

Hampshire Cty. Reg. Hous. Authority Annual Plan for Fiscal Year 2021 For State-Aided Public Housing

The Annual Plan is a document compiled by housing authority staff in advance of each new fiscal year. The plan serves as both a tool for the Local Housing Authority (LHA) to reflect upon the prior fiscal year, and as an opportunity to develop a clear and transparent plan that builds on successes, identifies needs, and corrects any issues that have arisen in prior years. Additionally, the Annual Plan is an important tool for tenants, who may use the document to better understand the operations and needs of their housing authority, advocate for changes to policies and procedures, access data about the housing authority, and participate in their housing authority's governance.

In addition to the physical document, the Annual Plan is also a process of public engagement. Throughout the Annual Plan process, the LHA executive director or their designee will be expected to review the Plan with any Local Tenant Organizations (LTO's) and Resident Advisory Board (RAB) before the LHA presents the plan to the Board; make a draft available for review to all residents and the general public; post on the website and make a copy available to each LTO at least 30 business days before the public hearing; hold a hearing on the document; and collect, integrate, and report back on substantive comments. Additionally, the Local Housing Authority Board of Commissioners will read, offer recommendations, and approve the Annual Plan in advance of its submission to DHCD.

The law that mandates the Annual Plan is [An Act Relative to Local Housing Authorities, Massachusetts General Laws, Chapter 121B Section 28A](#). The regulation that expands upon Section 28A is [760 CMR 4.16](#). The regulations that address Local Tenant Organization (LTO) and resident participation in the Annual Plan are [760 CMR 6.09 \(3\)\(h\)](#) and [760 CMR 6.09\(4\)\(a\)\(4\)](#).

The Hampshire Cty. Reg. Hous. Authority's Annual Plan for their 2021 fiscal year includes the following components:

1. Overview and Certification
2. Capital Improvement Plan (CIP)
3. Maintenance and Repair Plan
4. Operating Budget
5. Narrative responses to Performance Management Review (PMR) findings
6. Policies
7. Waivers
8. Glossary
9. Other Elements
 - a. Local Tenants Organization (LTO) Letters
 - b. Public Comments and LHA Responses
 - c. Cover sheet for tenant satisfaction surveys
 - d. Tenant Satisfaction Survey - 667only
 - e. Performance Management Review

State-Aided Public Housing Developments

The following table identifies the state-aided public housing units with developments of more than 8 units listed separately. Units in developments of 8 or fewer units are aggregated as noted. Units that the LHA provides to assist clients of the Department of Mental Health (DMH), the Department of Developmental Services (DDS), or other agencies are also aggregated separately.

Dev No	Type	Development Name	Num Bldgs	Year Built	Dwelling Units
667-01	Elderly	HAMBLIN CT 667-01	4	1982	22
667-1A	Elderly	HILLSIDE TERRACE 667-1A	4	1982	14
	Family	Family units in smaller developments	3		6
Total			11		42

LHA Central Office

Hampshire Cty. Reg. Hous. Authority
37 Main St. #15, Cummington, MA, 01026
Susan Gregory, Executive Director
Phone: 413-634-5000
Email: hcrha@crocker.com

LHA Board of Commissioners

	<u>Role</u>	<u>Category</u>	<u>From</u>	<u>To</u>
Robert Baker	Member		04/26/2018	01/27/2023
Susan Bronstein	Vice-Chair		04/26/2018	01/27/2024
Denise LeDuc	Chair		06/20/2017	01/27/2022
Carolyn Urekew	Treasurer		04/24/2018	01/27/2022

Local Tenant Organizations and Resident Advisory Board

	<u>Date of Recognition by LHA</u>	<u>Date LHA Reviewed Draft AP with LTO</u>
Hillside Terrace Local Tenant Organiz	11/18/1991	08/20/2020

Plan History

The following required actions have taken place on the dates indicated.

REQUIREMENT	DATE COMPLETED
A. Advertise the public hearing on the LHA website.	07/21/2020
B. Advertise the public hearing in public postings.	08/03/2020
C. Notify all LTO's of the hearing and provide access to the Proposed Annual Plan.	08/13/2020
D. Post draft AP for tenant and public viewing.	08/13/2020
E. Hold quarterly meeting with LTO to review the draft AP. (Must occur before the LHA Board reviews the Annual Plan.)	08/20/2020
F. Annual Plan Hearing. Hosted by the LHA Board, with a quorum of members present.	09/30/2020
G. Executive Director presents the Annual Plan to the Board.	09/30/2020
H. Board votes to approve the AP.	09/30/2020

Certification

CERTIFICATION FOR SUBMISSION OF THE ANNUAL PLAN

I, Susan Gregory, Executive Director of the Hampshire Cty. Reg. Hous. Authority, certify on behalf of the Housing Authority that: a) the above actions all took place on the dates listed above; b) all facts and information contained in this Annual Plan are true, correct and complete to the best of my knowledge and belief and c) that the Annual Plan was prepared in accordance with and meets the requirements of the regulations at 760 CMR 4.16 and 6.09.

Date of certification: 10/09/2020

This Annual Plan (AP) will be reviewed by the Department of Housing and Community Development (DHCD) following the public comment period, the public hearing, and LHA Board approval.

Capital Improvement Plan (CIP)**Capital Improvement Plan****DHCD Description of CIPs:**

The Capital Improvement Plan (CIP) is a five year plan which identifies capital projects, provides a planning scope, schedule and budget for each capital project and identifies options for financing and implementing the plan. The CIP identifies anticipated spending for each Department of Housing and Community Development (DHCD) fiscal year (July 1 to June 30) based on the project schedules.

Local Housing Authorities (LHAs) receive yearly awards from DHCD (Formula Funding Awards) which they target to their most urgent capital needs in their CIP. They may also receive special awards from DHCD for specific projects which meet specific criteria. Special awards may be given for certain emergency, regulation compliance, energy and water conservation, and other projects. The first three years of the CIP are based on actual awards made to the LHA, while years four and five are based on estimated planning amounts, not actual awards.

LHAs may sometimes secure other sources of funding and assistance that you will note in their CIP, such as: Community Preservation Act (CPA) funding, Community Development Block Grant (CDBG) funding, Local Affordable Housing Trust Funds (AHTF), HOME grants, income from leasing a cell tower on their property, savings from net meter credit contracts with solar developers, utility rebates and contracted work from utility providers, and Sheriff's Department work crews. However, not all of these funding sources are available every year, or in all communities.

The CIP includes the following parts:

- A table of available funding sources and amounts
- A list of planned capital projects showing spending per fiscal year
- A table showing special awards and other funding for targeted projects, if any, which supplements Formula Funding awarded to the LHA
- A 'narrative' with a variety of additional information.

Capital Improvement Plan (CIP)**Aggregate Funding Available for Projects in the First Three Years of the CIP:**

Category of Funds	Allocation	Planned Spending	Description
Balance of Formula Funding (FF)	\$294,759.39		Total of all FF awards minus prior FF spending
LHA Emergency Reserve	\$29,475.94		Amount to reserve for emergencies
Net FF Funds (First 3 Years of the CIP)	\$265,283.45	\$235,218.97	Funds to plan & amount actually planned in the first 3 years of the CIP
ADA Set-aside	\$2,510.03	\$3,000.00	Accessibility projects
DMH Set-aside	\$0.00	\$0.00	Dept. of Mental Health facility
DDS Set-aside	\$0.00	\$0.00	Dept. of Developmental Services facility
Unrestricted Formula Funding (FF)	\$262,773.42	\$232,218.97	Funds awarded by DHCD to be used on projects selected by the LHA and approved by DHCD.
Special DHCD Funding	\$230,714.12	\$230,714.12	Targeted awards from DHCD
Community Development Block Grant (CDBG) Funds	\$0.00	\$0.00	Federal funds awarded by a city or town for specific projects.
Community Preservation Act (CPA) Funds	\$0.00	\$0.00	Community Preservation Act funds awarded by a city or town for specific projects.
Operating Reserve(OR) Funds	\$0.00	\$0.00	Funds from the LHA's operating budget.
Other Funds	\$53,825.00	\$53,825.00	Funds other than those in the above categories. See explanation below.
Total funds and planned spending	\$549,822.57	\$519,758.09	Total of all anticipated funding available for planned projects and the total of planned spending.

Capital Improvement Plan (CIP)**CIP Definitions:**

ADA Set-aside is funding allocated within the Formula Funding (FF) for use on projects that improve accessibility for people with disabilities. 10% of FF awards are designated for this purpose.

Available State Bond Funding is the amount of State Bond Funding available to the LHA for the first three years of the CIP. It is calculated by totaling all of FF and Special Awards granted to the LHA through the end of the third year of the plan and subtracting the amount of these funds spent prior to July 1 of the first year of the plan.

Amount spent prior to the plan is the total amount of Formula Funding (FF) and Special Awards spent prior to July 1 of the first year of the plan.

Capital project is a project that adds significant value to an asset or replaces building systems or components. Project cost must be greater than \$1000.

CDBG stands for Community Development Block Grant, a potential source of project funds.

CPA stands for Community Preservation Act, a potential source of project funds.

CapHub Project Number is the number given to projects entered into DHCD's project management system known as CapHub.

DMH Set-aside is funding allocated within the Formula Funding (FF) for use on facilities leased to the Department of Mental Health (DMH) program vendors, if any exist at this LHA.

DDS Set-aside is funding allocated within the Formula Funding (FF) for use on facilities leased to the Department of Developmental Services (DDS) program vendors, if any exist at this LHA.

Formula Funding (FF) is an allocation of state bond funds to each LHA according to the condition (needs) of its portfolio in comparison to the entire state-aided public housing portfolio.

Operating Reserve is an account, funded from the LHA operating budget, primarily used for unexpected operating costs, including certain extraordinary maintenance or capital projects.

Other Funds could include other funding by the city or town or from other sources.

Special Awards are DHCD awards targeted to specific projects. Award programs include funds for emergencies beyond what an LHA can fund, for complying with regulatory requirements, for projects that will save water or energy use, and various other programs the department may run from time to time.

Total Cost is the sum of investigation, design, administration, permitting, and construction costs for a project

Unrestricted Formula Funding (FF) is money awarded to the LHA by DHCD under the Formula Funding program other than amounts set aside (restricted) for accessibility improvements or for facilities operated by DMH or DDS.

Capital Improvement Plan (CIP)**Regional Capital Assistance Team**

Hampshire Cty. Reg. Hous. Authority participates in the Regional Capital Assistance Team (RCAT) program and project implementation responsibilities are as follows:

- o For projects with construction cost under \$10,000, the LHA has the sole responsibility to initiate, implement and manage the project. RCAT offers technical assistance upon request.

- o For projects with construction cost between \$10,000 and \$100,000 the RCAT will have lead responsibility to initiate, implement and manage the project with both DHCD and LHA involvement and oversight throughout the process. For projects in this range, the LHA will work with the RCAT Project Manager who will contact the LHA to initiate projects.

- o For projects with construction cost over \$100,000, or projects below that threshold that are complex or have a subsequent phase that exceeds \$100,000 construction cost, DHCD will take the lead and draft a WO or RFS to hire a designer to prepare plans and specs. RCAT will not be involved in the implementation of projects in this range and the LHA will continue to work directly with the DHCD Project Manager and DHCD design staff.

Capital Improvement Plan (CIP)

Formula Funding and Special DHCD Award Planned Spending - Other funding not included

Cap Hub Project Number	Project Name	Development(s)	Total Cost	Amount Spent Prior to Plan	fy2021 Spent	fy2021 Planned	fy2022	fy2023	fy2024	fy2025
360017	2008 FF Master CFA	HAMBLIN CT 667-01	\$957	\$957	\$0	\$0	\$0	\$0	\$0	\$0
360030	VU\$65K: Reoccupy 1 North St., South Hadley	North Street--South Hadley (Not Applicable)	\$552,511	\$309,696	\$155,456	\$242,816	\$0	\$0	\$0	\$0
360054	FF: DHW tank replacement - Hillside-ABCD Funding	HILLSIDE TERRACE 667-1A	\$10,670	\$0	\$0	\$0	\$0	\$0	\$0	\$0
360055	FF: VCT floors in second floor kitchens	HILLSIDE TERRACE 667-1A	\$5,207	\$0	\$2,154	\$5,207	\$0	\$0	\$0	\$0
360057	FF: Air exchanger port repair	HILLSIDE TERRACE 667-1A	\$4,339	\$624	\$0	\$3,715	\$0	\$0	\$0	\$0
360059	FF: Exterior Door Replacement	20 Pine Street, Huntington	\$6,696	\$0	\$0	\$6,696	\$0	\$0	\$0	\$0
360062	Sliding door replacement, Phase 2	HAMBLIN CT 667-01	\$80,538	\$6,200	\$0	\$74,338	\$0	\$0	\$0	\$0
360064	Boiler replacement by ABCD Funding	HILLSIDE TERRACE 667-1A	\$43,155	\$0	\$0	\$0	\$0	\$0	\$0	\$0
360065	Tree Removal	20 Pine Street, Huntington	\$6,235	\$4,000	\$0	\$2,235	\$0	\$0	\$0	\$0
360067	H&S FY20: install stair treads in stairwells		\$6,000	\$5,150	\$0	\$850	\$0	\$0	\$0	\$0
360068	H&S FY20: install exterior lighting		\$4,000	\$0	\$0	\$4,000	\$0	\$0	\$0	\$0

Capital Improvement Plan (CIP)

Formula Funding and Special DHCD Award Planned Spending - Other funding not included

Cap Hub Project Number	Project Name	Development(s)	Total Cost	Amount Spent Prior to Plan	fy2021 Spent	fy2021 Planned	fy2022	fy2023	fy2024	fy2025
360069	Hillside Terrace-office front entry concrete	HILLSIDE TERRACE 667-1A	\$2,593	\$0	\$0	\$2,593	\$0	\$0	\$0	\$0
360070	Hillside parking lot patch/crack repair	HILLSIDE TERRACE 667-1A	\$52,352	\$0	\$0	\$50,063	\$2,290	\$0	\$0	\$0
360071	Huntington 705, Unit 12E renovation	East Main Street Huntington 705-1A	\$8,465	\$0	\$0	\$8,465	\$0	\$0	\$0	\$0
360072	Huntington-12B East Street-renovation	East Main Street Huntington 705-1A	\$9,613	\$0	\$0	\$9,613	\$0	\$0	\$0	\$0
•	Hamblin Court-front entry lattice replacement	HAMBLIN CT 667-01	\$8,869	\$0	\$0	\$0	\$0	\$752	\$8,118	\$0
•	Hamblin Court-fencing-surround above ground propane tanks	HAMBLIN CT 667-01	\$5,751	\$0	\$0	\$0	\$0	\$5,751	\$0	\$0
•	Hamblin renovate unit	HAMBLIN CT 667-01	\$9,063	\$0	\$0	\$9,063	\$0	\$0	\$0	\$0
•	667-Hamblin Court renovate unit	HAMBLIN CT 667-01	\$9,514	\$0	\$0	\$0	\$0	\$6,031	\$3,484	\$0
•	Repave parking lot	HAMBLIN CT 667-01	\$70,625	\$0	\$0	\$0	\$0	\$0	\$19,920	\$50,706
•	Hillside sidewalk project	HILLSIDE TERRACE 667-1A	\$25,476	\$0	\$0	\$0	\$0	\$0	\$0	\$25,476

Capital Improvement Plan (CIP)

Formula Funding and Special DHCD Award Planned Spending - Other funding not included

Cap Hub Project Number	Project Name	Development(s)	Total Cost	Amount Spent Prior to Plan	fy2021 Spent	fy2021 Planned	fy2022	fy2023	fy2024	fy2025
•	Exterior painting 705-1A	East Main Street Huntington 705-1A	\$9,081	\$0	\$0	\$0	\$0	\$9,081	\$0	\$0
•	705-1A new driveway	East Main Street Huntington 705-1A	\$20,466	\$0	\$0	\$0	\$0	\$0	\$20,466	\$0
•	Walkway Repairs (Pine St)	Pine Street, Huntington 705-1C	\$10,948	\$0	\$0	\$10,948	\$0	\$0	\$0	\$0
•	20 Pine Str-general site landscaping/lot clearing	Pine Street, Huntington 705-1C	\$14,738	\$0	\$0	\$0	\$0	\$0	\$14,738	\$0
•	20 Pine Str-repair front patio	Pine Street, Huntington 705-1C	\$7,430	\$0	\$0	\$0	\$0	\$7,430	\$0	\$0
TOTALS			\$985,289	\$326,626	\$157,610	\$430,599	\$2,290	\$29,045	\$66,725	\$76,182

Capital Improvement Plan (CIP)

FUNDS IN ADDITION TO ANNUAL FORMULA FUNDING AWARD

Cap Hub Project Number	Project Name	DHCD Special Award Comment	Special DHCD Awards				Other Funding			
			Emergency Reserve	Compliance Reserve	Sustain-ability	Special Awards	CDBG	CPA	Operating Reserve	Other Funds
360030	VU\$65K: Reoccupy 1 North St., South Hadley	2 vacan unit rehab	\$0	\$487,511	\$0	\$4,555	\$0	\$0	\$0	\$0
360054	FF: DHW tank replacement - Hillside-ABCD Funding		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$10,670
360064	Boiler replacement by ABCD Funding		\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$43,155
360067	H&S FY20: install stair treads in stairwells	H&S FY20: install stair treads in stairwells	\$0	\$0	\$0	\$6,000	\$0	\$0	\$0	\$0
360068	H&S FY20: install exterior lighting	H&S FY20: install exterior lighting	\$0	\$0	\$0	\$4,000	\$0	\$0	\$0	\$0
360072	Huntington-12B East Street-renovation		\$0	\$0	\$0	\$9,613	\$0	\$0	\$0	\$0
TOTALS			\$0	\$487,511	\$0	\$24,168	\$0	\$0	\$0	\$53,825

Capital Improvement Plan (CIP) Narrative

Including Requests to DHCD & Supporting Statements

1. Request for increased spending flexibility.

DHCD designates a spending target (cap share) and an allowable spending range for each year of the CIP. A Housing Authority may request to shift the cap shares of the first three years in order to increase scheduling flexibility. A CIP utilizing this flexibility is called an Alternate CIP. The total spending over three years and over five years must continue to meet the limits set by DHCD. DHCD will approve an Alternate CIP only with acceptable justification and only if funding is available.

Hampshire Cty. Reg. Hous. Authority has not submitted an Alternate CIP.

2. Request for additional funding.

A Housing Authority may request additional funding from DHCD for projects that qualify as emergencies, required legal compliance upgrades, or sustainability improvements.

Hampshire Cty. Reg. Hous. Authority has not requested additional funding.

3. Overall goals of the Housing Authority's CIP

Our goals are always to provide a safe place to live and to do this we have many outdoor projects such as tree removal, paving projects and sidewalk repairs. Interior projects are completed typically by maintenance staff at the time of turnover. However, the process has been slower due to Covid-19 precautions and guidelines that need to be adhered to.

4. Changes from the Housing Authority's previous CIP

Every new CIP differs from the previous CIP because projects have been completed and a new year has been added with new projects. These changes and other significant changes to the content of the CIP are highlighted below:

Projects through the year have been added to Hillside and Hamblin Court. Projects have been mainly exterior projects due to the Covid-19 guidelines.

5. Requirements of previous CIP approval

There were no special conditions attached to the approval of our previous CIP.

6. Quarterly capital reports

Our most recent quarterly capital report (form 80 and 90) was submitted on 07/09/2020.

7. Capital Planning System (CPS) updates

Our CPS facility data has been updated with current condition information, including changes resulting from projects completed in the past year, as of 07/15/2020.

8. Project priorities

All the projects in our CIP are high priority (Priority 1 and 2 projects).

9. High priority deficiencies

We have included all of our high priority (CPS priority 1 and 2) projects in our CIP.

10. Accessibility

We are not aware of any accessibility deficiencies in our portfolio.

11. Special needs development

Hampshire Cty. Reg. Hous. Authority does not have a special needs (167 or 689 programs) development.

12. Energy and water consumption

Our 12 most recent monthly energy reports are for months 8/2019 to 7/2020.

The following table lists the DHCD thresholds for Per Unit Monthly (PUM) expense for electricity, natural gas, oil, and water use and the developments at the Housing Authority that have expenses in excess of the thresholds, if any.

	Electric PUM > Threshold	Gas PUM > Threshold	Oil PUM > Threshold	Water PUM > Threshold
Threshold PUM:	\$100	\$80	\$50	\$60

No developments exceed threshold values.

13. Energy or water saving initiatives

Hampshire Cty. Reg. Hous. Authority is not currently pursuing any energy or water-saving audits or grants that could affect CIP project scope, costs or timing of projects.

14. Vacancy rate

Our unadjusted vacancy rate reported to DHCD is as follows. (The unadjusted vacancy rate captured in these figures is the percentage of ALL housing units that are vacant, including both offline units being used for other purposes and units with DHCD vacancy waivers.)

2.8% c. 667 (DHCD Goal 2%)

0% c. 200 (DHCD Goal 2%)

50% c. 705 (DHCD Goal 2%)

Hampshire Cty. Reg. Hous. Authority will address the excess vacancies in the following manner:

The tenants housed in the 705 units have been in the unit(s) for a very long time. When the units became vacant they needed a lot of renovation which required outside contractor assistance and capital plan revisions. The process has been unusually slow due to the Covid-19 precautions. The goal is to move quicker on the vacates and get them leased in a timely fashion.

15. Vacancies

Hampshire Cty. Reg. Hous. Authority has no units listed as vacant, proposed to be vacant, or at risk of becoming vacant.

Maintenance and Repair Plan

Maintenance Objective

The goal of good property maintenance at a public housing authority is to serve the residents by assuring that the homes in which they live are decent, safe, and sanitary.

About This Maintenance and Repair Plan

This Maintenance & Repair Plan consists of several subsections describing maintenance systems followed by charts showing typical preventive maintenance, routine maintenance, and unit inspection tasks and schedules. These subsections are:

- a. **Classification and Prioritization of Maintenance Tasks** - Defines and prioritizes types of work to be accomplished by maintenance staff and vendors. Explains how the housing authority is expected to respond to work orders (tasks or requests) based on the work order classification.
- b. **Emergency Response System** - Defines what constitutes an emergency and how to notify staff of an emergency.
- c. **Normal Maintenance Response System** - How to contact the maintenance staff for a non-emergency request.
- d. **Work Order Management** - Description of the housing authority's system for managing work orders (tasks and requests).
- e. **Maintenance Plan Narrative & Policy Statement** - Self-assessment, basic information, and goals for the coming year, along with a description of the housing authority's maintenance program.
- f. **Preventive Maintenance Schedule** - A listing and schedule of tasks designed to keep systems and equipment operating properly, to extend the life these systems and equipment, and to avoid unexpected breakdowns.
- g. **Routine Maintenance Schedule** - A listing and schedule of ordinary maintenance tasks such as mopping, mowing, raking, and trash collection required to keep the facilities in good condition.
- h. **Unit Inspections** - Scheduling of annual unit inspections.

Classification and Prioritization of Maintenance Tasks

Maintenance items are tracked as “work orders” and are classified in the following categories. They are prioritized in the order listed. The following classifications and prioritization are required by the Department of Housing and Community Development (DHCD).

- I. **Emergencies** - Emergencies are only those conditions which are **immediately threatening** to the life or safety of our residents, staff, or structures.
 - **Goal: initiated with 24 to 48 hours.**
- II. **Vacancy Refurbishment - Work necessary to make empty units ready for new tenants.**
 - After emergencies, the refurbishment of vacancies for immediate re-occupancy has the highest priority for staff assignments. **Everyday a unit is vacant is a day of lost rent.**
 - **Goal: vacancy work orders are completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver.**
- III. **Preventive Maintenance** - Work which must be done to **preserve and extend the useful life** of various elements of your physical property and avoid emergency situations.
 - A thorough Preventive Maintenance Program and Schedule that deals with all elements of the physical property is provided later in the document.
 - The Preventive Maintenance Program is reviewed and updated annually and as new systems and facilities are installed.
- IV. **Programmed Maintenance** - Work which is important and is completed to the greatest extent possible within time and budget constraints. Programmed maintenance is grouped and scheduled to make its completion as efficient as possible. Sources of programmed maintenance include:
 - Routine Work includes those tasks that need to be done on a regular basis to keep our physical property in good shape. (Mopping, Mowing, Raking, Trash, etc.)
 - Inspections are the other source of programmed maintenance.
 - o Inspections are visual and operational examinations of parts of our property to determine their condition.
 - o All dwelling units, buildings and sites must be inspected at least annually.
 - o **Goal: Inspection-generated work orders are 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 the Capital Improvement Plan in the case of qualifying capital repairs (unless health/safety issue).**
- V. **Requested Maintenance** - Work which is requested by residents or others, does not fall into any category above, and should be accomplished as time and funds are available.
 - Requests from residents or others for maintenance work which does not fall into one of the other categories has the lowest priority for staff assignment.
 - **Goal: Requested work orders are completed in 14 calendar days from the date of tenant request or if not completed within that timeframe (and not a health or safety issue), the task is added and completed in a timely manner as a part of the Deferred Maintenance Plan and/or CIP.**

Emergency Request System

For emergency requests call the numbers listed here. Qualifying emergency work requests are listed below.

METHOD	CONTACT INFO.	TIMES
Call LHA at Phone Number	413-634-5000	T (10-4pm) , W (12:30-4:30pm), TH (1
Other	Maintenance numbers:	413-522-7971 (Huntington) or 413-634-

Because Hampshire County Regional Housing Authority spans multiple towns, we have separate phone numbers for each town. 413-522-7971 (Huntington) or 413-634-8067 (Cummington)

List of Emergencies - Emergencies are those conditions which are immediately threatening to the life or safety of our residents, staff, or structures. The following is a list of typical conditions that warrant an emergency response. If there is an emergency condition whether or not enumerated on this list please notify the office or answering service at the numbers listed above. If you have any questions regarding this list or other matters that may constitute an emergency, please contact the Hampshire Cty. Reg. Hous. Authority main office.

QUALIFYING EMERGENCY WORK REQUESTS
Fires of any kind (Call 911)
Gas leaks/ Gas odor (Call 911)
No electric power in unit
Electrical hazards, sparking outlets
Broken water pipes, flood
No water/ unsafe water
Sewer or toilet blockage
Roof leak
Lock outs
Door or window lock failure
No heat
No hot water
Snow or ice hazard condition
Dangerous structural defects
Inoperable smoke/CO detectors, beeping or chirping

Normal Maintenance Request Process

Make normal (non-emergency) maintenance requests using the following methods:

METHOD	CONTACT INFO.	TIMES
Text Phone Number		
Call Answering Service		
Call Housing Authority Office	413-634-5000	T (10-4pm) , W (12:30-4:30pm), TH
Submit Online at Website		
Email to Following Email		
Other	Maintenance numbers:	413-522-7971 (Huntington) or

Because Hampshire County Regional Housing Authority spans multiple towns, we have separate phone numbers for each town. 413-522-7971 (Huntington) or 413-634-8067 (Cumminaton)

Work Order Management

A. DHCD review of this housing authority’s operations shows that the authority uses the following system for tracking work orders:

Type of work order system: DHCD's usual on-site review for this housing authority's work order system was cancelled due to the COVID-19 emergency.

Work order classification used:

Emergency	
Vacancy	
Preventative Maintenance	
Routine	
Inspections	
Tenant Requests	

B. We also track deferred maintenance tasks in our work order system.

C. Our work order process includes the following steps:

Step	Description	Checked steps are used by LHA
1	Maintenance Request taken/submitted per the standard procedures listed above for the Emergency Request System and the Normal Maintenance Request Process.	<input checked="" type="checkbox"/>
2	Maintenance Requests logged into the work system	<input checked="" type="checkbox"/>
3	Work Orders generated	<input checked="" type="checkbox"/>
4	Work Orders assigned	<input checked="" type="checkbox"/>
5	Work Orders tracked	<input checked="" type="checkbox"/>
6	Work Orders completed/closed out	<input checked="" type="checkbox"/>
7	Maintenance Reports or Lists generated	<input checked="" type="checkbox"/>

D. Additional comments by the LHA regarding work order management:

We use PHA Network for work orders of all kinds.

Maintenance Plan Narrative

Following are Hampshire Cty. Reg. Hous. Authority’s answers to questions posed by DHCD.

A. Narrative Question #1: How would you assess your Maintenance Operations based on feedback you’ve received from staff, tenants, DHCD’s Performance Management Review (PMR) & Agreed Upon Procedures (AUP), and any other sources?

In my assessment, maintenance operations runs well. There are no noted complaints from tenants regarding work orders. Staff have had to become familiar with the work order system in PHA Network .

Due to the Pandemic unit inspections have been on hold except emergency work orders.

B. Narrative Question #2: What changes have you made to maintenance operations in the past year?

The HCRHA has made good progress in recording work orders, deferred maintenance and preventative maintenance in the PHA Network System. HCRHA has units in two separate towns. Both locations has the ability to input work orders which it did not in the past.

C. Narrative Question #3: What are your maintenance goals for this coming year?

The 2018 PMR facilities management assessment noted that HCRHA should continue to learn the full capability of the PHA Network work order system. This is the goal. Due to COVID-19 the PMR Facilities Management review has been placed on hold.

D. Maintenance Budget Summary

The budget numbers shown below are for the consolidated budget only. They do not include values from supplemental budgets, if any.

	Total Regular Maintenance Budget	Extraordinary Maintenance Budget
Last Fiscal Year Budget	\$83,441.00	\$10,000.00
Last Fiscal Year Actual Spending	\$82,266.00	\$10,228.00
Current Fiscal Year Budget	\$83,088.00	\$18,400.00

E. Unit Turnover Summary

# Turnovers Last Fiscal Year	2
Average time from date vacated to make Unit "Maintenance Ready"	110 days
Average time from date vacated to lease up of unit	131 days

F. Anything else to say regarding the Maintenance Plan Narrative?

none

Attachments

These items have been prepared by the Hampshire Cty. Reg. Hous. Authority and appear on the following pages:

Preventive Maintenance Schedule - a table of preventive maintenance items showing specific tasks, who is responsible (staff or vendor), and the month(s) they are scheduled

Deferred Maintenance Schedule - a table of maintenance items which have been deferred due to lack of resources.

Preventative Maintenance Schedule HCRHA

(HT = Hillside Terrace, HCT = Hamblin Court, 705's are broken down by street#)

1	Check and maintain Snowblower, pre season	Lawn mowing, trimming and clean up	Preventative Maintenance	General
2	check and maintain leafblower preseason	Lawn mowing, trimming and clean up	Preventative Maintenance	General
3	Clean out gutters before winter.	Siding/Roofs/Gutters	Preventative Maintenance	General
4	Remove leaves / sticks from grounds before winter.	Lawn mowing, trimming and clean up	Scheduled	General
5	Wash down vinyl siding on all buildings every OTHER year.	Siding/Roofs/Gutters	Scheduled	General
6	Trim hedges / hostas / lillies, as needed in preparation for winter.	Lawn mowing, trimming and clean up	Scheduled	General
7	Bring in all movable outdoor furniture, etc. Remove hoses, and cover outside spigots, in preparation for winter.	Lawn mowing, trimming and clean up	Scheduled	General
8	Have Septic tank pumped out every fall.	Miscellaneous	Preventative Maintenance	General
9	Check all smoke and CO detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
10	Check all CO and smoke detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
11	Spring grounds clean up (after the snow piles melt).	Lawn mowing, trimming and clean up	Scheduled	General
12	Annual Boiler Service / Maintenance.	Furnaces, heating units	Preventative Maintenance	General
13	Check all smoke and CO detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
14	Check and maintain leafblower pre-season.	Lawn mowing, trimming and clean up	Preventative Maintenance	General
15	Check all CO and smoke detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
16	Check all CO and smoke detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General

17	Check all CO and smoke detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
18	Check all CO and smoke detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
19	Check all CO and smoke detectors on premises.	Fire/Smoke detectors, Extinguishers, Hydrants	Preventative Maintenance	General
20	Wash down vinyl siding on all buildings every OTHER year.	Siding/Roofs/Gutters	Scheduled	General
21	Check and maintain snowblower, pre-season.	Lawn mowing, trimming and clean up	Preventative Maintenance	General
22	Clean out gutters before winter.	Siding/Roofs/Gutters	Preventative Maintenance	General
23	Remove leaves / sticks from ground before winter. Trim greenery as needed.	Lawn mowing, trimming and clean up	Scheduled	General
24	Bring in any movable outdoor furniture, etc. Remove hoses, winterize outdoor spigots, in preparation for winter.	Lawn mowing, trimming and clean up	Scheduled	General
25	Annual Boiler Service / Maintenance.	Furnaces, heating units	Preventative Maintenance	General
26	Annual Boiler Service / Maintenance.	Furnaces, heating units	Preventative Maintenance	General
27	Annual Boiler Service / Maintenance.	Furnaces, heating units	Preventative Maintenance	General

1	shed	HT	BLDGA		Annually	10/1/2020	Yes
2	shed	HT	BLDGA		Annually	9/3/2020	Yes
3	grounds	HT	BLDGA		Annually	10/15/2020	Yes
4	grounds	HT	BLDGA		Annually	11/12/2020	Yes
5	Grounds	HT	BLDGA		Every (nn) days	9/22/2021	Yes
6	grounds	HT	BLDGA		Annually	11/4/2020	Yes
7	grounds	HT	BLDGA		Annually	11/5/2020	Yes
8	Grounds	HT	BLDGA		Annually	10/1/2020	Yes
9	All buildings on site	HT	BLDGA		Annually	11/5/2020	Yes
10	All buildings on site	HT	BLDGA		Annually	3/10/2020	Yes
11	grounds	HT	BLDGA		Annually	4/1/2020	Yes
12	all bldgs.	HT	BLDGA		Annually	9/3/2020	Yes
13	All buildings on site	HCT	BLDG1		Annually	3/10/2020	Yes
14	grounds	HCT	BLDG1		Annually	9/3/2020	Yes
15	All buildings on site	HCT	BLDG1		Annually	11/5/2020	Yes
16	interior of both units	705-12E	12E		Annually	11/5/2020	Yes

17	interior of both units	705-12E	12E		Annually	3/10/2020	Yes
18	interior of both units	705-20P	20P		Annually	11/5/2020	Yes
19	interior of both units	705-12E	20P		Annually	3/10/2020	Yes
20	grounds	HCT	BLDG1		Every (nn) days	9/23/2021	Yes
21	grounds	HCT	BLDG1		Annually	10/1/2020	Yes
22	All buildings on site	HCT	BLDG1		Annually	10/15/2020	Yes
23	grounds	HCT	BLDG1		Annually	11/5/2020	Yes
24	grounds	HCT	BLDG1		Annually	11/5/2020	Yes
25	All buildings on site	HCT	BLDG1		Annually	9/3/2020	Yes
26	duplex	705-12E	BLDG1		Annually	9/3/2020	Yes
27	duplex	705-20P	20P		Annually	9/3/2020	Yes

Date Entered	Item Description	Reason Deferred	Est. completion	Cost Estimate	Materials Needed	Estimated Hours	Other Comments:
4/24/2019	sidewalk replacement HT	Create CIP in CPS	10/1/2019	\$ 3,500	concrete replacing asphalt	8	Not completed
8/7/2019	Install stair treads HT, H.Ct	CIP created for 2020	6/25/2020	\$ 5,150	Treads glue	8	completed
Oct. 2019	Walls need repair and paint 1-G H.Ct	unit occupied	upon vacancy	\$ 2,000	paint, spackle, primer	40	
Dec-19	Window rep. repair 705 12 E.Main B	unit occupied winter	spring 2020	\$ 500	window frame, sash	3	
Jan-20	unit rehab 705	Tenant moving in 2/2020	Summer 2020	\$ 9,000	walls, floors, bathroom rep	4 weeks	in progress 8/2020 CIP created
1-Nov-19	Unit reah 705 12 Emain Unit A	Vacancy Need CIP	2/1/2020	\$ 6,000	paint, spackle primer, carpeting	4 weeks	completed
Oct. 2019	Repalce roof shingles HT Shed	Season	Summer 2020	\$ 1,000	roofing materials	1 week	pending
Oct-19	Paint kiosks at HT	Season	spring 2020	\$ 300	paint	2weeks	completed
4/10/2019	Wall Repair	unit occupied	upon vacancy	\$ 2,000	paint supplies	2 weeks	
11/7/2019	Replace flooring	unit occupied	upon vacancy	\$ 2,000	flooring	1 week	
12/10/2019	Replace flooring in patio and Bath	unit is occupied- winter	spring 2020	\$ 2,000		2 weeks	completed Feb 2020
Oct. 2019	Exterior Paintng HT	season	spring 2020	\$ 500	paint supplies	2weeks	Apr-20
Apr-19	Parking lot lines and signs	Weather	8/1/2019	\$ 500		2 weeks	Completed 8/2019
Jan-19	Loose soffet over boiler room HT	Season	5/1/2019	N/N		2hours	completed 5/ 2019
Apr-19	paint Hallways HT	weather	4/1/2020			on going	spring 2020
Apr-19	Flooring , Paint H.Ct 1-l	unit occupied	upon vacancy	\$ 2,500		1week	
Nov-19	Rep Bathroom flooring	winter	Spring 2020	\$ 2,500		1week	Completed Jan 2020

Operating Budget

The tables on the following pages show the approved budget and actual income and spending per budget account (row) for the fiscal year ending 12/31/2019. It also shows the approved budget for the current year (2020) if there is one, and the percent change from last year's spending to this year's approved budget. The final column shows the current approved amount for each account divided by the number of housing units and by 12 months to show the amount per unit per month (PUM). The chart does not show a draft budget for the coming fiscal year as that will typically be developed in the final month of the fiscal year.

The budget format and accounts are mandated by the Department of Housing and Community Development (DHCD). For a better understanding of the accounts and discussion of special situations see the notes following the budget tables and the "Definitions of Accounts" at the end of this section.

The LHA maintains a consolidated budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by the LHA. It does not maintain separate budgets for each development.

LHA Comments

We anticipate a potential need to submit a revision to our budget to reflect the added costs due to COVID-19.

Operating Reserve

The LHA's operating reserve is the amount of funds that an LHA sets aside to sustain itself during lean years, or to remedy urgent health and safety concern or address deferred maintenance items. In addition, while DHCD approves a fixed non-utility operating budget level for every LHA (called the Allowable Non-Utility Expense Level, or ANUEL), LHAs can propose a budget that exceeds that level, with the additional cost to be funded from the Operating Reserve, as long as the reserve will still remain above the minimum threshold set by DHCD.

DHCD defines a full (100%) Operating Reserve (OR) amount to be equal to one-half of the previous year's operating expenses and requires LHAs to maintain a minimum OR of 35% of this amount to cover any unplanned but urgent needs that may arise during the year and that can't be funded by the operating budget. If the reserve is between 20% and 35% of the full level, the LHA must obtain prior written approval from DHCD to spend reserve funds, unless the expense is to resolve a health and safety issue. If the reserve is below the 20% level, the LHA can only spend OR funds on health and safety issues. In both cases, the LHA should address the health and safety issue immediately but must retroactively inform DHCD and obtain its approval.

The Hampshire Cty. Reg. Hous. Authority operating reserve at the end of fiscal year 2019 was \$87,080.00, which is 68.3% of the full reserve amount defined above.

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Hampshire Cty. Reg. Hous. Authority.						
REVENUE						
Account Number	Account Class	2019 Approved Revenue Budget	2019 Actual Amounts Received	2020 Approved Revenue Budget	% Change from 2019 Actual to 2020 Budget	2020 Dollars Budgeted per Unit per Month
3110	Shelter Rent - Tenants	\$177,500.00	\$175,761.00	\$179,500.00	2.1%	\$356.15
3111	Shelter Rent - Tenants - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
3115	Shelter Rent - Federal Section 8	\$0.00	\$0.00	\$0.00	0%	\$0.00
3190	Nondwelling Rentals	\$0.00	\$0.00	\$0.00	0%	\$0.00
3400	Administrative Fee - MRVP	\$0.00	\$0.00	\$0.00	0%	\$0.00
3610	Interest on Investments - Unrestricted	\$240.00	\$246.00	\$240.00	-2.4%	\$0.48
3611	Interest on Investments - Restricted	\$0.00	\$0.00	\$0.00	0%	\$0.00
3690	Other Revenue	\$1,400.00	\$1,268.00	\$1,400.00	10.4%	\$2.78
3691	Other Revenue - Retained	\$50.00	\$1,104.00	\$350.00	-68.3%	\$0.69
3692	Other Revenue - Operating Reserves	\$0.00	\$0.00	\$0.00	0%	\$0.00
3693	Other Revenue - Energy Net Meter	\$0.00	\$0.00	\$0.00	0%	\$0.00
3801	Operating Subsidy - DHCD (4001)	\$70,975.00	\$74,389.00	\$98,780.00	32.8%	\$195.99
3802	Operating Subsidy - MRVP Landlords	\$0.00	\$0.00	\$0.00	0%	\$0.00
3803	Restricted Grants Received	\$0.00	\$0.00	\$0.00	0%	\$0.00
3920	Gain/Loss From Sale/Disp. of Prop.	\$0.00	\$0.00	\$0.00	0%	\$0.00
3000	TOTAL REVENUE	\$250,165.00	\$252,768.00	\$280,270.00	10.9%	\$556.09

**Annual Plan 2021
Annual Operating Budget**

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Hampshire Cty. Reg. Hous. Authority.						
EXPENSES						
Account Number	Account Class	2019 Approved Expense Budget	2019 Actual Amounts Spent	2020 Approved Expense Budget	% Change from 2019 Actual to 2020 Budget.	2020 Dollars Budgeted per Unit per Month
4110	Administrative Salaries	\$39,117.00	\$37,184.00	\$40,199.00	8.1%	\$79.76
4120	Compensated Absences	\$0.00	\$0.00	\$0.00	0%	\$0.00
4130	Legal	\$500.00	\$0.00	\$500.00	100%	\$0.99
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4150	Travel & Related Expenses	\$2,050.00	\$2,043.00	\$2,050.00	0.3%	\$4.07
4170	Accounting Services	\$6,000.00	\$6,000.00	\$6,180.00	3%	\$12.26
4171	Audit Costs	\$3,600.00	\$3,600.00	\$3,150.00	-12.5%	\$6.25
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.00
4190	Administrative Other	\$8,780.00	\$8,608.00	\$11,280.00	31%	\$22.38
4191	Tenant Organization	\$500.00	\$250.00	\$500.00	100%	\$0.99
4100	TOTAL ADMINISTRATION	\$60,547.00	\$57,685.00	\$63,859.00	10.7%	\$126.70
4310	Water	\$18,500.00	\$17,308.00	\$18,500.00	6.9%	\$36.71
4320	Electricity	\$29,700.00	\$30,569.00	\$29,700.00	-2.8%	\$58.93
4330	Gas	\$32,175.00	\$34,152.00	\$32,175.00	-5.8%	\$63.84
4340	Fuel	\$115.00	\$271.00	\$115.00	-57.6%	\$0.23
4360	Energy Conservation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4390	Other	\$1,300.00	\$1,040.00	\$1,300.00	25%	\$2.58
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.00
4392	Net Meter Utility Credit (Negative Amount)	\$0.00	\$0.00	\$0.00	0%	\$0.00
4300	TOTAL UTILITIES	\$81,790.00	\$83,340.00	\$81,790.00	-1.9%	\$162.28

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Hampshire Cty. Reg. Hous. Authority.						
EXPENSES						
Account Number	Account Class	2019 Approved Expense Budget	2019 Actual Amounts Spent	2020 Approved Expense Budget	% Change from 2019 Actual to 2020 Budget	2020 Dollars Budgeted per Unit per Month
4410	Maintenance Labor	\$29,288.00	\$28,245.00	\$34,288.00	21.4%	\$68.03
4420	Materials & Supplies	\$7,000.00	\$7,048.00	\$11,300.00	60.3%	\$22.42
4430	Contract Costs	\$47,153.00	\$46,973.00	\$37,500.00	-20.2%	\$74.40
4400	TOTAL MAINTENANCE	\$83,441.00	\$82,266.00	\$83,088.00	1%	\$164.86
4510	Insurance	\$9,275.00	\$7,365.00	\$9,500.00	29%	\$18.85
4520	Payment in Lieu of Taxes	\$1,200.00	\$1,200.00	\$1,200.00	0%	\$2.38
4540	Employee Benefits	\$13,912.00	\$13,060.00	\$15,854.00	21.4%	\$31.46
4541	Employee Benefits - GASB 45	\$0.00	\$8,009.00	\$0.00	-100%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$-9,246.00	\$0.00	-100%	\$0.00
4570	Collection Loss	\$0.00	\$0.00	\$300.00	100%	\$0.60
4571	Collection Loss - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
4580	Interest Expense	\$0.00	\$0.00	\$0.00	0%	\$0.00
4590	Other General Expense	\$0.00	\$0.00	\$0.00	0%	\$0.00
4500	TOTAL GENERAL EXPENSES	\$24,387.00	\$20,388.00	\$26,854.00	31.7%	\$53.28
4610	Extraordinary Maintenance	\$10,000.00	\$10,228.00	\$18,400.00	79.9%	\$36.51
4611	Equipment Purchases - Non Capitalized	\$0.00	\$0.00	\$10,000.00	100%	\$19.84
4612	Restricted Reserve Expenditures	\$0.00	\$0.00	\$0.00	0%	\$0.00
4715	Housing Assistance Payments	\$0.00	\$0.00	\$0.00	0%	\$0.00
4801	Depreciation Expense	\$0.00	\$81,354.00	\$0.00	-100%	\$0.00
4600	TOTAL OTHER EXPENSES	\$10,000.00	\$91,582.00	\$28,400.00	-69%	\$56.35
4000	TOTAL EXPENSES	\$260,165.00	\$335,261.00	\$283,991.00	-15.3%	\$563.47

**Annual Plan 2021
Annual Operating Budget**

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Hampshire Cty. Reg. Hous. Authority.						
SUMMARY						
Account Number	Account Class	2019 Approved Budget	2019 Actual Amounts	2020 Approved Budget	% Change from 2019 Actual to 2020 Budget	2020 Dollars Budgeted per Unit per Month
3000	TOTAL REVENUE	\$250,165.00	\$252,768.00	\$280,270.00	10.9%	\$556.09
4000	TOTAL EXPENSES	\$260,165.00	\$335,261.00	\$283,991.00	-15.3%	\$563.47
2700	NET INCOME (DEFICIT)	\$-10,000.00	\$-82,493.00	\$-3,721.00	-95.5%	\$-7.38
7520	Replacements of Equip. - Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00
7540	Betterments & Additions - Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00
7500	TOTAL NONOPERATING EXPENDITURES	\$0.00	\$0.00	\$0.00	0%	\$0.00
7600	EXCESS REVENUE OVER EXPENSES	\$-10,000.00	\$-82,493.00	\$-3,721.00	-95.5%	\$-7.38

Explanation of Budget Accounts

The following explains how each of the line items is to be prepared.

3110: Shelter Rent: The shelter rent projection should be based on the current rent roll plus anticipated changes expected from annual rent re-determinations or as a result of regulatory amendments.

3111: Shelter Rent – Tenants - Fraud/Retroactive: This account should be used for the reporting of total rent receipts from residents due to unreported income. These are often called fraud or retroactive balances. In cases where deficit LHAs discover, pursue cases, and have entered into a written fraud/retroactive re-payment agreement **with a present or former tenant who did not report income**, the LHA will be allowed to retain two-thirds of the funds recovered. One third of the total dollar amount recovered should be included in the LHA's quarterly or year-end Operating Statement as Shelter Rent, account #3111, and two-thirds of this total dollar amount should be included in Other Revenue-Retained, account #3691.

3115: Shelter Rent - Section 8: This account applies only to those developments receiving support through the federal government's Housing and Urban Development (HUD) Section 8 New Construction and/or Substantial Rehab Programs.

3190: Non-Dwelling Rental: This account should be credited with the rents, other than tenants rents reported in line 3110 and 3115, including charges for utilities and equipment, billed to lessees of non-dwelling facilities as well as apartments rented for non-dwelling purposes, such as social service programs.

3400: Administrative Fee- MRVP/AHVP: This account should be credited with Administrative Fees to be received for the MRVP/AHVP Program. The MRVP/AHVP administrative fee is \$40.00 per unit per month, as of July 1, 2019.

3610: Interest on Investments – Unrestricted: This account should be credited with interest earned on unrestricted administrative fund investments.

3611: Interest on Investments – Restricted: This account should be credited with interest earned on restricted administrative fund investments. For example, an LHA may receive a grant whose use is restricted to a specific purpose, and the interest income earned on that grant may also be restricted to the same purpose.

3690: Other Operating Revenues: This account should be credited with income from the operation of the project that cannot be otherwise classified. Income credits to this account include, but are not limited to, penalties for delinquent payments, rental of equipment, charges for use of community space, charges to other projects or programs for the use of central office management and maintenance space, commissions and profits from vending machines, including washing machines, and certain charges to residents for additional services, materials, and/or repairs of damage caused by neglect or abuse in accordance with the Department's regulations on lease provisions..

3691: Other Revenue – Retained: This account should be credited with certain miscellaneous revenue to be retained by the LHA, and which is not used to reduce the amount of operating subsidy the LHA is due. The most common examples for this account is receipts for the rental of roof antennas to cell phone providers and net meter credits earned on electricity bills from Net Meter Power Purchase Agreements (PPA's). Generally, surplus LHAs may retain 100% of these savings and deficit LHAs may retain 25% of the savings, with

the 75% balance used to offset its need for operating subsidy. However, for the period 7/1/16 through 6/30/19, all deficit LHAs may keep 100% of the net meter credit savings.

3692: Other Revenue - Operating Reserves: This account should be credited with funds that LHAs plan to utilize from their operating reserve accounts in excess of the Allowable Non-Utility Expense Level (ANUEL). To be approvable, LHA must maintain the DHCD prescribed operating reserve minimum level after deducting the amount budgeted. The only exception to this is when the expenses are for health and safety issues.

3693: Other Revenue – Net Meter: This account should be normally be credited with 75% of the total net meter credit savings realized by a deficit LHA, while surplus LHAs with net meter credit savings would enter \$0 here. Savings are calculated as the value of the net meter credits appearing on the LHA’s electric bills (or, in some cases, paid in cash to the LHA by their utility company), minus the cost of the payments made to the solar power developer under their Power Purchase Agreement (PPA). Deficit LHAs normally may retain 25% of the savings. That amount should be included as Other Revenue – Retained on line #3691. However, please note that for the period 7/1/16 through 6/30/19 all LHAs may retain 100% of their total net meter credit savings, and should report those savings as Other Revenue – Retained on line #3691

3801: Operating Subsidy – DHCD (400-1): This account represents all state-funded operating subsidy to be received and or to be earned for the fiscal year. At the end of each fiscal year, this account will be adjusted in the operating statement to equal the actual subsidy earned by the LHA.

3802: Operating Subsidy – MRVP/AHVP Landlords:

The credit balance in this account represents the anticipated total receipts from DHCD during the fiscal year for housing assistance payments to landlords. At the end of each fiscal year this account will be adjusted to equal the actual subsidy earned.

3920: Gain/Loss from Sale or Disposition of Property (Capitalized or Non-Capitalized): The debit or credit balance of this account represents the following items: a) Cash proceeds from the sale of property that was either: 1) non-capitalized; or 2) capitalized and has been fully depreciated, and b) Realized gain or loss from the sale or disposition of capitalized property that has not been fully depreciated.

4110: Administrative Salaries: This account should be charged with the gross salaries of LHA personnel engaged in administrative duties and in the supervision, planning, and direction of maintenance activities and operating services during the operations period. It should include the salaries of the executive director, assistant executive director, accountants, accounting clerks, clerks, secretaries, project managers, management aides, purchasing agents, engineers, draftsmen, maintenance superintendents, and all other employees assigned to administrative duties.

4120: Compensated Absences: The debit balance in this account represents the actual cost incurred during the fiscal year for vacation, paid holidays, vested sick leave and earned compensatory time. This account includes both the direct compensated absences cost and associated employer payroll expenses (employment taxes, pension cost, etc.).

4130: Legal Expense: This account should be charged with retainers and fees paid to attorneys for legal services relating to the operation of the projects.

4140: Compensation to Authority Members: A local authority may compensate its members for performance of their duties and such other services as they may render to the authority in connection with its Chapter 200 development(s). Compensation for any other program is not authorized. Because of this, LHAs must base such compensation only on the actual rent receipts for these developments plus a prorated share of other operating receipts of funds on a per unit basis. The precise amount that members may be compensated is defined by statute to a maximum of \$40 per member per day, and \$50 for the chairperson per day. The total of all compensation to all board members is not to exceed two percent (2%) of actual gross income of Chapter 200 developments in any given year, consistent with the approved budget amount. In no case shall the payment of compensation exceed \$12,500 annually for the chairperson, or \$10,000 for any member other than the chairperson. Please note the statute requires the member to perform housing authority business in order to receive compensation.

4150: Travel and Related Expense: Legitimate travel expenses incurred by board members and staff in the discharge of their duties for any **state-aided program** are reimbursable from this account, as consistent with Department policy.

4170: Contractual Accounting Services: Fees for accounting services that are provided routinely and are contracted for on an annual basis. Only accounting services performed on a contractual basis (fee accountant) should be included in this item. Full or part-time LHA accounting staff that provides routine accounting services should be included in Account 4110, Administrative Salaries.

4171: Audit Costs: This account includes the state program's prorated share of audit fees paid to an Independent Public Accountant (IPA). The procurement of an IPA is necessary to satisfy the Federal Government's audit requirements. Costs for these services should be shared with all state and federal programs of LHA. **Audit costs are to be absorbed within the ANUEL.** The new Agreed Upon procedures (AUP) audit costs for state-assisted public housing programs should also be included in this account.

4180: Penalties and Interest: Any expenses incurred from penalties, fees, and interest paid on delinquent accounts shall be included in this line item.

4190: Administrative Other: This account is provided for recording the cost of administrative items for which no specific amount is prescribed in this 4100 group of accounts. It includes, but is not limited to, the cost of such items as: reports and accounting forms; stationery and other office supplies; postage; telephone services; messenger service; rental of office space; advertising for bids; publications; membership dues; collection agency & court costs, training costs; management fees, and fiscal agent fees.

4191: Tenant Organization: LTO Funding by the LHA. Upon request the LHA shall fund all LTOs in a city or town at the annual rate of \$6.00 per state-aided public housing unit occupied or available for occupancy by residents represented by such LTO(s) or an annual total of \$500.00 prorated among all such LTO(s), whichever is more. For more information on the creation and funding of LTOs see 760 CMR 6.09.

Authorities which operate computer learning centers, which are funded by the state consolidated budget or by other sources (which are typically recorded in line #3691 as "Other Revenue Retained", should budget the cost of the centers on this line.

4310: Water: This account should be charged with the cost of water and sewer charges purchased for all purposes.

4320: Electricity: This account should be charged with the total cost of electricity purchased for all purposes. Many LHAs have entered into Net Meter Credit Power Purchase Agreements (PPA's). In these deals, an LHA executes a contract with a solar power developer who constructs and owns an off- site solar electricity-generating site. In exchange for contracting to purchase a percentage of the solar power produced, the LHA receives a credit on its utility electric bill for each KWH purchased or in some cases receives a direct cash payment from their utility company. Please ensure that the amount charged to this account is the total cost of electricity BEFORE any reductions due to the receipt of net meter credits.

4330: Gas: This account should be charged with the cost of gas (natural, artificial, or liquefied) purchased for all purposes.

4340: Fuel: This account should be charged with the cost of coal, fuel oil, steam purchased, and any other fuels (except electricity and gas) used in connection with Local Housing Authority operation of plants for the heating of space or water supplied to tenants as a part of rent.

4360: Energy Conservation: This account is to be charged with costs incurred for energy conservation measures.

4390: Other Utilities: This account should be charged with the cost of utilities which are not provided for in accounts 4310 through 4360.

4391: Solar Operator Costs: Many LHAs have entered into Net Meter Credit Power Purchase Agreements (PPA's). In these deals, an LHA executes a contract with a solar power developer who constructs and owns an off-site solar electricity-generating site. The LHA makes regular (usually monthly) payments to the developer for its contracted share of the solar electricity produced by the site. Those payments should be entered in this account.

4392: Net Meter Utility Credit (Negative Amount): As noted in account #4391 above, many LHAs have executed Net Meter Credit Power Purchase Agreements (PPA's). In exchange for contracting to purchase a percentage of the solar power produced, the LHA receives a credit on its utility electric bill for each KWH purchased from the developer, which reduces the balance on its electric bill, or, in some cases, the credits are paid in cash to the LHA by the utility company. The total gross amount of the net meter credits that appear on the LHA's utility bills should be carried in this account and entered as a negative number. In cases where credits are paid in cash to the Host LHA, the net balance after paying out the amounts due the participating housing authorities, should also be carried in this account and entered as a negative number.

4410: Maintenance Labor: This account should be charged with the gross salaries and wages, or applicable portions thereof, for LHA personnel engaged in the routine maintenance of the project.

4420: Materials & Supplies: This account should be charged with the cost of materials, supplies, and expendable equipment used in connection with the routine maintenance of the project. This includes the operation and maintenance of automotive and other movable equipment, and the cost of materials, supplies, and expendable equipment used in connection with operating services such as janitorial services, elevator services, extermination of rodents and household pests, and rubbish and garbage collection.

4430: Contract Costs: This account should be charged with contract costs (i.e. the cost of services for labor, materials, and supplies furnished by a firm or by persons other than Local Authority employees) incurred in connection with the routine maintenance of the project, including the maintenance of automotive and other movable equipment. This account should also be charged with contract costs incurred in connection with such operating services as janitorial services, fire alarm and elevator service, extermination of rodents and household pests, rubbish and garbage collection, snow removal, landscape services, oil burner maintenance, etc.

4510: Insurance: Includes the total amount of premiums charged all forms of insurance. Fire and extended coverage, crime, and general liability are handled by DHCD on a statewide basis. All other necessary insurance policies include: Workers' Compensation, boiler, vehicle liability and owner, etc.

4520: Payments in Lieu of Taxes:

This account should be charged with all payments in lieu of taxes accruing to a municipality or other local taxing body.

4540: Employee Benefits: This account should be charged with local housing authority contributions to employee benefit plans such as pension, retirement, and health and welfare plans. It should also be charged with administrative expenses paid to the State or other public agencies in connection with a retirement plan, if such payment is required by State Law, and with Trustee's fees paid in connection with a private retirement plan, if such payment is required under the retirement plan contract.

Employee benefits are based upon a given percentage of the total payroll; therefore, the total amount approved in this account will be based on the approved budgeted salaries representing the state's fair share.

4541: Employee Benefits - GASB 45: This line covers "Other Post-Employment Benefits" (OPEB). Of the total benefits offered by employers to attract and retain qualified employees, some benefits, including salaries and active-employee healthcare are taken while the employees are in active service, whereas other benefits, including post-employment healthcare and other OPEB are taken after the employees' services have ended. Nevertheless, both types of benefits constitute compensation for employee services. In accordance with required accounting practices, this amount is not projected in the budget (and is therefore blank) but the estimated future costs of this item is carried in the operating statement.

4542: Pension Expense – GASB 68: The primary objective of GASB 68 Statement is to improve accounting and financial reporting for pension costs. It also improves information provided by state and local governmental employers about financial support for pensions that is provided by other entities. As with account 4541 above, in accordance with required accounting practices, this amount is not projected in the budget (and is therefore blank) but the estimated future costs of this item is carried in the operating statement.

4570: Collection Loss: The balance in this account represents the estimated expense to cover unexpected losses for tenant rents. Note: Do not include losses from fraud/retroactive balances here. Report them in Account 4571 – Collection Loss – Fraud/Retroactive.

4571: Collection Loss – Fraud/Retroactive: The balance in this account represents the estimated expense to cover unexpected losses for tenant rents due to unreported income, i.e. fraud/retroactive balances.

4580: Interest Expense: The debit balance in this account represents the interest expense paid and accrued on loans and notes payable. This debt can be from operating borrowings or capital borrowings.

4590: Other General Expense: This account represents the cost of all items of general expenses for which no specific account is prescribed in the general group of accounts.

4610: Extraordinary Maintenance – Non-Capitalized: This account should be debited with all *costs* (labor, materials and supplies, expendable equipment (such as many tools or routine repair parts), and contract work) of repairs, replacements (but not replacements of non-expendable equipment), and rehabilitation of such a substantial nature that the work is clearly not a part of the routine maintenance and operating program. The items charged to this account should not increase the useful life or value of the asset being repaired. These items are not capitalized and are not added as an increase to fixed assets at the time of completion. Nor are these items depreciated. An example of this would be scheduled repainting of apartments.

4611: Equipment Purchases – Non-Capitalized: This account should be debited with the costs of equipment that does not meet the LHA's criteria for capitalization. Because these items are being expended when paid, they should not be categorized as a fixed asset and therefore will not be depreciated. These items include stoves, refrigerators, small tools, most computers and software, etc.

The budget is a planning tool and as our portfolio ages it is essential that LHAs evaluate their properties annually and plan for extraordinary maintenance. To that end DHCD very strongly recommends that for all 400-1 operating budgets, depending on the age of the portfolio and condition, LHAs spend between \$100 and \$500 a year per unit in Extraordinary Maintenance, Equipment Purchases, Replacement of Equipment, and Betterments & Additions to ensure that the aging public housing stock is preserved.

4715: Housing Assistance Payments: This account should be debited with all housing assistance payments paid to landlords for the MRVP program on a monthly basis.

4801: Depreciation Expense: This account should be debited with annual fixed asset depreciation expenses as determined by the LHA's capitalization policy.

7520: Replacement of Equipment – Capitalized: This account should be debited with the acquisition cost (only the net cash amount) of non-expendable equipment purchased as a replacement of equipment of substantially the same kind. These items, such as vehicles, computers, or furniture, meet the LHA's criteria for capitalization and will also be added to fixed assets and therefore depreciated over the useful life.

7540: Betterments & Additions – Capitalized: This account should be debited with the acquisition cost (only the net cash amount) of non-expendable equipment and major non-routine repairs that are classified as a betterment or addition. These items meet the LHA's criteria for capitalization and will also be added to fixed assets and therefore depreciated over the useful life of the asset. Examples are: major roof replacement, structural repairs such as siding, or major paving work.

In accordance with GAAP accounting, inventory purchases (Replacement of Equipment and Betterments & Additions) are distinguished between capitalized and non-capitalized items. Any inventory or equipment purchase greater than \$5,000 is required by DHCD to be capitalized, inventoried and depreciated. Any inventory or equipment purchase costing \$1,000 to \$4,999 should be inventoried by LHA staff for control

purposes only but is not subject to capitalization or depreciation, it is, however, required to be expensed when the items are paid for. An LHA's inventory listing should include both capitalized and non-capitalized items of \$1,000 and more, as well as all refrigerators and stoves of any value. All items that appear on the inventory listing should be tagged with a unique identification number, and all refrigerators and stoves (regardless of value) should be tagged. LHAs may adopt a capitalization policy that capitalizes inventory purchases at a lesser amount than the \$5,000 requirement (i.e. \$1,000 - \$4,999); however, no capitalization policy can have an amount higher than \$5,000. Any inventory or equipment purchases costing \$0 to \$999 are to be expensed when paid for.

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 2019 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 Hampshire Cty. Reg. Hous. 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.

Due to the COVID-19 emergency, on-site assessments by the Facilities Management Specialists were cancelled for the December fiscal year end housing authorities. Therefore, there are no ratings for the Facility Management categories.

Category: Management

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

Rating: No Findings

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: Corrective Action

Reason: TAR reports for quarter ending 09/30/2019 were not submitted on time.

Response: We will be more conscientious about the due date of future reports.

Criterion: Certifications and Reporting Submissions - timely submission of statements and certifications

Rating: Operational Guidance

Criterion: Completion of mandatory online board member training

Rating: No Findings

Category: Financial

Criterion: Adjusted Net Income - a measure of overspending or underspending.

Rating: No Findings

Criterion: Current Operating Reserve as a percentage of total maximum reserve level.

Rating: No Findings

Category: Capital Planning

Criterion: Capital Improvement Plan (CIP) submitted on time.

Rating: No findings

Criterion: Timely spending of capital funds awarded under the Formula Funding program

Rating: Operational Guidance

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	0	0
Tenant related violations	0	0

Category: Facility Management - Inspections

Criterion: LHA Conducted 100% of the Unit Inspections.

Rating:

Criterion: Inspection reports noted 100% of the necessary repairs in each unit.

Rating:

Criterion: 100% of inspection-related work orders were generated.

Rating:

Criterion: Work order system identifies, tracks, and can produce reports for inspection work orders.

Rating:

Criterion: Inspection work orders were completed within 30 calendar days from the date of inspection, OR if cannot 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:

Category: Facility Management - Work Order System

Criterion: Emergency work orders defined per Property Management Guide, identified, tracked, reportable.

Rating:

Criterion: Emergency work orders initiated within 24-48 hours.

Rating:

Criterion: Vacancy work orders identified, tracked and reportable.

Rating:

Criterion: Vacancy work orders were completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver.

Rating:

Criterion: Comprehensive Preventive Maintenance Program exists & preventive work orders identified, tracked, and reportable.

Rating:

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

Rating:

Criterion: Requested work orders identified, tracked and reportable.

Rating:

Criterion: Requested work orders were completed in 14 calendar days from the date of tenant request or if not completed 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:

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:

Explanation of PMR Criteria Ratings

CRITERION	DESCRIPTION
Management	
Occupancy Rate	<p>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)</p> <ul style="list-style-type: none"> • “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)	<p>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)</p> <ul style="list-style-type: none"> • “No Findings” : At or below 2% • “Operational Guidance” : More than 2% , but less than 5% • “Corrective Action” : 5% or more
Certifications and Reporting Submissions	<p>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.</p> <ul style="list-style-type: none"> • “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	<p>Percentage of board members that have completed the mandatory online board member training.</p> <ul style="list-style-type: none"> • “No Findings” : 80% or more completed training • “Operational Guidance” : 60-79.9% completed training • “Corrective Action” : <60 % completed training

CRITERION	DESCRIPTION
Financial	
Adjusted Net Income	<p>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.</p> <p>Underspending Rating:</p> <ul style="list-style-type: none"> • “No Findings” : 0 to 9.9% • “Operational Guidance”: 10 to 14.9% • “Corrective Action”: 15% or higher <p>Overspending Rating:</p> <ul style="list-style-type: none"> • “No Findings” : 0 to -4.9% • “Operational Guidance”: -5% to -9.9% • “Corrective Action”: -10% or below
Operating Reserves	<p>Current Operating Reserve as a percentage of total maximum reserve level. Appropriate reserve level is buffer against any unforeseen events or expenditures.</p> <ul style="list-style-type: none"> • “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 Improvement Plan (CIP) Submitted	<p>Housing authorities are required to submit a five-year capital plan every year.</p> <ul style="list-style-type: none"> • “No Findings” =Submitted on time and no modifications required or modifications made within 45 days. • “Operational Guidance” =Up to 45 days late and no modifications required or modifications made within 45 days. • “Corrective Action” =More than 45 days late or modifications required and not completed within 45 days.
Capital Spending	<p>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</p> <ul style="list-style-type: none"> • “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	<p>Housing authorities are required to conduct inspections of all their occupied units at least once a year</p> <ul style="list-style-type: none"> • "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	<p>Housing authorities are required to note all of the deficiencies found during inspections</p> <ul style="list-style-type: none"> • "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	<p>Housing authorities are required to generate work orders for all deficiencies noted during inspections</p> <ul style="list-style-type: none"> • "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	<p>Work order system identifies, tracks, and can produce reports for inspection work orders.</p> <ul style="list-style-type: none"> • "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	<p>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).</p> <ul style="list-style-type: none"> • "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	<p>Emergency work orders should be defined per <u>Property Management Guide</u>, identified, tracked, reportable.</p> <ul style="list-style-type: none"> • “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	<p>Emergency work orders should be initiated within 24 to 48 hours.</p> <ul style="list-style-type: none"> • “No Findings”: Emergency work orders initiated within 24-48 hours • “Corrective Action”: Emergency work orders not initiated within 24-48 hours
Vacancy Work Orders	<p>Vacancy work orders should be identified, tracked and reportable.</p> <ul style="list-style-type: none"> • “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	<p>Vacancy work orders should be completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver.</p> <ul style="list-style-type: none"> • “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	<p>Housing authorities are required to maintain a comprehensive preventive maintenance program in which preventive work orders are identified, tracked, and reportable.</p> <ul style="list-style-type: none"> • “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	<p>Routine work orders should be identified, tracked, reportable and completed regularly.</p> <ul style="list-style-type: none"> • “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 Orders	<p>Requested work orders should be identified, tracked and reportable.</p> <ul style="list-style-type: none"> • “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 Orders Completion	<p>Requested work orders should be completed in 14 calendar days from the 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.</p> <ul style="list-style-type: none"> • “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	<p>Housing authorities should have a 24 Hour Emergency Response System and distribute Emergency Definition to Residents, Staff, and Answering Service (if applicable).</p> <ul style="list-style-type: none"> • “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

Policies

The following policies are currently in force at the Hampshire Cty. Reg. Hous. Authority:

Policy	Last Ratified by Board Vote	Notes
*Rent Collection Policy	11/05/2014	
*Personnel Policy	12/14/2017	
*Capitalization Policy	10/31/2014	
*Procurement Policy	12/18/1998	
*Grievance Policy	05/11/1999	
Investment Policy	08/15/2018	
Reasonable Accommodations Policy	05/11/1999	
Sexual Harassment Policy	05/11/1999	
Other – Define in the ‘Notes’ column	10/31/2014	Check Signing Policy
Smoking Policy	07/15/2017	Effectuated 10/15/2018
Criminal Offender Records Information (CORI) Policy	04/11/1995	
Maintenance and Other Charges	05/02/2012	PPE
Other – Define in the ‘Notes’ column	06/02/2000	Preventative Maintenance Policy
Pet Policy	03/11/2010	
Other – Define in the ‘Notes’ column	10/29/2014	Tag Sale Policy
Parking	11/29/2017	
Other – Define in the ‘Notes’ column	03/11/2010	Pet Policy

Policy	Last Ratified by Board Vote	Notes
Other – Define in the ‘Notes’ column	10/31/2014	Drug Free Workplace
Other – Define in the ‘Notes’ column	11/29/2017	Air Conditioner Policy
Other – Define in the ‘Notes’ column	04/11/2007	Laundry Facility Policy
Other – Define in the ‘Notes’ column	05/31/2017	Seasonal Outdoor Policy
Other – Define in the ‘Notes’ column	12/21/2017	Storm Parking Policy
Emergency Response Plan	05/09/2007	
Community Room Use	03/23/2011	
Other – Define in the ‘Notes’ column	04/11/2012	Carpet Cleaning Policy
Other – Define in the ‘Notes’ column	03/14/2007	Wage Match Policy
Affirmative Action Policy	05/11/1999	
Other – Define in the ‘Notes’ column	06/13/2007	Lock out Policy
Other – Define in the ‘Notes’ column	12/14/2015	Credit Card Policy

* Starred policies are required by DHCD. Policies without a “Latest Revision” date are not yet in force.

The list of policies has been provided by the LHA and has not been verified by DHCD.

Waivers

AP-2021-Hampshire Cty. Reg. Hous.-00108 has no current waivers from the regulations of the Department of Housing and Community Development (DHCD).

Attachments

The following items have been uploaded as attachments to this Annual Plan.

Due to the COVID-19 emergency, on-site Performance Management Review (PMR) assessments by the Facilities Management Specialists were cancelled for the December fiscal year end housing authorities. Therefore, the Facility Management categories have been omitted from the PMR document.

- Local Tenants Organization (LTO) Letters
- Public Comments and LHA Responses
- Cover sheet for tenant satisfaction surveys
- Tenant Satisfaction Survey - 667only
- Performance Management Review



HAMPSHIRE COUNTY REGIONAL HOUSING AUTHORITY

37 MAIN STREET, #15
CUMMINGTON, MA 01026
413-634-5000
www.hcrha.com

August 13, 2020

Attention all Tenants of Hillside Terrace

There will be a meeting:

Thursday, August 20, 2020 at 1p.m. in the Courtyard.

To go over the ANNUAL PLAN with Sue.

Wear your masks!





HAMPSHIRE COUNTY REGIONAL HOUSING AUTHORITY

37 MAIN STREET, #15
CUMMINGTON, MA 01026
413-634-5000
www.hcrha.com

August 13, 2020

Attention all Tenants of Hamblin Court

There will be a meeting:

Thursday, August 20, 2020 at 4p.m. in the Courtyard.

To go over the ANNUAL PLAN with Sue.

Wear your masks!





HAMPSHIRE COUNTY REGIONAL HOUSING AUTHORITY

37 MAIN STREET, #15
CUMMINGTON, MA 01026
413-634-5000
hcrha@crocker.com

October 1, 2020

RE: Annual Plan for Hampshire County Regional Housing Authority

The Public Hearing took place on September 30, 2020 at 3:00pm

This was a virtual meeting via Zoom.

No one from the Public attended this hearing.

After review the HCRHA Board of Commissioners voted to approve the Annual Plan noting that the Personnel Policy will need updating at a future date.

Susan Gregory
ED



Resident Surveys – Background:

Since 2016 DHCD has been working with the Center for Survey Research at the University of Massachusetts Boston to survey residents in the state public housing units it oversees. The surveys are confidential, mailed directly to the residents and returned to the Center by mail (or, starting in 2019, completed on-line). In Round One of the surveys, conducted over the period 2016-2018, residents of elderly/disabled developments (also known as c. 667 developments) and family units (also known as c. 705 and c. 200 developments) were surveyed in four groups as described below. (Note: there are many more c. 667 units, so they were broken down into three groups).

ROUND ONE SURVEYS

Spring 2016: (c. 200 and c. 705)

Fall 2016: (667 - Group 1)

Fall 2017: (667 - Group 2)

Fall 2018: (667 - Group 3)

By the end of 2018, all residents were surveyed in Round One with one exception: in the case of the twelve housing authorities with **more than** 225 c. 200 family units, a randomly selected group of 225 c. 200 residents were surveyed. This group was determined to be large enough to generate statistically useful results.

Round Two of the surveys began in 2019. The current plan is to complete all Round Two surveys in four groups as follows:

ROUND TWO SURVEYS

Fall 2019 (667 - Group 1) - COMPLETED

Fall 2020 (200s and 705s)

Fall 2021 (667 - Group 2)

Fall 2022 (667 - Group 3)

Please Note:

1. If there were at least twenty responses from residents of BOTH an authority's c.667 units AND from their c.200/705 units, then there is a separate report for each program.
2. If there were fewer than twenty responses in EITHER program, but at least twenty responses combined, then the elderly and family results were combined into a single report.
3. To protect resident confidentiality, survey results are generally reported ONLY for authorities that had at least twenty total resident responses from their combined c.667/200/705 residents. Therefore, a few smaller authorities that didn't have twenty responses do not have a published survey report.
4. Because the 2019-2022 surveys ask some different questions than the 2016-2018 survey, the results can't be combined (i.e., 2019 c.667 results can't be combined with 2016 c.200/705 results, as described in #2 above).
5. Responses from family residents in c.200 and c.705 housing are always combined together.

HAMPSHIRE COUNTY REGIONAL HOUSING AUTHORITY

Chapter 667 Housing Summary 2016 - 2018

DHCD is working with the Center for Survey Research at the University of Massachusetts Boston to survey residents in the housing units it oversees.

Fall 2016:

- Surveys were sent to 9624 housing units (Chapter 667). 5511 surveys were filled out and returned.

Fall 2017:

- Surveys were sent to 6024 housing units (Chapter 667). 3391 surveys were filled out and returned.

Fall 2018:

- Surveys were sent to 13,304 housing units (Chapter 667). 6717 surveys were filled out and returned.
- In the **Hampshire County Regional Housing Authority**, surveys were sent to a total of **36** housing units (Chapter 667); **26** surveys were completed.

This report provides some information about how the residents from the **Hampshire County Regional Housing Authority** who answered the survey responded. It compares their answers to those from residents in the entire state and to those from small LHAs in Western Massachusetts. These small LHAs in Western Massachusetts include: Adams, Amherst, Athol, Barre, Belchertown, Berkshire County Regional, Brimfield, Dalton, East Longmeadow, Easthampton, Granby, Great Barrington, Hadley, Hampshire County Regional, Hatfield, Holyoke, Lee, Lenox, Ludlow, Monson, Montague, Orange, Palmer, Shelburne, South Hadley, Southwick, Stockbridge, Ware, Warren, Wilbraham, and Williamstown.

Communication

Residents in Ch. 667 housing were asked about how they interacted with the Hampshire County Regional Housing Authority in the last 12 months. The table below shows what percentage of residents said they did each of the following:

	Hampshire County Regional Housing Authority	Small LHAs in Western MA*	Entire State
Contacted management about a problem or concern.....	69%	77%	78%
Felt they were usually or always treated with courtesy and respect when they contacted management.....	78%	87%	87%
Saw the Capital Improvement Plan.....	27%	31%	30%
Saw the Operating Budget.....	23%	17%	17%
Knew the Executive Director held a meeting with residents.....	54%	60%	53%

* Small LHAs in Western Massachusetts include: Adams, Amherst, Athol, Barre, Belchertown, Berkshire County Regional, Brimfield, Dalton, East Longmeadow, Easthampton, Granby, Great Barrington, Hadley, Hampshire County Regional, Hatfield, Holyoke, Lee, Lenox, Ludlow, Monson, Montague, Orange, Palmer, Shelburne, South Hadley, Southwick, Stockbridge, Ware, Warren, Wilbraham, and Williamstown.

Services and Programs

54% of the Hampshire County Regional Housing Authority residents in Ch. 667 who responded to the survey said they would be interested in services and programs. Here are the services and programs residents said they would be most interested in participating in:

	Hampshire County Regional Housing Authority	Small LHAs in Western MA	Entire State
Job training programs.....	4%	4%	6%
Money management programs (<i>budgeting, taxes, income building</i>).....	11%	11%	10%
Children's programs (<i>tutoring, childcare, afterschool programs</i>).....	0%	2%	2%
Health and Medical Services (<i>visiting nurse, meal programs</i>).....	50%	36%	35%
Adult Education (<i>GED, ESL, educational counseling</i>)	4%	7%	10%

Maintenance and Repair

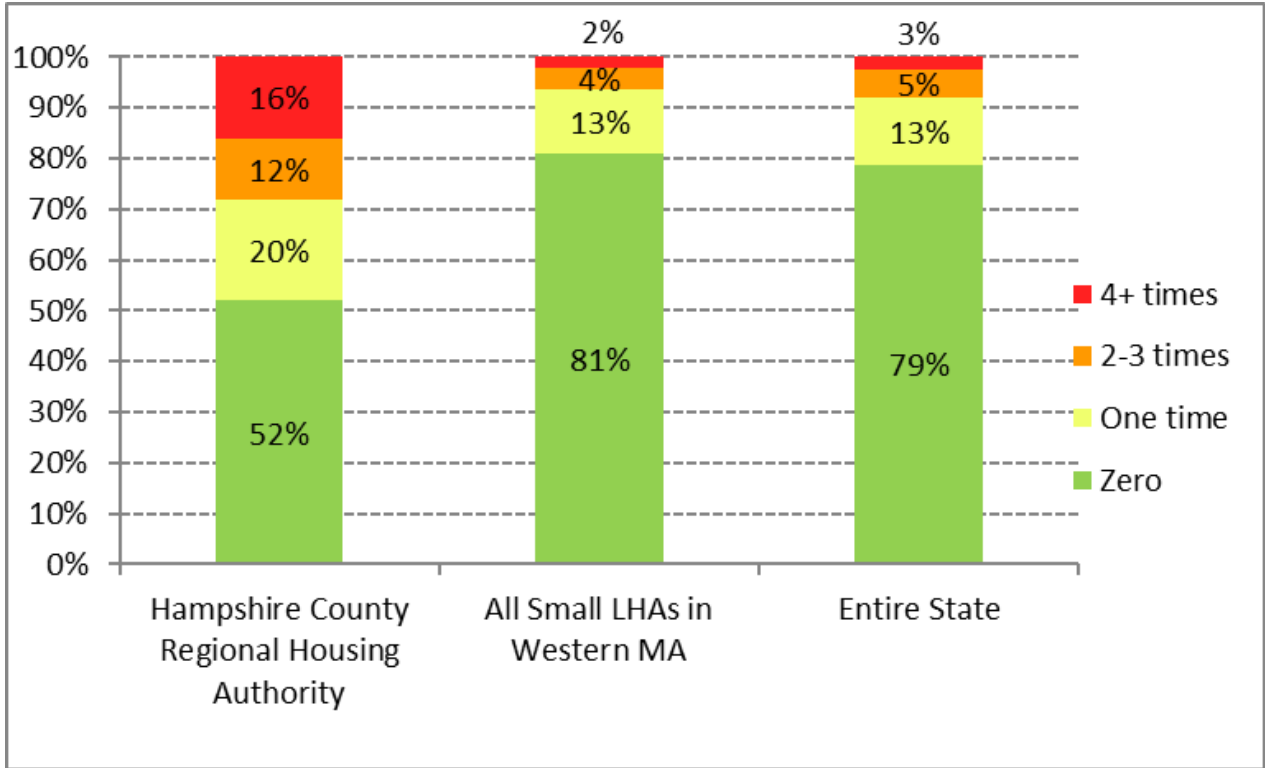
Who had problems? Less than half of respondents had a problem with their heating and less than half had a plumbing problem in the last 12 months.

	Hampshire County Regional Housing Authority	Small LHAs in Western MA	Entire State
Had a heating problem.....	46%	18%	21%
Had a problem with water or plumbing.....	42%	46%	49%

- **Heating Problems**

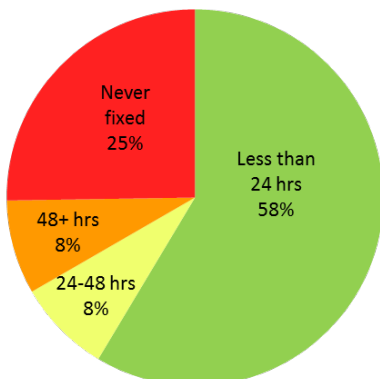
How many times did residents have heating problems?

The chart below shows how many times respondents had heat problems in the last 12 months. The green part of the bars shows what percentage of residents did not have the problem at all. The yellow shows who had the problem one time. The orange shows those who had the problem 2-3 times. And the red shows those who had the problem 4 or more times in the last 12 months.

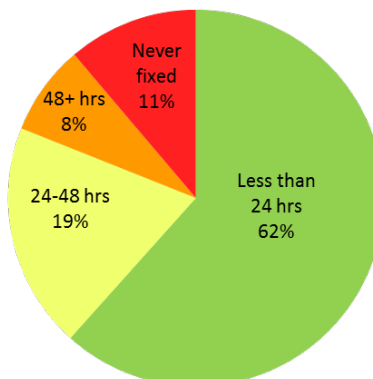


How long did it take to fix the heating problems? For those respondents who had problems, we asked how long it usually took for the problems to be fixed – less than 24 hours, 24 - 48 hours, more than 48 hours, or never fixed.

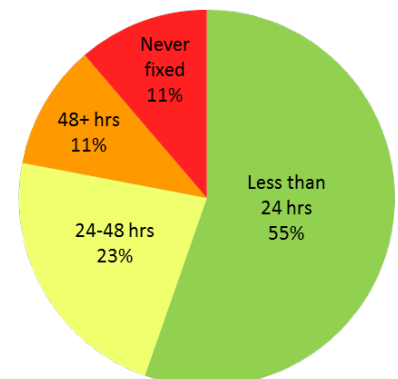
Hampshire County Regional Housing Authority



Small LHAs in Western MA



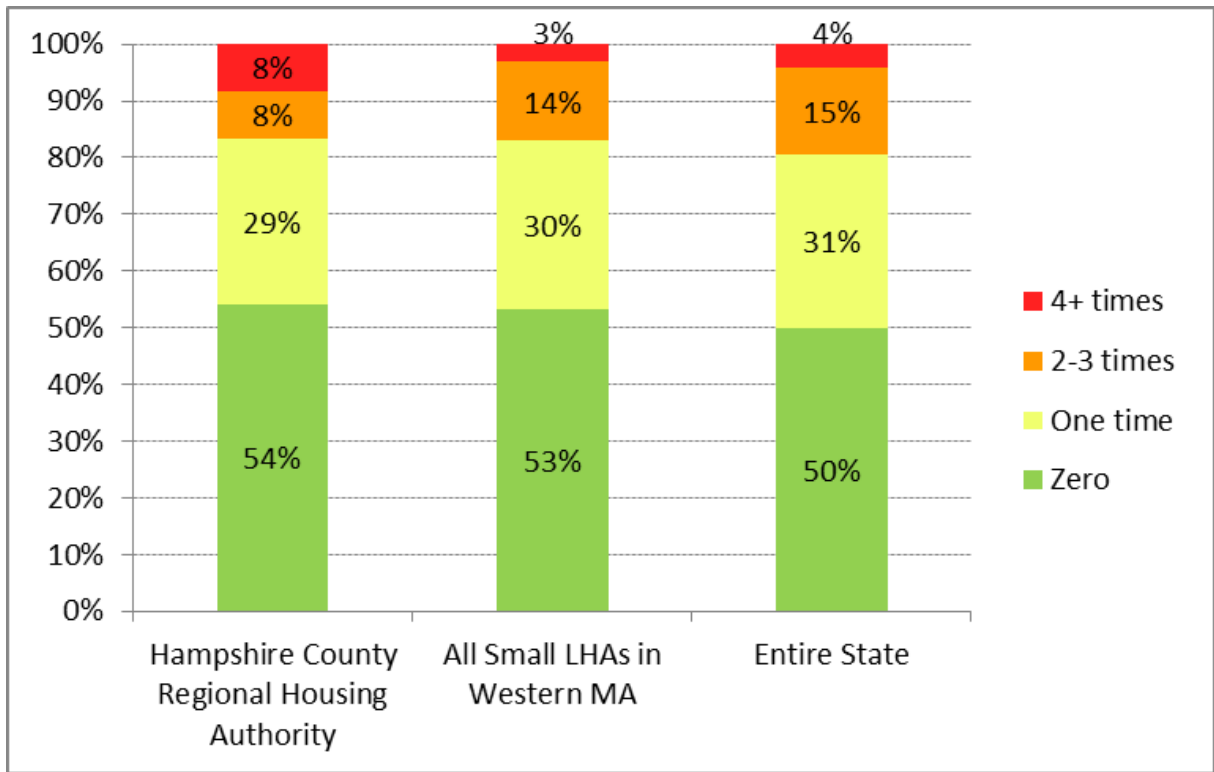
Entire State



- **Water or Plumbing Problems**

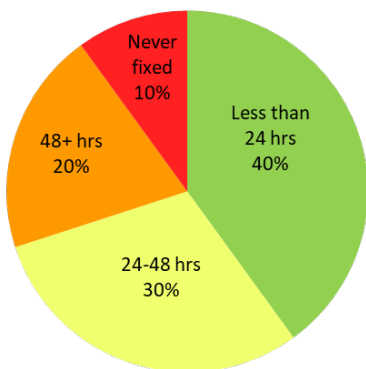
How many times did residents have problems with their water or plumbing?

The chart below shows how many times respondents had water or plumbing problems in the last 12 months. The green part of the bars shows what percentage of residents did not have the problem at all. The yellow shows who had the problem one time. The orange shows those who had the problem 2-3 times. And the red shows those who had the problem 4 or more times in the last 12 months.

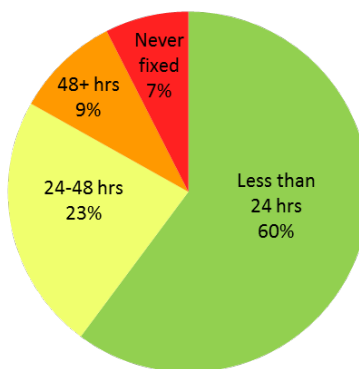


How long did it take to fix the water or plumbing problems? For those respondents who had problems, we asked how long it usually took for the problems to be fixed – less than 24 hours, 24 - 48 hours, more than 48 hours, or never fixed.

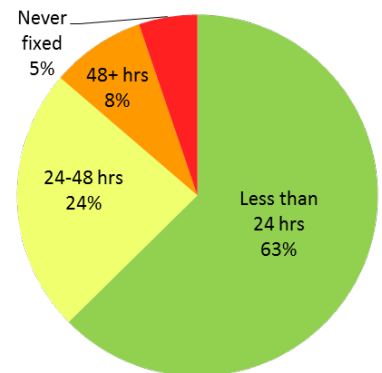
Hampshire County Regional Housing Authority



Small LHAs in Western MA

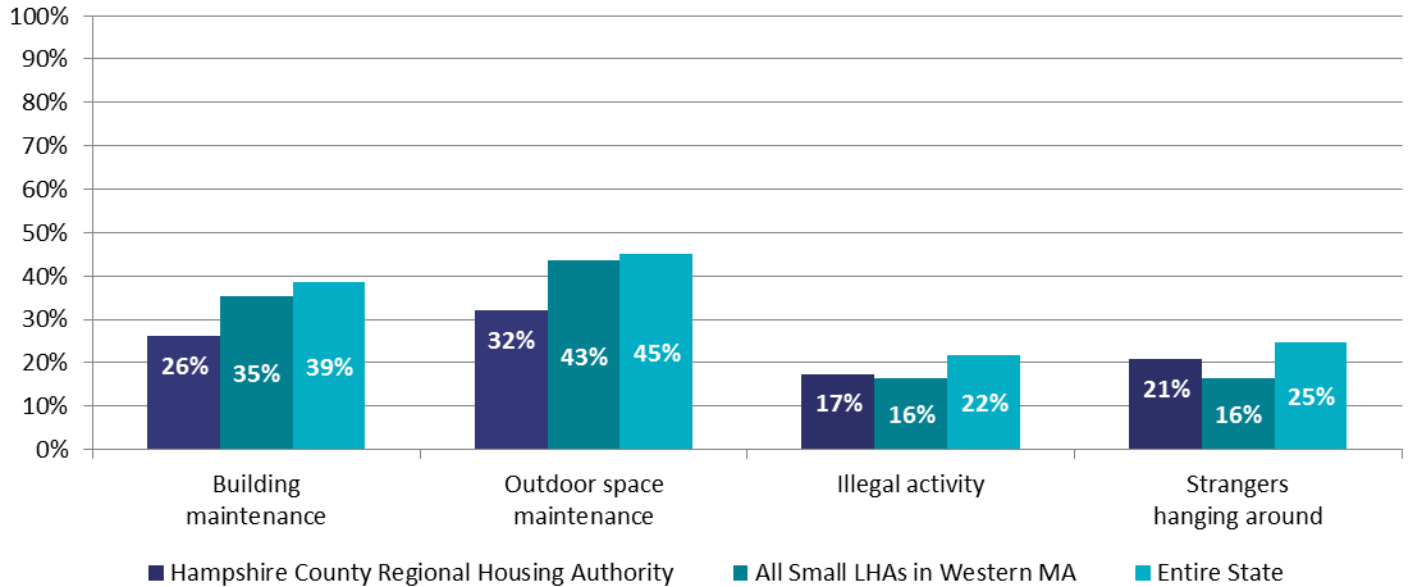


Entire State



- What other problems did respondents have?** Respondents were asked how often they had problems with: building maintenance (*such as clean halls and stairways and having lights and elevators that work*), outdoor space maintenance (*such as litter removal and clear walk ways*), illegal activity in the development, and strangers hanging around who should not be there. The chart below shows what percentage of respondents said that they “always” or “sometimes” had this problem in the last 12 months.

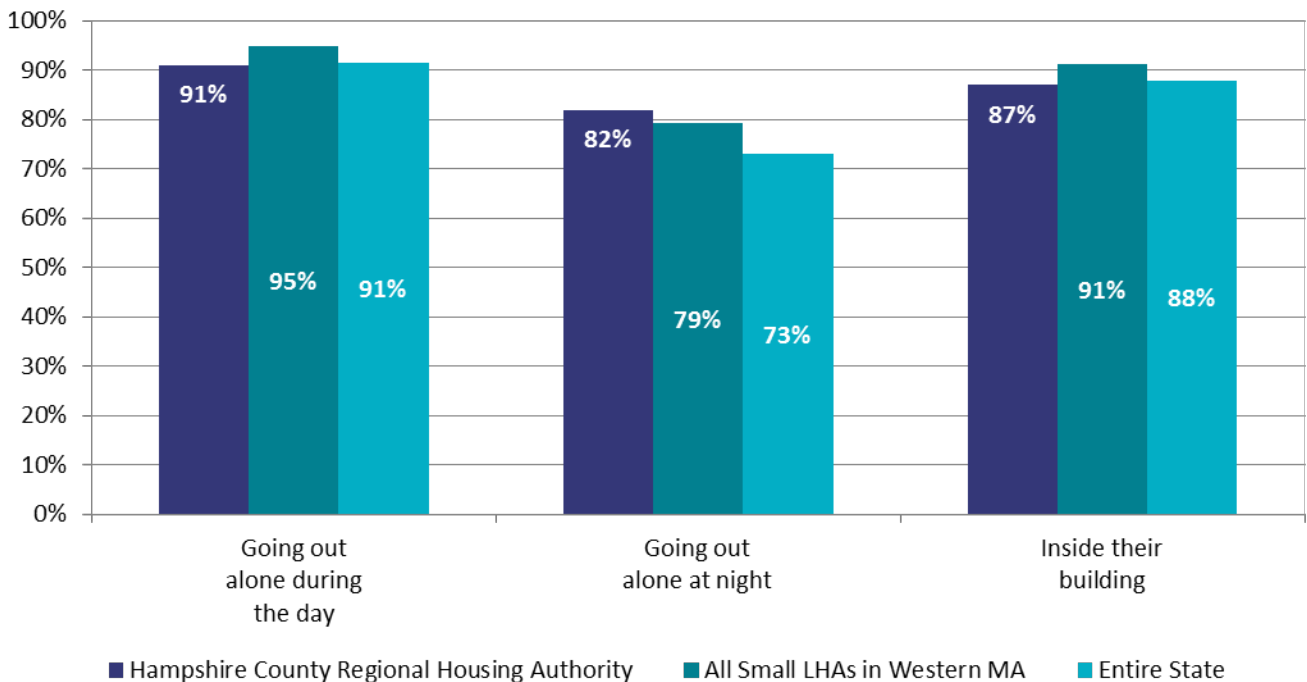
Respondents who “always” or “sometimes” had problems with....



Safety

Respondents were asked how safe they felt in their building and going outside alone. The chart below shows what percentage of people said they felt “very safe” or “mostly” safe.

Respondents who felt “very safe” or “mostly safe”



HAMPSHIRE COUNTY REGIONAL HOUSING AUTHORITY

Performance Management Review (PMR) Report

Fiscal Year End 12/31/2019

*For a detailed report of the Performance Management Review (PMR), please contact the Local Housing Authority

Performance Management Review

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)

PMR Desk Audit Ratings Summary

For a detailed report of the Performance Management Review (PMR), please contact the Local Housing Authority

Housing Authority	Hampshire County Regional Housing Authority
Fiscal Year Ending	12/31/2019
Housing Management Specialist	Carolina Gonzalez
Facilities Management Specialist	Bruce Budrick

Criteria	Score/Rating			
	Management			
Occupancy Rate	c.667	c.705	c.200	Cumulative
	No Findings	No Findings	Not Applicable	No Findings
Tenant Accounts Receivable (TAR)	c.667	c.705	c.200	Cumulative
	Corrective Action	Corrective Action	Not Applicable	Corrective Action
Board Member Training	No Findings			
Certifications and Reporting Submissions	Operational Guidance			
Financial				
Adjusted Net Income	No Findings			
Operating Reserves	No Findings			

LHA Hampshire CNTY

FYE 12/31/2019

Occupancy

Rating All: No Findings
Rating 667: No Findings
Rating 200: Not Applicable
Rating 705: No Findings

- Enter vacancies into system at least monthly and ensure that there are no duplicates. Reach out to HMS if accidental duplicates occur.
- Use online vacancy system, see user guide if need help. All vacancies must be reported; and quarterly certifications must be completed certifying all data is in system. Request waivers when applicable.
- Follow tenant selection best practices to improve vacancy turnover (pulling lists in CHAMP as soon as vacancy occurs and previewing list to prescreen in advance of vacancies as needed).
- Include unit turnovers in capital improvement plan.
- Engage in a management agreement or contract with private firms to help with heavy unit turnover.
- Review turnovers with staff weekly or biweekly to monitor status of vacant units.
- Develop plan for updating units with long term occupancy to limit turn over time at vacancy; family units may need consistent attentions o when lease up, condition is not affecting vacancy turnover time.
- Ensure that yearly inspection findings are addressed and address tenant damage/lease violations.
- Other:**

Tenant Accounts Receivable (TAR)

Rating All: Corrective Action
Rating 667: Corrective Action
Rating 200: Not Applicable
Rating 705: Corrective Action

- Create or update rent collection policy and procedures and submit to DHCD for review, with supporting Board vote.
- Adhere to your rent collection policy and lease, i.e. sending notices, reminder letters, 14 day notice to quit, 30 day notice etc. Send notices to tenants early and frequently.
- Increase ways to accept rent payment, i.e. check scanners, lock boxes, electronic debit, autopay, etc.
- Report to credit bureau when resident has vacated unit with past due rent balance.
- Consider using small claims court (<https://www.mass.gov/info-details/massachusetts-law-about-small-claims>)
- Create written repayment agreements, either in house or court ordered, and ensure they are adhered to.
- Evaluate vacated balances to better understand what is collectible and what is unlikely to be collected. Don't allow tenant balances to build-up before doing lease enforcement. Review aged receivables report regularly.
- Set reasonable thresholds for commencing legal action.
- Ensure proper documentation of past due balances and collection efforts with tenants.

Note: This PMR was conducted remotely in response to the State of Emergency declared on March 10, 2020. See PHN 2020-19.

- Other: TAR reports for quarter ending 09/30/2019 were not submitted on time. Submit all four quarters of Tenants Accounts Receivables (TAR) application within 60 days of quarter end. Please refer to PHN 2018-08 for important dates.**

Certifications and Reporting Submissions

Rating: Operational Guidance

- Submit all four quarterly vacancy certifications by the end of the month following the quarter end.
- Submit all four quarters of Tenants Accounts Receivables (TAR) application within 60 days of quarter end.
- Submit all four quarterly operating statements within 60 days of the quarter end.
- Schedule board meetings well in advance. Consider scheduling a backup date to ensure you are able to have your board vote/approval in time to meet reporting deadlines.
- Set a recurring appointment in your email calendar for help remembering reporting dates and deadlines.
- Other: Vacancy Certifications for all 4 quarters have not been submitted. Also, TAR report for quarter ending 9/30/2019 was not submitted on time. Please refer to PHN 2018-08 for important dates.**

Adjusted Net Income/Revenue

Rating: No Findings

Revenue:

- Update and adhere to rent collection policy
- Update marketing plan
- Update internal policies related to vacant unit turnover
- Review rent roll to identify outstanding rents and/or patterns of rent delinquency.
- Review operating statements to identify trends in revenue collection such as LHA-wide or development-centered rent issues.
- Follow tenant selection best practices to improve vacancy turnover (pulling lists in CHAMP as soon as vacancy occurs and previewing list to prescreen in advance of vacancies as needed)
- Set up repayment agreements with tenants as soon as tenant becomes in arrears; do not let large balances accrue.
- Make it easier for tenants to pay rent. For example, consider online payments, lockboxes for night time drop-off or extended office hours
- Review budget reports with both fee accountant/financial staff and your board to stay on top of revenue trends.
- Ensure rent determinations are completed regularly and are in adherence with DHCD policy

Note: This PMR was conducted remotely in response to the State of Emergency declared on March 10, 2020. See PHN 2020-19.

Expense:

Salaries

- Monitor expenses throughout the year; over or underspending in certain budget lines, can be fixed by reducing or increasing other lines to ensure you stay within your ANUEL.
- Consider a reorganization of staff time/roles and improve processes.
- Hire temporary workers or offer overtime to current employees to pick up the workload of staff out on leave.
- Ensure your budget is in compliance with state and federal requirements regarding allocations.

Legal

- Review and if needed revise tenant selection process, rent collection process and notice to quit process to reduce evictions/legal costs.
- Start tracking or better estimate eviction costs based on historical averages throughout the year. If legal costs for evictions are running higher than expected, reduce other budget lines to ensure you stay within your ANUEL.
- If you qualify, use DHCD's regional attorney program.

Utilities

- Use online resources such as WegoWise, MassEnergyInsight or software provided by your utility company to track and monitor utility usage. Review the usage monthly to look for unusual expenditures.
- Weatherize units to improve insulation. Reach out to maintenance director or DHCD staff for more information.
- Request a referral from your HMS to DHCD's sustainability coordinator if you are interested in saving money through the installation of low-flow toilets, showerheads, LED lights or other cost-savings, energy-efficient measures. DHCD frequently has incentive programs that pay for the procurement and installation of energy and water saving appliances and tools at your LHA.
- Ensure that you have an air conditioner policy that precludes a/c being in windows out of season/enforce policy if already in place.

Maintenance

- Develop or update your preventive maintenance, deferred maintenance and routine maintenance plans and review monthly with maintenance staff.
- Develop or update your procurement and purchasing policies and review with staff.
- Develop a system to schedule and track preventive maintenance, reach out to your facilities management specialist for assistance.
- If contractor costs are high, see if your current maintenance team can complete the work or if it is possible to contract with a tradesman.
- Consider bulk purchasing for supplies and shop around for the best deals.
- Consider investing (through purchase or maintenance) in equipment that may reduce hours spent on maintenance (such as a snow blower to reduce time shoveling).

Other:

-

Operating Reserve

Rating: No Findings

- Please refer to PHN 2018-04 and current budget guidelines for information on operating reserve
- An LHA may spend down to 35% of maximum reserve level without consulting DHCD, but the LHA must budget these expenses in the correct line items of their annual operating budget. If the expense occurred after DHCD approval of the annual operating budget, the LHA should submit a budget revision with these expenditures.
- Any expenditures from the operating reserve that will result in a projected operating reserve of less than 35% of maximum reserve level, requires *prior written approval* from DHCD, *unless the expenses are to resolve health and safety issues*.
- Each LHA must maintain a projected operating reserve of 20% of maximum reserve level, which *remains the minimum operating reserve level for all LHAs*.
- Other:**

Board Member Training

Rating: No Findings

- Ensure you update the board attendance application with the most recent board members, and their term dates.
- Ensure each board member has a unique email for the board member training.
- Provide computer guidance as needed to help board members complete the training.
- Other:**

PMR Capital Benchmarks for LHA Fiscal Year 2019

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD) PMR Fiscal Year 2019	
For a detailed report of the Performance Management Review (PMR), please contact the Local Housing Authority	
Criteria	Score/Rating
	Capital
Capital Improvement Plan (CIP) Submitted	No Findings
Capital Spending	Operational Guidance