion here is helpful for understanding other documents. For example, Item 1, Request for increased spending flexibility, and use of the Alternate CIP, described the problem BHA might have, in any given year, showing that price remained within benchmarks, but since the longer 3- and 5-year benchmarks were met, the alternative achieved its purpose.

Response: Thanks for the comment.

Comment: On p. 3, item 7, there is reference to an update of the Capital Planning System data through 11/30/24. I'm not sure how this has been done, since it is not yet 11/30/24, but if BHA could share the latest CPS facility data, that would be helpful.

Response: The 11/30/24 was included in error and has been changed to 10/31/24.

Comment: On page 3, item 9, there is a response that "We have not been able to include all of our high priority (CPS priority 1 and 2) projects in our CIP—see attached. I am not sure what "see attached" refers to, since I didn't see an attachment to Section 2.3. If "attached" is simply the CIP submitted, that's fine. If, on the other hand, this was intended to be a list of all of the CPS Priority 1 and 2 projects, only a subset of which could come within the CIP, then it would be very helpful to have that, as it would show what range of things BHA had to weigh in deciding to prioritize the CIP list, and what further needs have to be addressed possibly through other funding sources.

Response: The CPS priority 1 and 2 projects in the CIP are listed in Sec 2.2 – CIP Projects on pages 1-13. The Word "see attached" has been removed".

Comment: Under p.3, item 11, this discusses an annual service provider input process for the Chapter 167 or Chapter 689 units affiliated with DMH or DDS programs, and indicates that such a meeting took place in April 2024. Can BHA share what came out of this survey—i.e., what the provider(s) said and how BHA responded?

Response: A Capital Needs Assessment profile was created for each site based on DDC's concerns discussed during the meeting. Each item of concern was discussed, reviewed, categorized, and then prioritized based on DDC's concerns and Facility Component Index "FCI". DDC's input and the FCI number were utilized to determine what action would be taken and when the work would take place in the CIP's rolling five-year plan. In general, the projects created for the Chapter 167 or Chapter 689 units would address the following immediate concerns: kitchen & baths, exhaust fans, ventilation upgrades, appliances replacement, decks, egress ramps, exterior lighting, flooring, and handicap ramps. Note the project concerns listed above are specifically for one or more of the sites noted. Other Items reviewed included:



recently completed project on Tremont Street, which was a building envelope project. The work included siding, gutters, windows, doors, and site utility upgrades; Operational concerns by the management company were also addressed, including ongoing water back-ups during showering at Torrey Street; Non Facility items discussed included leases and the planned development for both Tremont and Torrey Street.

Comment: On pp. 3-4, item 12, energy and water consumption, the chart on p. 4 describes what the EOHLC thresholds are for PUM for electricity, gas, oil, and water, and says that no BHA development exceeds the threshold. However, at the same time, it's stated that "due to the size of the BHA inventory, the method of reporting energy usage is not submitted in a way that will ever update the table above", and additional PUM Energy Usage is included in a table at the end of the PHA Plan. It is not clear what this means, what consequences it has for the Authority, or if there may be alternates so that usage can be better tracked (and information can be updated). Can BHA say more so that this is intelligible to the public?

Response: The language "No development exceeds threshold values" is incorrect and has been removed from the last version. Note for clarification the following phase has been restated: Due to the size of BHA inventory, the method of reporting energy usage cannot be submitted or updated using the existing PUM table format. Please refer to the modified "PUM Energy Usage Table" found after the Executive Office of Housing and Livable Communities (EOHLC) PMR Physical Condition Report and before Attachment A

Comment: On p. 4, item 13, the text under "Energy or water saving initiatives" appears to have some typos and missing words, and should be fixed.

Response: Note for clarification the following phase has been restated: Boston Housing Authority is currently not pursuing any specific portfolio wide water-saving audits or grants. However, the BHA relies on its own utility data management system to track electricity, natural gas, water, and oil use. The data is used to verify and confirm reduction in the utility usage over the entire portfolio, which has resulted from the implementation of energy efficient measures, controls, and equipment. Additionally, the BHA has improved internal data reporting capabilities to comply with local building performance ordinances. BHA continues to explore energy management systems since it discontinued use of the state's MassEnergyInsight system.

Comment: On p. 4, item 14, BHA's vacancy rate is at EOHLC's goal for Chapter 200 units, but is slightly above it for Chapter 667 units, and substantially above it for Chapter 705 units. However, BHA's response solely focuses on vacancy reduction efforts at Archdale and South Street and doesn't discuss the Chapter 705 program at all. It could well be that BHA is keeping Chapter 705 vacancies unfilled because of the larger disposition strategy for these units, but it should address this specifically in this portion of the PHA Plan.

Response: The BHA is presently undertaking two major projects, which includes the Authority Wide Building Envelope and Urgent Roof Repair and Replacement for the Chapter 200 units. These projects will address the water infiltrations, which has rendered some units

uninhabitable and has contributed to the vacancy rate at South Street and Archdale Developments. Construction and scheduled to be completed between FY24 and FY25. The high vacancy rate noted in Chapter 705/756 units is due to their transitioning of these units to BHA's homeownership program, which has effectively frozen the re-occupancy of units which are vacant. These units are scheduled to undergo complete modernization by the BHA prior to the sale of the units. As comment states, BHA is not currently filling Chapter 705 vacant units due to the planned disposition of these units.

## **Maintenance and Repair**

### **Comment: Section 3.1 Maintenance Overview**

In general -- It should be noted that Victor Williams (in his remarks to the RAB at their 11/14/24 meeting) mentioned a new categorization for work orders --"urgent", in addition to "emergency" and "regular". "Urgent" workorders show that if a matter is not addressed relatively quickly, it could lead to a serious health/safety issue, but the item does not have the same immediacy as an emergency work-order. As discussed in GBLs' separate comments on the federal 5-year plan, BHA should establish routine goals of completion of emergency work orders in 24 hours, urgent work orders in 5 days, and regular work orders within the time frames required by the State Sanitary Code (30 days). EOHLC recognizes that sometimes back-ordered parts or repairs related to major capital needs may mean an item is not completed in these time frames, but those should be exceptions to the rule. Similarly, 30 days should be the rule of thumb for vacancy turnovers, while recognizing that EOHLC waivers can be appropriate if there is some justification for a delay. BHA should be living up to the goal of not having preventable turnover delays deter it from full utilization of its housing stock for low-income families in need of housing. These goals should be monitored system-wide and by development (so that site-specific strategies can address problems), and this should be an element or both the federal and the state plan.

Response: In addition to aligning work order priorities with HUD and EOHLC guidance and requirements, BHA is continuing to work toward improving the efficiency of maintenance delivery and performance, while working with our software vendor to continue enhancing capability to monitor progress city-wide, as well as at the portfolio and property level. Reducing the backlog of work orders will allow site maintenance supervisors to focus more on maintenance delivery and less on reconciliation of outstanding, and often duplicative, work

orders. BHA is hoping to improve turnaround time for all categories of work orders but it is a process.

Comment: PP. 5-6—BHA has described here a number of updates/revisions that it has made to its maintenance and work order system over the past year. If there are additional updates (for example, BHA promised a fuller response on certain Corrective Action items—see Section 5.1, below), this should be updated, or it could be cross-referenced if it is more up-to-date than other portions of the Plan.

Response: BHA remains engaged with EOHLC regarding the Corrective Action Items, and will meet with them specifically on the maintenance items in the month of January. Where appropriate, BHA staff have updated PMR narrative responses.

Comment: p. 6—This shows, under Section D, an extraordinary maintenance budget that is almost three times the amount spent in the prior year. It would be helpful to explain the difference.

Response: For the prior year, BHA determined that a significant amount of work should have been more accurately captured as extraordinary maintenance, rather than hitting individual site budgets as regular maintenance costs. The change reflects efforts to remedy this moving forward.

Comment: p. 6 – This shows, under Section E, that it takes BHA 34 days on average to make a vacant unit “maintenance ready”, but then it is 89 days until lease up. This is not acceptable. What steps is BHA taking to reduce the time for lease up?

Response: Some of the extended lease up time is the result of some difficulties with the CHAMP statewide waiting list application process, which BHA has worked on collaboratively with EOHLC to improve. BHA is also making efforts to work proactively with supportive housing programs to expand the applicant pool to supplement the potential clients who apply via CHAMP.

Comment: There are some unnumbered pages following Section 3.1 entitled “BHA Deferred Maintenance, DHCD Annual Plan, 2026”. There was something similar that BHA provided last year. Is this any different?

Response: There are no changes in the document, but the utilization of a deferred maintenance plan is under consideration.

#### BHA Preventive Maintenance Guide

Comment: BHA Preventive Maintenance Guide: This is a very long document and has been reviewed as part of the PHA Plan process in prior years, but the document does not contain red lines or strike outs to indicate edits/revisions from last year’s version. Can BHA provide such a document?

Response: There are no changes.

## Operating Budget

Comment: Section 4.1 Annual Operating Budget p.1 - As noted here, this shows budgeting for the period that ended March 31, 2024 as well as the approved budget for the period from April 1, 2024 through March 31, 2025. It notes that the proposed budget for April 1, 2025 forward is not yet available and is usually prepared in the final month of the fiscal year. Since BHA's Monitoring Committee does review the budgets, can the proposed budget for the coming year be shared with the RAB once it's prepared? Moreover, as discussed below on pp. 3-6, what BHA has provided does not match what was supposed to be provided.

Response: BHA will make sure that the proposed budget for the coming year be shared with RAB once the release is approved by Legal. EOHLC has its own format for the budget. What was provided to Monitoring Committee was a summary budget for FY25 that matches prior submissions. Please note that FY25 budget has not been approved by EOHLC and BHA is working with EOHLC on getting it finalized.

Comment: p.2 - This notes that BHA's Operating Reserve is 31% and slightly less than the recommended amount of 35%. It notes that EOHLC must therefore approve any expenditures of the Operating Reserve except for health/safety issues. Has BHA been spending the Operating Reserve for anything other than health/safety issues, and if so, has the required EOHLC prior approval been obtained?

Response: In FY25, BHA spent \$803,953.00 in Operating Reserves for HVAC and Energy Upgrades at Monsignor Powers. The expenditure was previously approved by EOHLC in lieu of Capital money.

Comment: Pp. 3-6 – The format here does not match what's described on p. 1 – i.e., none of the figures for 2024-2025 are provided, and so no comparison with 2023-2024 amounts can be made.

Response: FY25 Budget has not been approved by EOHLC. It is still a work-in-progress and will be provided once it is finalized.

### Section 4.2 Explanation of Budget Accounts

Comment: Pp. 1-7 – These pages merely contain EOHLC's explanation as to how line items in Section 4.1 are to be prepared, but do not provide any explanation on any BHA actions. As noted above, since pp. 3-6 of Section 4.1 appear to be incomplete, it's difficult to do anything with this.

Response: FY25 Budget has not been approved by EOHLC. It is still a work-in-progress and will be provided once it is finalized.

## **Performance Management Review**

Comment: (Operations / Fiscal / Admissions) Section 5.1 Performance Management Review (PMR) Narrative Responses (see also notes under the actual Performance Management Review Reports, below, after Section 9.1) p. 1 –Management. For Tenant Accounts Receivable, BHA said that it is in the process of preparing a response that covered all the requirements that need to be addressed to improve performance and will update this section soon. Is this update now available for RAB and public review? If not, when will it be available?

Response: This work remains in progress. Improving Tenant Accounts Receivable is one of the BHA's top priorities for calendar year 2025, and the Authority is focused on providing property management staff with additional tools and training to assist with rent collection and navigating the legal process, as well as evaluating and streamlining lease enforcement procedures.

Comment: (Fiscal) p. 2 – Financial. BHA said that it was in the process of preparing a detailed response. Is this available? If not, when will it be available?

Response: BHA Finance is meeting with EOHLC monthly to discuss the recording of non-operating financial transactions that are related to disposed properties such as Orient Heights that should address the issues identified in the PMR.

Comment: Pp. 2-3 - CHAMP. BHA acknowledged that the date & time were not easily visible on the paper applications, and it had taken steps to address this with new time stamps and ribbons and placement of the time stamps in more accessible locations. BHA further acknowledged that incomplete applications were not processed as they should have been under EOHLC protocols, and that incomplete applications would be entered and uploaded so they could be tracked. However, as to the separate CHAMP Corrective Action on vacancies, BHA's response just repeated what was said about incomplete paper applications, and did not address the vacancy reporting at all. This needs to be fixed.

Response: Thank you for your comment we have corrected our error. In post PMR meetings with the state, EOHLC has provided BHA with guidance on correcting the vacancy reporting issue, and directed BHA staff to specific CHAMP reports that contain the client information necessary for vacancy reporting compliance in advance of the next PMR.

Comment: (Operations) Pp. 3-4 –Facilities Management – Inspection Standards & Practices. BHA said that it would continue efforts to increase efficiency of maintenance delivery, improving customer service, and maximizing the capacity of the work order software and other technology resources to better communicate with residents, eliminate duplication & unnecessary data entry and ease burdens on both maintenance and administrative staff. There

is also reference to software upgrades and implementation of the Work Order Touch phone-based app. As noted below, BHA has done a lot in this area in the past year and it may wish to expand on this response.

Response: Much has been done, but many of these initiatives are still taking shape and are in the planning process. BHA will certainly share more information on major initiatives with residents and stakeholders as developments progress.

Comment: (Operations) p. 4 – Facilities Management – Vacancy Turnover Standards and Practices. Here again, BHA's response seems to just be focused on ordinary work-orders, and not on the specific EOHLC focus on vacancy work-orders and turning around vacancies within 30 days. BHA should revise its response.

Response: BHA has taken steps to ensure that the necessary unit turnover work orders are created for all vacancies upon move-out, and BHA staff will meet with EOHLC staff on the maintenance portion of the PMR during the month of January for additional guidance and discussion on this portion of the PMR. Staff from BHA and EOHLC now meet on a monthly basis to discuss the status of vacancies.

## **Policies**

Comment: (Admissions / Resident Capacity) Section 6.1 Policies, This appears to fairly summarize the BHA policies and the years that they were last updated. It should be noted that ACOP changes have also been proposed for this year, and to the extent that these are updated, there should be a revised date. Some of the changes are mandated by EOHLC regulation changes which took effect in the middle of 2024. BHA should make sure that it updates any policies or forms that may not reflect the EOHLC revisions (for example, the BHA's Memorandum of Agreement (MOA) with state sites may still refer to the lower level of resident participation for state assisted housing, rather than the \$25/unit amount that EOHLC adopted in mid-2024).

Response: Thank you for the comment.

## **Waivers**

Comment: Section 7.1 Waivers, This refers to BHA waivers for the Grievance Procedure and the Admissions and Continued Occupancy Policy, respectively obtained in 2019 and 2021. As noted above, there are some further Policy changes this year in the ACOP, so may want to use the 2023 or 2024 dates, and I believe BHA also revised the Grievance Procedure slightly since 2019. The waivers were needed to align federal and state requirements where similar language could be used. (At times, either HUD or EOHLC do require different treatment of federal and state public housing, and where this is the case, it is laid out in the ACOP and Grievance Procedure.)

Response: Thank you for the comment.

Comment: (Operations) As stated in prior years, GBLS would recommend that BHA also apply this same approach to waivers for Resident Participation and for its Public Housing Lease. Thus, BHA has by and large used a merged lease for its state and federal programs, and it has one overall Resident Participation Policy (RPP) that describes all aspects of resident participation in both state and federal public housing (and in Mixed Finance housing.) While, in a few places, the RPP refers to different procedures for federal and state developments (as required by regulations), most aspects are merged.

Response: Thank you for the comment.

### **Other Elements (Tenant Satisfaction Surveys, PMR Report)**

Comment: Performance Management Review (PMR) Report (Including CHAMP Close Out Report and Physical Conditions Report) --See also Section 5.1, above.

This report, from March 2024, indicates Operational Guidance was given on the BHA's Occupancy Rate for its Chapter 667 portfolio, that Corrective Action was required for the Chapter 667, Chapter 705, and Chapter 200 portfolios, as well as cumulatively, for Tenant Accounts Receivable, that Corrective Action was required for Adjusted Net Income, and that Operational Guidance was given on Operating Reserves. All other categories were listed as "No Findings" or "Not Applicable". There are separate PMR reports on CHAMP and Physical Conditions, discussed further below. On the main PMR, EOHLC provided detail a few pages later --

Response: Thanks for the comment.

Comment: (Operations) On Chapter 667 vacancies, the operational guidance was that BHA needed to use the on-line vacancy system, with all vacancies reported and quarterly certifications provided verifying all data, and waivers requested where applicable. Turnovers needed to be reviewed weekly or biweekly with staff to monitor status of vacant units, and a

plan should be developed for updating units with long-term vacancies to limit vacancy turnover time. While the Operational Guidance said it was for the Chapter 667 units, it actually went beyond that, since it said that “family units may need consistent attention” to make sure conditions were not affecting vacancy turnover time. Can BHA describe what steps it has taken to respond to this Operational Guidance on vacancies?

Response: Staff from BHA and EOHLIC now meet on a monthly basis to discuss the status of vacancies and waiver requests for vacant units in the state program to ensure that all units that are eligible for waiver consideration, both family and elderly, are being tracked, reported and approved if waiver conditions are met. In the case of a long-term vacant where it has been determined that there is extensive work, the BHA will be more proactive to contract work out permitting BHA maintenance staff to prioritize vacants with quicker turnover potential.

Comment: (Operations) On Tenant Accounts Receivable (TAR), the Corrective Action required BHA to adhere to its rent collection policy & lease regarding the sending of notices, reminder letters, 14 day notices to quit, 30-day notices, with notices going to tenants early and frequently, that tenant who vacate with balances due be reported to credit bureaus, that BHA create written repayment agreements (either in-house or in court) and ensure they are followed, evaluate vacated balances to better understand what is collectible and what is unlikely to be collected, and not allow balances to build up before pursuing lease enforcement and set reasonable thresholds for starting legal action. We would like to know how BHA has responded to this, and would welcome being part of a dialogue on this. If there is a rent collection policy, it would be good that it be shared. BHA and the City have had a robust policy of tenancy preservation and homeless prevention. At the same time, it is important that balances not build up, and that out-of-court realistic repayment arrangements be pursued to avoid the collateral consequences of court involvement for future housing prospects. There are times when there may be conditions of disrepair that should be factored into any negotiated resolution (i.e., abatement and repair plans as well as repayment). There are other times where a balance may be higher than it should be because a disability or other circumstances interfered with timely recertification. A number of cases may fit into “good cause” criteria for use of RAFT funds and G.L. c. 239, sec. 15.

Response: Improving Tenant Accounts Receivable is one of the BHA’s top priorities for calendar year 2025, and the Authority is focused on providing property management staff with additional tools and training to assist with rent collection and navigating the legal process, as well as evaluating and streamlining lease enforcement procedures. BHA remains committed to the preservation of tenancy, whenever possible, and will share any proposed rent policy changes and welcome dialogue and feedback before major policy changes are made.

Comment: (Fiscal) Under Adjusted Net Income/Revenue, the Corrective Action is two-fold. First, salary expenses should be monitored throughout the year, and over- or under-spending in certain budget lines can be fixed by reducing or increasing other lines to insure staying within the guidelines. Second, BHA staff should work with EOHLIC finance staff to review the ANI



metric and identify criteria to monitor spending throughout the year. What follow-up has happened on this recommended Corrective Action?

Response: BHA is working with EOHLC to get our budgets approved in a more timely fashion. Budget approval is the first step to address overages by line item. Additionally, BHA and EOHLC are conducting monthly meetings to identify areas of concern and address budget changes.

Comment: (Fiscal) Under Operating Reserves, EOHLC's Operational Guidance refers back to some 2018 and 2019 protocols on reserves. It's noted that a LHA may spend down up to 35% of its maximum reserve without EOHLC consultation but must ensure that the expenses are included in the right line-items, and that if the expenses occurred after EOHLC approval, there should be a budget revision submitted. If, on the other hand, expenditures of operating reserves may bring them below the 35% of maximum reserve level, EOHLC written approval is required, unless the expenses are for health/safety issues. Given how this operational guidance is written, it is not clear what EOHLC is saying that BHA did not do and needs to change. Can BHA clarify that, as well as any additional steps it took in response to this Operational Guidance?

Response: BHA always make sure that EOHLC written approval is obtained prior to spending our operating reserves.

Comment: (Admissions) CHAMP Close Out Report. Corrective Action is required for CHAMP criteria 1b, 2a, and 2b, and Operational Guidance is provided on CHAMP criteria 1c. (There were no findings or recommendations as to CHAMP criteria 1a, 3a, 3b, or 3c.) As noted above, some of the more detailed responses by BHA outlined in Section 5.1 don't appear to fully answer questions posed by EOHLC.

Response: Thank you for your comment we have corrected our error. Staff will work to address the questions posed by EOHLC through regular meetings and are available to meet with the RAB upon request.

Comment: (Admissions) For CHAMP criterion 1b, Corrective Action says that BHA should prioritize (1) the intake of CHAMP paper applications to ensure that all applications are date- and time-stamped, (2) the data entry of paper applications to ensure that they are in CHAMP accurately, and (3) ensure that applicant ID numbers recorded in the vacancy system match the CHAMP ID number. See also comments on Section 5.1, above.

Response: BHA acknowledge that the date and time were not easily visible on our paper applications. We understand the importance of accurate documentation and have taken immediate steps to address this concern. To correct this issue, we have replaced all ribbon components in the time stamps and ordered new time stamps to ensure proper functionality. Additionally, we have instructed all staff to consistently place time stamps in a clearly visible area for better accessibility.

BHA acknowledge that incomplete application were not processed, as per the protocol. Moving forward, BHA will ensure that any incomplete applications are entered and uploaded to the CHAMP database for tracking purposes.

Comment: (Admissions) For CHAMP criterion 1c, EOHLC's Operational Guidance says that data entry from CHAMP paper applications should be prioritized to reduce the number of cases entered more than 30 days from receipt, and notes that EOHLC performance measures are that 98% of all applications should be entered within 30 days. What have BHA's numbers been, and what action has BHA taken in response to this Guidance?

Response: We typically receive three to five paper applications each week.

Comment: For CHAMP criterion 2a, EOHLC has directed BHA take Corrective Action to ensure that all vacancies are recorded within 30 days of the vacancy date, make sure that all vacancy data is correct within that same time frame, and establish calendar reminders to help make sure these steps are taken. What action has BHA taken since receiving this directive?

Response: Staff are meeting regularly with EOHLC to address this and other issues and are available to meet with the RAB upon request. Staff expect significant improvement this fiscal year in this area for next PMR.

Comment: (Admissions) For CHAMP criterion 2b, Corrective Action asks that BHA ensure that all offers of housing were made using CHAMP for all units occupied in the fiscal year (excluding Administrative Transfers), and that data is accurately reported. What were BHA's failings that resulted in this Corrective Action, and what remedial steps have been taken since?

Response: FYE March 2024, we were in the midst of a transition period. We have been fully operational using CHAMP system since early 2024.

Comment: (Operations) The PMR Physical Conditions Report identified that five out of eight criteria mandated Corrective Action. In two of the remaining areas, while there were no findings, there were recommendations for BHA action. It was noted that no health or safety deficiencies were identified at the time of the EOHLC site visit.

Criteria 1 is for 100% of units to be inspected during the fiscal year. EOHLC mandated Corrective Action to ensure that units were inspected as per EOHLC guidance, that Inspection Reports were created for each inspection, that all deficiencies identified are in the inspection report (including tenant violations), that work orders are created, tracked, and completed for any defects identified in inspections, that staff were adequately trained on work order types and how to enter them, that all units are inspected, with related work orders identified as inspection-generated and completion within 30 days, and that BHA spread inspections out far enough to be able to complete work orders in those time frames (with ability to move to a deferred list if there is a need for a back-ordered part or other valid reason). Since BHA has revamped a number of its protocols recently on inspections and work orders, it should address

how it is carrying out this Corrective Action consistent with its revised protocols and technology.

Response: A number of the corrective actions have been addressed, and BHA continues to work with EOHLIC on meeting the state's maintenance requirements. EOHLIC provided training to BHA maintenance supervisors last quarter, and will meet with senior maintenance staff for additional PMR-specific follow-up during the month of January. The responsibility of inspections has been moved off site management staff and is now performed by a dedicated team of housing inspectors. Ten percent (10%) of units are inspected each month leaving two months of the fiscal year for any clean up of units with access issues or that had to be rescheduled.

Comment: (Operations) Criterion 2 is for Inspection Reports to create, track, and report work orders for inspection repairs, and for completion within 30 days (unless added to a deferred maintenance or capital improvement list, such as where a repair will require capital work). The EOHLIC Corrective Action is the same as listed under Criterion 1. See comment above.

Response: BHA staff will meet with EOHLIC staff on the maintenance portion of the PMR during the month of January for additional guidance and discussion on this portion of the PMR. BHA has upgraded inspection reports to provide additional detail in response to EOHLIC recommendations. See above response.

Comment: (Operations) Criterion 3 states that Unit Inspection Reports accurately reflect necessary repairs. EOHLIC's Corrective Action asks that whenever tenant violations are found in inspections, a Notice of Lease Violation be issued, and that these be resolved per EOHLIC guidance. It would be helpful to know what EOHLIC's guidance is on this. As with other Notices of Lease Violations, the first step would normally be a private conference, and it may be that the meeting with the tenant may identify other issues (for example, that the damage was the result of domestic violence for which the tenant should not be held liable, but there may need to be a transfer, lock change, or enforcement against the abuser, or that there is a hoarding issue and additional services may be needed). The tenant may claim that an item was not the result of tenant abuse or negligence, and should have the opportunity for a grievance to contest liability or the cost of repairs. There may be times where the tenant does not dispute liability but cannot pay damages immediately and the parties can work out a longer repayment period. Since an eviction for damages can have significant collateral consequences (denial of future housing, denial of shelter, etc.), it is important for the parties to explore alternatives that address the BHA's legitimate interests while avoiding homelessness.

Response: BHA staff will meet with EOHLIC staff on the maintenance portion of the PMR during the month of January for additional guidance and discussion on this portion of the PMR. Staff will solicit any best practices or EOHLIC guidance on this topic.

Comment: (Operations) Criterion 4 provides that work orders will be created for all vacancies and completed in 30 days (or a waiver requested). The Corrective Action includes making sure that all work required for vacancy turnover is recorded in the work order, that they are tracked,

and that there is a system of move-out inspections for all vacant units, with the work orders recording time spent on work, when work began and when it was finished, and a list of work done and materials listed. It also recommends that if work cannot be completed within the 30-day period, BHA staff should contact EOHLC Housing Management Specialist to see if the situation qualifies for a waiver (so that BHA can continue to receive funding for that unit pending completion). Here again, given that BHA has revised some of its protocols and methods of delivery, BHA should describe what steps it has taken to respond to this and what its current performance is.

Response: BHA took advantage of a system feature that auto creates work orders for unit turnover upon entry of a move out in Elite. Use of dedicated housing inspectors will create more uniformity in vacancy turnover work performed and tracked across the portfolio. Staff from BHA and EOHLC now meet on a monthly basis to discuss the status of vacancies and waiver requests for vacant units in the state program to ensure that all units that are eligible for waiver consideration, both family and elderly, are being tracked, reported and approved if waiver conditions are met. BHA staff will meet with EOHLC staff on the maintenance portion of the PMR during the month of January for additional guidance and discussion on this portion of the PMR.

Comment: (Operations) Criterion 5 says that Vacancy Work Orders must accurately reflect necessary repairs, and the Corrective Action recommendation overlaps with what's stated under Criterion 4, above. See prior comment.

Response: BHA staff will meet with EOHLC staff on the maintenance portion of the PMR during the month of January for additional guidance and discussion on this portion of the PMR. See previous response.

Comment: (Operations) Criterion 7 says that emergency work orders should be created, traced, reported and completed within 48 hours. While there is no Corrective Action or Operational Guidance listed here, the recommendations follow the criterion. BHA may be fine in this area, but if it is not, it should comment.

Response: Thank you for the comment.

Comment: (Operations) Criterion 8 says that requested work orders should be created, tracked and completed within 14 days or should be added to either the deferred maintenance or the Capital Improvement Program (CIP) list. Here again, there is no Corrective Action or Operational Guidance, but the recommendations track the criterion and also suggest considering tech solutions that can aid in generating and tracking work orders. Here again, BHA may want to say more given what it has rolled out for operations improvements and tech solutions for work orders. However, as noted both in these notes and in comments on the federal 5-year plan, BHA should set performance goals that are consistent with the 14-day period stated here as well as what is in state law.

Response: BHA staff will meet with EOHLC staff on the maintenance portion of the PMR during the month of January for additional guidance and discussion of deferred maintenance protocols.

#### Tenant Satisfaction Surveys, Chapter 200, Chapter 705 and Chapter 667 Programs

Comment: GBLS did comments on these surveys in prior state PHA Plans. It appears that Round 3 survey results were not included in the prior plans, but this does not break out which data came from which survey, or how the prior surveys changed as Round 3 data was added. Can BHA supply that, or would residents need to obtain this from EOHLC?

Response: The surveys are conducted by EOHLC.

Comment: The different pie charts were difficult to follow, since they were not identified (whether there were different ones for different time periods or different housing programs). Thus, while some charts showed a number of positive comparisons between BHA and other programs-- that resident feeling of being treated with courtesy and respect was significantly higher for BHA (81%) than for the average of large LHAs in Metro Boston (69%) or statewide (71%), that BHA did better on heating and water/plumbing issues and response time—other charts for similar indicators indicated that BHA did worse than the state average. BHA fared worse on reports of safety concerns, particularly with security entry doors and strangers hanging around. Overall resident satisfaction was better than the state average. It would help to break these charts out with labels—i.e., x chart was for y period, or was intended to cover the Chapter 200 program, and a later chart was intended for the Chapter 667 program.

Response: EOHLC designs the data presentation.