Annual Plan 2022 Overview and Certification

# Springfield Housing Authority Annual Plan for Fiscal Year 2022 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 LHA Board of Commissioners; 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 Board 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).

#### **Overview and Certification**

The Springfield Housing Authority's Annual Plan for their 2022 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. Substantial Comments
  - b. Cover sheet for tenant satisfaction surveys
  - c. Tenant Satisfaction Survey 667only
  - d. MOR Report 016
  - e. MO Report 045
  - f. MOR Report 058
  - g. MOR Response

# Annual Plan 2022

#### **Overview and Certification**

### 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	Туре	Development Name	Num Bldgs	Year Built	Dwelling Units
667-01	Elderly	CARPE DIEM 667-01	12	1956	75
667-03	Elderly	FOREST PARK 667-03	16	1963	116
667-02	Elderly	HARRY HOGAN 667-02	4	1960	32
667-06	Elderly	MORRIS SCHOOL 667-06	1	1926	19
667-07	Elderly	MORRIS SCHOOL EXTENSION 667-07	5	1989	45
667-04	Elderly	ORCHARD MANOR 667-04	8	1965	40
705-02	Family	SCATTERED SITE 705-02	10	1985	18
	Other	Special Occupancy units	13		47
	Family	Family units in smaller developments	4		8
Total			73		400

The following development(s) operate under a combination of state and federal requirements, including HUD's Section 8 New Construction and Substantial Rehabilitation Program (see the Glossary for a program description).

Dev No	Туре	Development Name	Num Bldgs	Year Built	Dwelling Units
667-05	Elderly	GENTILE APARTMENTS 667-05	1	1977	102
200-1A	Family	REED VILLAGE S8NCSR Units 200-1A	12	1949	50
705-01	Family	SCATTERED SITE 705-01	11	1981	16

### Massachusetts Rental Voucher Program (MRVP)

The Massachusetts Rental Voucher Program (MRVP) is a state-funded program that provides rental subsidies to low-income families and individuals. In most cases, a "mobile" voucher is issued to the household, which is valid for any market-rate housing unit that meets the standards of the state sanitary code and program rent limitations. In some cases, vouchers are "project-based" into a specific housing development; such vouchers remain at the development if the tenant decides to move out.

Springfield Housing Authority manages 308 MRVP vouchers.

### Federally Assisted Developments

Springfield Housing Authority also manages Federally-assisted public housing developments and/or federal rental subsidy vouchers serving 4758 households.

## LHA Central Office

Springfield Housing Authority P.O. Box 1609, Springfield, MA, 01104-1609 Denise Jordan, Executive Director Phone: 413-785-4500 Email: fgousseynoff@shamass.org

## LHA Board of Commissioners

	<u>Role</u>	<u>Category</u>	<u>From</u>	<u>To</u>
Thomas Labonte	Chair	Labor Appointee	07/12/2012	03/25/2021
Jessica Quinonez		Federal Tenant Rep	04/19/2013	05/25/2021
Angela Robles	Vice-Chair		07/20/2012	03/25/2020
Willie Thomas		State Appointee	05/11/2009	04/07/2019
Raymond Warren	Treasurer		01/21/2004	03/28/2008

Springfield Housing Authority (LHA)

### Annual Plan 2022 Overview and Certification

## Plan History

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

REQ	REQUIREMENT				
		COMPLETED			
Α.	Advertise the public hearing on the LHA website.	10/30/2020			
В.	Advertise the public hearing in public postings.	10/30/2020			
C.	Notify all LTO's and RAB, if there is one, of the hearing and				
	provide access to the Proposed Annual Plan.	N/A			
D.	Post draft AP for tenant and public viewing.	10/30/2020			
Ε.	Hold quarterly meeting with LTO or RAB to review the draft AP.				
	(Must occur before the LHA Board reviews the Annual Plan.)	N/A			
F.	Annual Plan Hearing. Hosted by the LHA Board, with a quorum of members present. (For Boston, the Administrator will host the hearing.)	12/15/2020			
G.	Executive Director presents the Annual Plan to the Board.	12/15/2020			
H.	Board votes to approve the AP. (For Boston Housing Authority, the Administrator approves and submits the AP.)	12/15/2020			

### Certification

### CERTIFICATION FOR SUBMISSION OF THE ANNUAL PLAN

I, Denise Jordan, Executive Director of the Springfield Housing 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: 12/23/2020

The Department of Housing and Community Development (DHCD) completed its review of this Annual Plan (AP) on February 17, 2021. Review comments have been inserted into the plan.

Annual Plan 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.

#### Annual Plan

#### 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)	\$1,624,156.95		Total of all FF awards minus prior FF spending
LHA Emergency Reserve	\$243,623.54		Amount to reserve for emergencies
Net FF Funds (First 3 Years of the CIP)	\$1,380,533.41		Funds to plan & amount actually planned in the first 3 years of the CIP
ADA Set-aside	\$8,343.61	\$8,343.61	Accessibility projects
DMH Set-aside	\$25,861.82	\$25,861.75	Dept. of Mental Health facility
DDS Set-aside	\$68,087.47	\$68,087.47	Dept. of Developmental Services facility
Unrestricted Formula Funding (FF)	\$1,278,240.50	\$1,342,825.49	Funds awarded by DHCD to be used on projects selected by the LHA and approved by DHCD.
Special DHCD Funding	\$99,870.94	\$99,870.94	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 of town for specific projects.
Operating Reserve(OR) Funds	\$0.00	\$0.00	Funds from the LHA's operating budget.
Other Funds	\$0.00	\$0.00	Funds other than those in the above categories. See explanation below.
Total funds and planned spending	\$1,480,404.35	\$1,544,989.26	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.

12/22/2020

### **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
281107	HSFY15: Handicap Ramps/Sidewalks /Mold Remediation/Tre e Removal/Chimne ys/Hatchways	BARRIER FREE 689-01	\$73,017	\$73,017	\$0	\$0	\$0	\$0	\$0	\$0
281117	FF: Kitchen Cabinet/Sink Replacement - Carpe Diem	CARPE DIEM 667-01	\$1,556,179	\$881,479	\$0	\$674,700	\$0	\$0	\$0	\$0
281121	Replace Roofs - Forest Park - Phase 1	FOREST PARK 200-02	\$101,775	\$0	\$0	\$0	\$0	\$0	\$0	\$0
281122	Kitchen Modernization	HARRY HOGAN 667-02	\$219,713	\$0	\$0	\$0	\$0	\$0	\$0	\$0
281123	Boiler Replacement	BARRIER FREE 689-01	\$120,000	\$0	\$0	\$0	\$0	\$0	\$0	\$0
281124	Kitchen & Bath Upgrades	EGAN 689-2A	\$59,484	\$0	\$0	\$0	\$0	\$0	\$0	\$0
281125	Kitchen & Bath Upgrades - Manhatten	MANHATTAN STREET 689-2B	\$29,934	\$0	\$0	\$0	\$0	\$0	\$0	\$0
•	Walkways and Concrete stair repairs	FOREST PARK 667-03	\$141,790	\$0	\$0	\$0	\$0	\$0	\$0	\$141,790
•	Replacement of Roofs, gutters, and downspouts	MORRIS SCHOOL EXTENSION 667-07	\$407,430	\$0	\$0	\$0	\$6,447	\$273,562	\$127,422	\$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
	Replace furnaces at 603 Berkshire Communiy Room	MORRIS SCHOOL EXTENSION 667-07	\$57,094	\$0	\$0	\$0	\$0	\$0	\$4,127	\$52,968
•	Exterior door replacement - Orchard Manor	ORCHARD MANOR 667-04	\$393,155	\$0	\$0	\$0	\$0	\$0	\$183,010	\$210,146
	Walkways - Address Trip Hazards	EGAN 689-2A	\$15,000	\$0	\$0	\$0	\$15,000	\$0	\$0	\$0
TOTALS			\$3,174,571	\$954,496	\$0	\$674,700	\$21,447	\$273,562	\$314,559	\$404,903

#### FUNDS IN ADDITION TO ANNUAL FORMULA FUNDING AWARD

Cap Hub	Project Name	DHCD Special		Special DHCD Awards				Other	Funding	
Project Number		Award Comment	Emergency Reserve	Compliance Reserve	Sustain- ability	Special Awards	CDBG	СРА	Operating Reserve	Other Funds
281117	HSFY15: Handicap Ramps/Sidewalks/ Mold Remediation/Tree Removal/Chimney s/Hatchways FF: Kitchen Cabinet/Sink Replacement - Carpe Diem	HSFY15: Handicap Ramps/Sidewalks/ Mold Remediation/Tree Removal/Chimneys /Hatchways Asbestos removal	\$0 \$0	\$0 \$128,000	\$0 \$0	\$73,017 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0
TOTALS			\$0	\$128,000	\$0	\$73 <i>,</i> 017	\$0	\$0	\$0	\$0

## 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.

Springfield Housing 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.

Springfield Housing Authority has not requested additional funding.

### 3. Overall goals of the Housing Authority's CIP

The SHA's continuing goals are to up grade existing components in the interior and exterior of our units. Focusing on the replacement of out dated heating equipment. The SHA has a project to replace deteriorating roofs at one of our 667's. The SHA is currently working with local utilities to upgrade inefficient equipment through there grant programs to relieve the financial burden off the operating and capital funds.

### 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:

We have added the following projects to our plan. At our 667-07 Replacement of Roofs, gutters, and downspouts., as well as Replace furnaces at 603 Berkshire Community Room. At our 689-2A Walkways - Address Trip Hazards and finally at our 667-03 Walkways and Concrete stair repairs.

### 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 06/30/2020.

#### 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 08/28/2020.

#### 8. Project priorities

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

#### 9. High priority deficiencies

We have not been able to include all of our high priority (CPS priority 1 and 2) projects in our CIP:

At this junction we have depleted our funding resources. We will continue to address other deficiencies when additional funds are available

#### 10. Accessibility

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

#### 11. Special needs development

Springfield Housing Authority has one or more special needs (167 or 689 programs) development. We have completed the service provider input process according to the required procedures detailed in the lease agreement and held an annual meeting with the service provider staff at all special needs developments as of 01/23/2020.

#### 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.

Springfield Housing / LHA)		ipital Improvement		epared for Submittal to DHCD		
	Electric PUM > Threshold	Gas PUM > Threshold	Oil PUM > Threshold	Water PUM > Threshold		
Threshold PUM:	\$100	\$80	\$50	\$60		
	667-06	689-01		689-01		
		705-02		705-01		
		705-03		705-02		
				705-03		

Annual Plan

We have applied for a LEAN Grant but have not heard back yet. This should eventually help reduce consumption. We are answering No to 13-B as we are still awaiting a response.

#### **13.** Energy or water saving initiatives

Springfield Housing 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% c. 667 (DHCD Goal 2%) 0% c. 200 (DHCD Goal 2%) 4% c. 705 (DHCD Goal 2%)

Springfield Housing Authority will address the excess vacancies in the following manner: There are no specific projects to decrease the current vacancy rate in the 705's. Vacancy in one of our 705's was for an extensive amount of time due to the current pandemic. The SHA was unable to show the unit during April and May 2020.

#### 15. Vacancies

Springfield Housing Authority has no units listed as vacant, proposed to be vacant, or at risk of becoming vacant.

# **CIP Approval For Springfield Housing Authority for FY 2021**

Formula Funding Capital Improvement Plan (CIP), WorkPlan 5001

2/17/2021

Congratulations! The CIP-2021 submitted by Springfield Housing Authority is approved, subject to the following conditions:

Springfield Housing Authority is authorized to proceed on the following projects, which are to be managed with the LHA or RCAT as the Primary PM\*\*:

CPS Number	FISH #	Project Name	TDC Amount	Primary PM	Project Year
281-689-2A-S01-20-1004	281127	Walkways - Address Trip Hazards	\$15,000.00	LHA	2021

#### Projects for which the Primary PM is DHCD or RCAT - Large\*\*

CPS Number	FISH #	Project Name	TDC Amount *	Other Funding	DHCD Staff Arch/ Eng	WO/RFS Date
281-667-07-0-20-999	281126	Replacement of Roofs, gutters, and downspouts	\$407,430.00	\$0.00	JOLSEN	08/03/2021

Going forward, if you need to add a project that is not in your approved CIP you will need to submit a revision through CIMS. Instructions for revising your CIP can be found on the CIMS Forms menu.

Details of the Approved CIP can be found at the link to 'Approved & Active CIP Reports' on the CIMS forms page in the CIP Reports section. Projects may utilize funding from multiple sources. The 'Original Approved' report details the proposed funding as submitted by the LHA. Please feel free to call DHCD Project Manager Jackline Monteiro-Mendes at (617) 573-1193 with any questions.

\* Where the TDC is followed by an asterisk the project has been indicated as 'Complex' by DHCD.

\*\*'Primary PM' is used to identify the agency responsible for updating a project's budget and schedule.

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.
    - 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 Answering Service	413-594-1250	24/7
Call LHA at Phone Number	413-785-4500	8:00am-4:30PM

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 Springfield Housing 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		
Door or window lock failure		
No heat		
Snow or ice hazard condition		
Dangerous structural defects		
Inoperable smoke/CO detectors, beeping or chirping		
Elevator stoppage or entrapment		

#### 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	413-785-4500	8:00am-4:30pm
Submit Online at Website		
Email to Following Email	Property Managers	24/7
Other		

#### 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:

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.	$\checkmark$
2	Maintenance Requests logged into the work system	$\checkmark$
3	Work Orders generated	$\checkmark$
4	Work Orders assigned	$\checkmark$
5	Work Orders tracked	$\checkmark$
6	Work Orders completed/closed out	$\checkmark$
7	Maintenance Reports or Lists generated	$\checkmark$

#### **Maintenance Plan Narrative**

Following are Springfield Housing 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?

Based on the feedback we received from multiple sources we feel that our maintenance operations is in good standing.

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

State mandated restrictions, due to COVID-19, limited access to fulfilling non-emergency work orders in units.

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

To prioritize all existing work orders delayed due to COVID-19 restrictions and get them processed.

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	\$685,379.00	\$0.00
Last Fiscal Year Actual Spending	\$0.00	\$0.00
Current Fiscal Year Budget	\$0.00	\$0.00

#### E. Unit Turnover Summary

# Turnovers Last Fiscal Year	51
Average time from date vacated to	
make Unit "Maintenance Ready"	39 days
Average time from date vacated to	
lease up of unit	57 days

#### Attachments

These items have been prepared by the Springfield Housing Authority and appear on the following pages:

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

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

#### **DHCD Review Comment Regarding the Attachments**

DHCD staff have reviewed the LHA's maintenance plan attachments and have the following comments:

SHA attached a Maintenance Policy but not a deferred maintenance plan. I will review requirements with SHA when I do a training.



# MAINTENANCE POLICY

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## **1.0 COMPONENTS OF A MAINTENANCE SYSTEM**

The SHA maintenance system includes the following components:

- A. A system of priorities for work requests;
- B. Comprehensive working procedures;
- C. Performance goals;
- D. A work order system;
- E. A skills training program; and
- F. A long-range planning system.

With these components in place, the SHA has the tools it needs to control the performance of maintenance work at the SHA.

## 1.1 Priority system

The work priorities adopted by the SHA exemplify its philosophy of delivering maintenance services. This priority system ensures that the most important maintenance work is done at a time it can be performed most cost-effectively. Minimizing vacancy loss is part of the cost-effectiveness calculation. The maintenance priorities of the SHA are the following:

- 1. Emergencies maintenance needs representing threats to life, health, safety.
- 2. Maintenance needs related to curb appeal, facility appearance and preventative maintenance.
- 3. Maintenance required preparing a unit for occupancy.
- 4. Maintenance work which will have a negative impact on the property if it is not completed. This priority level will include most resident on-demand work requests.
- 5. Maintenance needs not included in other areas.

Placing planned maintenance and vacancy preparation work ahead of resident work requests does not indicate that resident requests are unimportant. It emphasizes the importance of maintaining control of the maintenance work by performing scheduled routine and preventive work first. By doing so the SHA will decrease on-demand work and maintain the property in a manner that will keep and attract responsible tenants.

## 1.2 Develop procedures

The Assistant Executive Director(s) ("AED") will ensure that there are sufficient clear procedures in place to allow staff to implement this maintenance policy statement. All procedures will include the following:

- 1. A statement of purpose;
- 2. The job title(s) of the staff member(s) responsible for carrying out the activities in the procedure;
- 3. Any forms needed to carry out the activities; and
- 4. The frequency of any specified activities.

After their adoption, maintenance procedures will be reviewed and updated at least annually.

## **1.3** Develop performance standards and goals

The AED(s) will establish measures that will allow the effectiveness of maintenance systems and activities to be evaluated. In establishing these standards the SHA will take into consideration certain factors:

- 1. State/Local housing codes;
- 2. HUD Housing Quality Standards;
- 3. Public Housing Assessment System (PHAS) standards;
- 4. SHA Collective bargaining agreements; and
- 5. SHA job descriptions.

Nothing in the documents listed above will prevent the SHA from setting a standard that is higher than that contained in the documents.

These standards and goals will be used to evaluate current operations and performance and to develop strategies to improve performance and meet the standards that have been set.

## 1.4 Work Order System

The SHA shall have a comprehensive work order system that includes all work request information: source of work, description of work, priority, cost to complete, days to complete, and hours to perform. This information is required for the SHA to plan for the delivery of maintenance services as well as evaluate performance. To obtain the greatest effectiveness from the work order system, all work requests and activities performed by maintenance staff must be recorded on work orders.

Work orders will contain, at a minimum, the following information:

- 1. Preprinted number
- 2. Source of request (planned, inspection, resident, etc.)
- 3. Priority assigned
- 4. Location of work
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- 7. Worker(s) assigned
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In order to allow its staff members to perform to the best of their abilities, the SHA recognizes the importance of providing the staff with opportunities to refine technical skills, increase and expand craft skills, and learn new procedures.

The AED(s) are responsible for developing a training curriculum for the departmental staff and working with the Executive Director to identify the means of delivering the training.

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The SHA will put in place a long-range maintenance planning capability in order to ensure the most cost-effective use of SHA resources and the maximum useful life of SHA properties.

The AED(s) and Modernization Coordinator will develop a property-specific long-range planning process that includes the following components:

- 1. A property maintenance standard;
- 2. An estimate of the work required to bring the property to the maintenance standard;
- 3. An estimate of the work required to keep the property at the maintenance standard including routine and preventive maintenance workloads, vacant unit turn-around, inspection requirements and resident on-demand work;
- 4. An estimate of the on-going cost of operating the property at the maintenance standard;
- 5. A market analysis of the property to determine if there are any capital improvements needed to make the property more competitive;
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- 7. A revised work plan and cost estimate of maintaining property at the improved standard.

By developing a work plan, the SHA will be able to anticipate its staff, equipment and materials needs. It will also be possible to determine need for contracting particular services.

## 2.0 MAINTAINING THE PROPERTY

All maintenance work performed at SHA properties can be categorized by the source of the work. Each piece of work originates from a particular source: an emergency, the routine maintenance schedule, the preventive maintenance schedule, a unit inspection, a unit turnover, or a resident request.

## 2.1 Responding to Emergencies

Emergencies are the highest priority source of work. The SHA work item to be an emergency if the following occur:

- 1. The situation constitutes a serious threat to the life, safety or health of residents or staff; or
- 2. The situation will cause serious damage to the property structure or systems if not repaired within twenty-four (24) hours.

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For emergencies that occur after regular working hours, the SHA shall have a twenty-four (24) emergency response system in place. This response system includes the designation of a maintenance employee in charge for each day as well as a list of qualified pre-approved contractors, open purchase orders for obtaining required supplies or equipment, and access to SHA materials and supplies. The designated employee shall prepare a work order and report on any emergency within twenty-four hours after abatement of the emergency.

## 2.2 Prepare Vacant Units for Reoccupancy

It is the policy of the SHA to reoccupy vacant units as soon as possible. This policy allows the Authority to maximize the income produced by its properties and operate attractive and safe properties.

The AED(s) are responsible for developing and implementing a system that ensures a passing grade under PHAS for unit turnaround time. In order to do so, he or she must have a system that can perform the following tasks:

- 1. Forecast unit preparation needs based on prior years' experience;
- 2. Estimate both the number of units to be prepared and the number of hours it will take to prepare them; and
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The maintenance procedure for reoccupying vacant units relies on the prompt notification by management of the vacancy, fast and accurate inspection of the unit, ready availability of workers and materials, and good communication with those responsible for leasing the unit.

The AED(s) have the ability to create special teams for vacancy turnaround or to hire contractors when that is required to maintain SHA goals with the approval of the Executive Director.

## 2.3 Preventive Maintenance Program

Preventive maintenance is part of the planned or scheduled maintenance program of the SHA. The purpose of the scheduled maintenance program is to allow the Authority to anticipate maintenance requirements and make sure the SHA can address them in the most cost-effective manner. The

preventive maintenance program focuses on the major systems that keep the properties operating. These systems include heating and air conditioning, electrical, life safety and plumbing.

### A. General Operating Systems

The heart of any preventive maintenance program is a schedule that calls for the regular servicing of all systems. The development of this schedule begins with the identification of each system or item that must be checked and serviced, the date it must be serviced, and the individual responsible for the work. The servicing intervals and tasks for each system must be included in the schedule. The completion of all required tasks is considered a high priority for the Springfield Housing Authority.

The systems covered by the preventive maintenance program include but are not limited to:

- 1. Catch basins
- 2. Compactors
- 3. Condensate pumps
- 4. Electric transformer and emergency generators
- 5. Elevator equipment
- 6. Emergency lighting
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A specific program will be developed for each system. This program shall include a list of the scheduled service maintenance for each system and the frequency and interval at which that service must be performed. The equipment and materials required to perform the service will be listed as well so that they will be on hand when needed. As assessment of the skills or licensing needed to perform the tasks will also be made to determine if an outside contractor must be used to perform the work. The preventive maintenance schedule must be updated each time a system is added, updated, or replaced.

### **B.** Roof Repairs/ Replacement

Maintenance of roofs requires regular inspections by knowledgeable personnel to ensure that there is no unauthorized access to roof surfaces and that there is good drainage, clear gutters and prompt discovery of any deficiencies.

The AED(s) are responsible for the development of a roof maintenance plan that includes these features:

- 1. The type, area, and age of roof
- 2. Warranties and/or guarantees in effect
- 3. Company that installed the roof
- 4. Expected useful life of roof
- 5. History of maintenance and repair
- 6. Inspection schedule

The SHA maintenance staff will usually undertake only minor roof repairs. Therefore there should be a list of approved roofing contractors to take on more serious problems for roofs no longer under warranty.

### C. Vehicle/Equipment Maintenance

The SHA will protect the investment it has made in vehicles and other motorized equipment by putting in place a comprehensive maintenance program. The vehicles and equipment to be covered include:

- 1. Cars, trucks and vans
- 2. Tractors
- 3. Bobcats
- 4. Snow blowers
- 5. Leaf blowers
- 6. Weed cutters
- 7. Lawn Mowers
- 8. Chain saws

The AED(s) are responsible for the development of this plan which shall contain components for minimal routine service as well as servicing for seasonal use. Serviceable components for each vehicle or piece of motorized equipment will be listed in the plan along with the type and frequency of service required.

The AED(s) shall also maintain a system to ensure that any employee that operates a vehicle or piece of motorized equipment has the required license or certification.

### D. Lead-Based Paint

The SHA is committed to controlling lead-based paint hazards in all its dwellings, especially family dwellings constructed before 1978. If any hazards are discovered, the SHA will develop a plan to abate the hazard. The AED(s) shall have the authority and responsibility to direct all activities associated with lead hazard control. The control plan will include such activities as:

- 1. Detecting the possible presence of lead paint;
- 2. Protection of residents and workers from lead-based paint hazards;
- 3. Surface protection of non-painted surfaces;
- 4. Equipment use and care;
- 5. Paint quality; and
- 6. Method of application.

Other responsibilities include directing training sessions, issuing special work orders, informing residents, responding to cases of children with elevated blood lead levels, correcting lead-based paint hazards on an emergency repair basis, and any other efforts that may be appropriate.

The SHA's plan to control such hazards is detailed in a risk assessment report and lead hazard control plan.

### E. Life Safety Systems

The SHA shall have a comprehensive program for maintenance of life safety systems to ensure that they will be fully functional in the case of an emergency. The AED(s) shall be responsible for the

development and implementation of a schedule that includes the inspection, servicing and testing of this equipment. The equipment to be included in the plan includes the following:

- 1. Fire alarms and fire alarm systems
- 2. Fire extinguishers
- 3. Fire hoses
- 4. Emergency generators
- 5. Emergency lighting
- 6. Smoke detectors
- 7. Sprinkler systems

The plan will include the required testing and servicing as required by manufacturer's recommendations. It will also include a determination of the most reliable and cost effective way to perform the work including the decision to hire a contractor.

## 2.4 Inspection Program

The SHA's goals of efficiency and cost-effectiveness are achieved through a carefully designed and rigorously implemented inspection program. This program calls for the inspection of all areas of the SHA's facilities -- the dwelling units, the grounds and building exteriors, and major service systems.

### A. Dwelling Unit Inspections

The unit inspection system of the SHA has two primary goals:

- 1. To assure that all dwelling units comply with standards set by HUD and local codes; and
- 2. To assure that the staff of the SHA knows at all times the condition of each unit for which it is responsible.

The achievement of these goals may require more than the annual HUD required inspection. The AED is responsible for developing a unit inspection program that schedules inspections at the frequency required.

For all non-emergency inspections, the Resident shall be given at least two (2) days written notice of the inspection.

The maintenance staff or a UPCS certified contractor shall perform the unit inspection program of the SHA. During each inspection, the staff shall perform specified preventive and routine maintenance tasks. Any other work items noted at the time of the inspection will be documented on the SHA inspection form. All uncompleted work items shall be converted to a work order within twenty-four hours of the completion of the inspection. The maintenance staff shall endeavor to complete all inspection-generated work items within 30 days of the inspection.

All maintenance staff is responsible for monitoring the condition of dwelling units. Whenever a maintenance staff member enters a dwelling unit for any purpose, such as completing a resident request for service or accompanying a contractor, he or she shall record on an inspection form any required work he or she sees while in the apartment. These work items shall also be converted to a service request within twenty-four hours of discovery.

### B. Building and Grounds Inspections

Regular inspections of the property grounds and building exteriors are required to maintain the curb appeal of the property. This curb appeal is required to maintain the attractiveness of the property for both current and prospective residents. The inspection procedure will specify the desired condition of the areas to be inspected. This defined condition will include any HUD or locally required standards. The existence of these standards shall not prevent the SHA from setting a higher standard that will make the property more competitive in the local market.

Building and grounds inspections must cover these areas:

- 1. Hallways
- 2. Stairwells
- 3. Community room and other common space such as kitchens or public restrooms
- 4. Laundry facilities
- 5. Lobbies
- 6. Common entries
- 7. Basements
- 8. Grounds
- 9. Porches or patios
- 10. Parking lots
- 11. Sidewalks and fences
- 12. Lawns, shrubs and trees
- 13. Trash compactors or collection areas
- 14. Building foundations

An inspection form will be developed for common areas and building exteriors and grounds. The staff member responsible for the inspection shall note all deficiencies on the form and ensure that these deficiencies are recorded on work order within twenty-four hours of the inspection. The SHA will complete all inspection-generated work items within thirty (30) days of the inspection.

Nothing in this policy shall prevent any SHA staff member from reporting any needed work that they see in the regular course of their daily activities. Such work items shall be reported to the site manager of the appropriate property.

### C. Systems Inspections

The regular inspection of all major systems is fundamental to a sound maintenance program. The major systems inspection program overlaps with the preventive maintenance program in some areas. To the extent that inspections, in addition to those required for scheduled service intervals, are needed, they will be a part of the inspection schedule. Any work items identified during an inspection shall be converted to a work order within twenty-four hours and completed within thirty (30) days.

## 2.5 Scheduled Routine Maintenance

The SHA includes in this work category all tasks that can be anticipated and put on a regular timetable for completion. Most of these routine tasks are those that contribute to the curb appeal and marketability of the property.

## A. Pest Control/Extermination

The SHA will make all efforts to provide a healthy and pest-free environment for its residents. The Authority will determine which, if any, pests infest its properties and will then provide the best possible treatment for the eradication of those pests.

The Trades Manager will determine the most cost-effective way of delivering the treatment: by contractor or licensed SHA personnel.

The extermination plan will begin with an analysis of the current condition at each property. The Trades Manager shall make sure that an adequate schedule for treatment is developed to address any existing infestation. Special attention shall be paid to cockroaches and bedbugs. The schedule will include frequency and locations of treatment. Different schedules may be required for each property.

Resident cooperation with the extermination plan is essential. All apartments in a building must be treated for the plan to be effective. Residents will be given information about the extermination program at the time of move-in. All residents will be informed at least one week and again twenty-four hours before treatment. The notification will be in writing and will include instructions that describe how to prepare the unit for treatment. If necessary, the instructions shall be bi-lingual to properly notify the resident population.

### B. Landscaping and Grounds

The SHA will prepare a routine maintenance schedule for the maintenance of the landscaping and grounds of its properties that will ensure their continuing attractiveness and marketability.

Routine grounds maintenance includes numerous activities:

- 1. Litter control
- 2. Lawn care
- 3. Maintenance of driveways, sidewalks and parking lots
- 4. Care of flower and shrubbery beds and trees
- 5. Maintenance of playgrounds, benches and fences
- 6. Snow removal

The AED(s) shall be responsible for the development of a routine maintenance schedule that shall include the following:

- 1. A clearly articulated standard of appearance for the grounds that acknowledges but is not limited to HUD and state/local code standards;
- 2. A list of tasks that are required to maintain that standard and the frequency with which the tasks must be performed;
- 3. The equipment, materials, and supplies required to perform the tasks and a schedule for their procurement; and
- 4. A separate snow removal plan including a schedule for preparing equipment for the season and the procurement of other necessary materials and supplies.

### C. Building Exteriors and Interior Common Areas

The appearance of the outside of SHA buildings as well as their interior common areas is important to their marketability. Therefore, the SHA has established a routine maintenance schedule to ensure that they are always maintained in good condition. The components to be maintained include:

### 1. Lobbies

- 2. Hallways and stairwells
- 3. Elevators
- 4. Public restrooms
- 5. Lighting fixtures
- 6. Common rooms and community spaces
- 7. Exterior porches and railings
- 8. Building walls
- 9. Windows

The AED(s) are responsible for the development of a routine maintenance schedule for building exterior and interior common areas. The schedule shall be based on the following:

- 1. A clearly articulated standard of appearance for the building
- 2. A list of tasks required to maintain that standard
- 3. The frequency with which the tasks must be performed
- 4. A list of materials, equipment and supplies required to perform the tasks.
- 5. Interior Painting

The appearance and condition of the paint within each unit is important to unit condition and resident satisfaction. Accordingly, the SHA will develop a plan to ensure that interior paint in resident dwelling units is satisfactorily maintained.

As part of this plan painting standards will be developed that include:

- 1. Surface preparation
- 2. Protection of non-painted surfaces
- 3. Color and finish
- 4. Paint quality
- 5. Methods of application approved
- 6. Lead paint testing and abatement if required

The plan will set out the conditions for the consideration of a painting request. These standards include the period of time that has elapsed since the last time the unit was painted. Alternatives for performance of the work will be included including the conditions under which a resident will be allowed to paint his or her own unit.

## 2.6 Resident On-Demand Service

This category of work refers to all resident generated work requests that fall into no other category. These are non-emergency calls made by residents seeking maintenance service. These requests for service cannot be planned in advance or responded to before the resident calls.

It is the policy of the SHA to complete these work requests within seven (7) days. However, unless the request is an emergency or entails work that compromises the habitability of the unit, these requests will not be given a priority above scheduled routine and preventive maintenance. By following this procedure, the SHA believes it can achieve both good resident service and a maintenance system that completes the most important work first and in the most cost effective manner.

## 3.0 CONTRACTING FOR SERVICES

The SHA will contract for maintenance services when it is in the best interests of the SHA to do so. When the employees of the SHA have the time and skills to perform the work at hand, they will be the first choice to perform a given task. When the employees of the SHA have the skills to do the work required, but there is more work than there is time available to complete it, the SHA will determine whether it is more cost effective to use a contractor to complete the work. If the Authority staff does not have the skills to complete the work, a contractor will be chosen. In the last instance, the Authority will decide whether it will be cost effective to train a staff member to complete the work.

Once the decision has been made to hire a contractor, the process set out in the SHA Procurement Policy will be used. These procedures vary depending on the expected dollar amount of the contract. The AED(s) will work with the Procurement Department to facilitate the contract award. The AED will be responsible for the contribution of the maintenance staff to this process. The most important aspect of the bid documents will be the specifications or statement of work. The clearer the specifications the easier it will be for the SHA to get the work product it requires.



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- 3. Company that installed the roof
- 4. Expected useful life of roof
- 5. History of maintenance and repair
- 6. Inspection schedule

The SHA maintenance staff will usually undertake only minor roof repairs. Therefore there should be a list of approved roofing contractors to take on more serious problems for roofs no longer under warranty.

#### C. Vehicle/Equipment Maintenance

The SHA will protect the investment it has made in vehicles and other motorized equipment by putting in place a comprehensive maintenance program. The vehicles and equipment to be covered include:

- 1. Cars, trucks and vans
- 2. Tractors
- 3. Bobcats
- 4. Snow blowers
- 5. Leaf blowers
- 6. Weed cutters
- 7. Lawn Mowers
- 8. Chain saws

The AED(s) are responsible for the development of this plan which shall contain components for minimal routine service as well as servicing for seasonal use. Serviceable components for each vehicle or piece of motorized equipment will be listed in the plan along with the type and frequency of service required.

The AED(s) shall also maintain a system to ensure that any employee that operates a vehicle or piece of motorized equipment has the required license or certification.

#### D. Lead-Based Paint

The SHA is committed to controlling lead-based paint hazards in all its dwellings, especially family dwellings constructed before 1978. If any hazards are discovered, the SHA will develop a plan to abate the hazard. The AED(s) shall have the authority and responsibility to direct all activities associated with lead hazard control. The control plan will include such activities as:

- 1. Detecting the possible presence of lead paint;
- 2. Protection of residents and workers from lead-based paint hazards;
- 3. Surface protection of non-painted surfaces;
- 4. Equipment use and care;
- 5. Paint quality; and
- 6. Method of application.

Other responsibilities include directing training sessions, issuing special work orders, informing residents, responding to cases of children with elevated blood lead levels, correcting lead-based paint hazards on an emergency repair basis, and any other efforts that may be appropriate.

The SHA's plan to control such hazards is detailed in a risk assessment report and lead hazard control plan.

## E. Life Safety Systems

The SHA shall have a comprehensive program for maintenance of life safety systems to ensure that they will be fully functional in the case of an emergency. The AED(s) shall be responsible for the

development and implementation of a schedule that includes the inspection, servicing and testing of this equipment. The equipment to be included in the plan includes the following:

- 1. Fire alarms and fire alarm systems
- 2. Fire extinguishers
- 3. Fire hoses
- 4. Emergency generators
- 5. Emergency lighting
- 6. Smoke detectors
- 7. Sprinkler systems

The plan will include the required testing and servicing as required by manufacturer's recommendations. It will also include a determination of the most reliable and cost effective way to perform the work including the decision to hire a contractor.

## 2.4 Inspection Program

The SHA's goals of efficiency and cost-effectiveness are achieved through a carefully designed and rigorously implemented inspection program. This program calls for the inspection of all areas of the SHA's facilities -- the dwelling units, the grounds and building exteriors, and major service systems.

#### A. Dwelling Unit Inspections

The unit inspection system of the SHA has two primary goals:

- 1. To assure that all dwelling units comply with standards set by HUD and local codes; and
- 2. To assure that the staff of the SHA knows at all times the condition of each unit for which it is responsible.

The achievement of these goals may require more than the annual HUD required inspection. The AED is responsible for developing a unit inspection program that schedules inspections at the frequency required.

For all non-emergency inspections, the Resident shall be given at least two (2) days written notice of the inspection.

The maintenance staff or a UPCS certified contractor shall perform the unit inspection program of the SHA. During each inspection, the staff shall perform specified preventive and routine maintenance tasks. Any other work items noted at the time of the inspection will be documented on the SHA inspection form. All uncompleted work items shall be converted to a work order within twenty-four hours of the completion of the inspection. The maintenance staff shall endeavor to complete all inspection-generated work items within 30 days of the inspection.

All maintenance staff is responsible for monitoring the condition of dwelling units. Whenever a maintenance staff member enters a dwelling unit for any purpose, such as completing a resident request for service or accompanying a contractor, he or she shall record on an inspection form any required work he or she sees while in the apartment. These work items shall also be converted to a service request within twenty-four hours of discovery.

## B. Building and Grounds Inspections

Regular inspections of the property grounds and building exteriors are required to maintain the curb appeal of the property. This curb appeal is required to maintain the attractiveness of the property for both current and prospective residents. The inspection procedure will specify the desired condition of the areas to be inspected. This defined condition will include any HUD or locally required standards. The existence of these standards shall not prevent the SHA from setting a higher standard that will make the property more competitive in the local market.

Building and grounds inspections must cover these areas:

- 1. Hallways
- 2. Stairwells
- 3. Community room and other common space such as kitchens or public restrooms
- 4. Laundry facilities
- 5. Lobbies
- 6. Common entries
- 7. Basements
- 8. Grounds
- 9. Porches or patios
- 10. Parking lots
- 11. Sidewalks and fences
- 12. Lawns, shrubs and trees
- 13. Trash compactors or collection areas
- 14. Building foundations

An inspection form will be developed for common areas and building exteriors and grounds. The staff member responsible for the inspection shall note all deficiencies on the form and ensure that these deficiencies are recorded on work order within twenty-four hours of the inspection. The SHA will complete all inspection-generated work items within thirty (30) days of the inspection.

Nothing in this policy shall prevent any SHA staff member from reporting any needed work that they see in the regular course of their daily activities. Such work items shall be reported to the site manager of the appropriate property.

## C. Systems Inspections

The regular inspection of all major systems is fundamental to a sound maintenance program. The major systems inspection program overlaps with the preventive maintenance program in some areas. To the extent that inspections, in addition to those required for scheduled service intervals, are needed, they will be a part of the inspection schedule. Any work items identified during an inspection shall be converted to a work order within twenty-four hours and completed within thirty (30) days.

# 2.5 Scheduled Routine Maintenance

The SHA includes in this work category all tasks that can be anticipated and put on a regular timetable for completion. Most of these routine tasks are those that contribute to the curb appeal and marketability of the property.

## A. Pest Control/Extermination

The SHA will make all efforts to provide a healthy and pest-free environment for its residents. The Authority will determine which, if any, pests infest its properties and will then provide the best possible treatment for the eradication of those pests.

The Trades Manager will determine the most cost-effective way of delivering the treatment: by contractor or licensed SHA personnel.

The extermination plan will begin with an analysis of the current condition at each property. The Trades Manager shall make sure that an adequate schedule for treatment is developed to address any existing infestation. Special attention shall be paid to cockroaches and bedbugs. The schedule will include frequency and locations of treatment. Different schedules may be required for each property.

Resident cooperation with the extermination plan is essential. All apartments in a building must be treated for the plan to be effective. Residents will be given information about the extermination program at the time of move-in. All residents will be informed at least one week and again twenty-four hours before treatment. The notification will be in writing and will include instructions that describe how to prepare the unit for treatment. If necessary, the instructions shall be bi-lingual to properly notify the resident population.

## B. Landscaping and Grounds

The SHA will prepare a routine maintenance schedule for the maintenance of the landscaping and grounds of its properties that will ensure their continuing attractiveness and marketability.

Routine grounds maintenance includes numerous activities:

- 1. Litter control
- 2. Lawn care
- 3. Maintenance of driveways, sidewalks and parking lots
- 4. Care of flower and shrubbery beds and trees
- 5. Maintenance of playgrounds, benches and fences
- 6. Snow removal

The AED(s) shall be responsible for the development of a routine maintenance schedule that shall include the following:

- 1. A clearly articulated standard of appearance for the grounds that acknowledges but is not limited to HUD and state/local code standards;
- 2. A list of tasks that are required to maintain that standard and the frequency with which the tasks must be performed;
- 3. The equipment, materials, and supplies required to perform the tasks and a schedule for their procurement; and
- 4. A separate snow removal plan including a schedule for preparing equipment for the season and the procurement of other necessary materials and supplies.

## C. Building Exteriors and Interior Common Areas

The appearance of the outside of SHA buildings as well as their interior common areas is important to their marketability. Therefore, the SHA has established a routine maintenance schedule to ensure that they are always maintained in good condition. The components to be maintained include:

#### 1. Lobbies

- 2. Hallways and stairwells
- 3. Elevators
- 4. Public restrooms
- 5. Lighting fixtures
- 6. Common rooms and community spaces
- 7. Exterior porches and railings
- 8. Building walls
- 9. Windows

The AED(s) are responsible for the development of a routine maintenance schedule for building exterior and interior common areas. The schedule shall be based on the following:

- 1. A clearly articulated standard of appearance for the building
- 2. A list of tasks required to maintain that standard
- 3. The frequency with which the tasks must be performed
- 4. A list of materials, equipment and supplies required to perform the tasks.
- 5. Interior Painting

The appearance and condition of the paint within each unit is important to unit condition and resident satisfaction. Accordingly, the SHA will develop a plan to ensure that interior paint in resident dwelling units is satisfactorily maintained.

As part of this plan painting standards will be developed that include:

- 1. Surface preparation
- 2. Protection of non-painted surfaces
- 3. Color and finish
- 4. Paint quality
- 5. Methods of application approved
- 6. Lead paint testing and abatement if required

The plan will set out the conditions for the consideration of a painting request. These standards include the period of time that has elapsed since the last time the unit was painted. Alternatives for performance of the work will be included including the conditions under which a resident will be allowed to paint his or her own unit.

# 2.6 Resident On-Demand Service

This category of work refers to all resident generated work requests that fall into no other category. These are non-emergency calls made by residents seeking maintenance service. These requests for service cannot be planned in advance or responded to before the resident calls.

It is the policy of the SHA to complete these work requests within seven (7) days. However, unless the request is an emergency or entails work that compromises the habitability of the unit, these requests will not be given a priority above scheduled routine and preventive maintenance. By following this procedure, the SHA believes it can achieve both good resident service and a maintenance system that completes the most important work first and in the most cost effective manner.

# 3.0 CONTRACTING FOR SERVICES

The SHA will contract for maintenance services when it is in the best interests of the SHA to do so. When the employees of the SHA have the time and skills to perform the work at hand, they will be the first choice to perform a given task. When the employees of the SHA have the skills to do the work required, but there is more work than there is time available to complete it, the SHA will determine whether it is more cost effective to use a contractor to complete the work. If the Authority staff does not have the skills to complete the work, a contractor will be chosen. In the last instance, the Authority will decide whether it will be cost effective to train a staff member to complete the work.

Once the decision has been made to hire a contractor, the process set out in the SHA Procurement Policy will be used. These procedures vary depending on the expected dollar amount of the contract. The AED(s) will work with the Procurement Department to facilitate the contract award. The AED will be responsible for the contribution of the maintenance staff to this process. The most important aspect of the bid documents will be the specifications or statement of work. The clearer the specifications the easier it will be for the SHA to get the work product it requires.

#### **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 03/31/2020. It also shows the approved budget for the current year (2021) 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, except as noted in the list of budgets below.

Budgets included in this Annual Plan:

1.Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Springfield Housing Authority, except as noted for separate budgets on the following pages.

2.Reed Village S8NCSR Units

**3.Gentile Apartments** 

**4.Scattered Site** 

#### **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 Springfield Housing Authority operating reserve at the end of fiscal year 2020 was \$0.00, which is 0% 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 Springfield Housing Authority, except as noted for separate budgets on the following pages.								
REVENUE						pageo.			
						2021			
		2020	2020 Actual	2021	% Change	Dollars			
		Approved	Amounts	Approved	from 2020	Budgeted			
Account		Revenue	Received	Revenue	Actual to	per Unit per			
Number	Account Class	Budget		Budget	2021 Budget	Month			
3110	Shelter Rent - Tenants	\$1,372,870.00	\$0.00	\$0.00	0%	\$0.00			
3111	Shelter Rent - Tenants -	\$0.00	\$0.00	\$0.00	0%	\$0.00			
	Fraud/Retroactive								
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	\$7,400.00	\$0.00	\$0.00	0%	\$0.00			
3611	Interest on Investments - Restricted	\$0.00	\$0.00	\$0.00	0%	\$0.00			
3690	Other Revenue	\$6,500.00	\$0.00	\$0.00	0%	\$0.00			
3691	Other Revenue - Retained	\$280,000.00	\$0.00	\$0.00	0%	\$0.00			
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)	\$1,169,670.00	\$0.00	\$0.00	0%	\$0.00			
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	\$2,836,440.00	\$0.00	\$0.00	0%	\$0.00			

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Springfield Housing Authority, except as noted for separate budgets on the following pages.

EXPENSES						
Account Number	Account Class	2020 Approved Expense Budget	2020 Actual Amounts Spent	2021 Approved Expense Budget	% Change from 2020 Actual to 2021 Budget.	2021 Dollars Budgeted per Unit per Month
4110	Administrative Salaries	\$412,163.00	\$0.00	\$0.00	0%	
4120	Compensated Absences	\$0.00				-
4130	Legal	\$5,800.00	\$0.00	\$0.00	0%	-
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	-
4150	Travel & Related Expenses	\$10,080.00	\$0.00	\$0.00	0%	\$0.0
4170	Accounting Services	\$0.00	\$0.00	\$0.00	0%	\$0.0
4171	Audit Costs	\$6,120.00	\$0.00	\$0.00	0%	\$0.0
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.0
4190	Administrative Other	\$166,600.00	\$0.00	\$0.00	0%	\$0.0
4191	Tenant Organization	\$500.00	\$0.00	\$0.00	0%	\$0.0
4100	TOTAL ADMINISTRATION	\$601,263.00	\$0.00	\$0.00	0%	\$0.0
4310	Water	\$167,509.00	\$0.00	\$0.00	0%	\$0.0
4320	Electricity	\$269,260.00	\$0.00	\$0.00	0%	\$0.0
4330	Gas	\$166,490.00	\$0.00	\$0.00	0%	\$0.0
4340	Fuel	\$800.00	\$0.00	\$0.00	0%	\$0.0
4360	Net Meter Utility Debit/Energy Conservation	\$0.00	\$0.00	\$0.00	0%	\$0.0
4390	Other	\$0.00	\$0.00	\$0.00	0%	\$0.0
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.0
4392	Net Meter Utility Credit (Negative Amount)	\$0.00				
4300	TOTAL UTILITIES	\$604,059.00	\$0.00	\$0.00	0%	\$0.0

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	Consolidated Budget (400-1) for a	l state-aided 667 (	Elderly), 200 (fam	nily), and 705 (scat	ttered site family	) developments
	owned by Springfield Hou	sing Authority , ex	cept as noted for	separate budgets	on the following	g pages.
EXPENSES	5					
		2020	2020 Actual	2021	% Change	2021 Dollars
		Approved	Amounts	Approved	from 2020	Budgeted per
Account		Expense	Spent	Expense	Actual to	Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
4410	Maintenance Labor	\$370,239.00	\$0.00	\$0.00	0%	\$0.00
4420	Materials & Supplies	\$111,450.00	\$0.00	\$0.00	0%	\$0.00
4430	Contract Costs	\$203,690.00	\$0.00	\$0.00	0%	\$0.00
4400	TOTAL MAINTENANCE	\$685,379.00	\$0.00	\$0.00	0%	\$0.00
4510	Insurance	\$75 <i>,</i> 670.00	\$0.00	\$0.00	0%	\$0.00
4520	Payment in Lieu of Taxes	\$3,820.00	\$0.00	\$0.00	0%	\$0.00
4540	Employee Benefits	\$494,415.00	\$0.00	\$0.00	0%	\$0.00
4541	Employee Benefits - GASB 45	\$0.00	\$0.00	\$0.00	0%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$0.00	\$0.00	0%	\$0.00
4570	Collection Loss	\$9,700.00	\$0.00	\$0.00	0%	\$0.00
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	\$583,605.00	\$0.00	\$0.00	0%	\$0.00
4610	Extraordinary Maintenance	\$0.00	\$0.00	\$0.00	0%	\$0.00
4611	Equipment Purchases - Non	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Capitalized					
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	\$0.00	\$0.00	0%	\$0.00
4600	TOTAL OTHER EXPENSES	\$0.00	\$0.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$2,474,306.00	\$0.00	\$0.00	0%	\$0.00

	Consolidated Budget (400-1) for all	state-aided 667 (	Elderly), 200 (fam	ily), and 705 (scat	tered site family	) developments				
	owned by Springfield Housing Authority, except as noted for separate budgets on the following pages.									
SUMMARY										
Account Number	Account Class	2020 Approved Budget	2020 Actual Amounts	2021 Approved Budget	% Change from 2020 Actual to 2021 Budget	2021 Dollars Budgeted per Unit per Month				
3000	TOTAL REVENUE	\$2,836,440.00	\$0.00	\$0.00	0%	\$0.00				
4000	TOTAL EXPENSES	\$2,474,306.00	\$0.00	\$0.00	0%	\$0.00				
2700	NET INCOME (DEFICIT)	\$362,134.00	\$0.00	\$0.00	0%	\$0.00				
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	\$362,134.00	\$0.00	\$0.00	0%	\$0.00				

		Reed	Village S8NCSR U	nits		
REVENUE			-		-	-
		2020		2021	% Change	2021 Dollars
		Approved	2020 Actual	Approved	from 2020	Budgeted per
Account		Revenue	Amounts	Revenue	Actual to	Unit per
Number	Account Class	Budget	Received	Budget	2021 Budget	Month
3110	Shelter Rent - Tenants	\$187,000.00	\$0.00	\$0.00	0%	\$0.00
3111	Shelter Rent - Tenants -	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Fraud/Retroactive					
3115	Shelter Rent - Federal Section 8	\$262,016.00	\$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 -	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Unrestricted					
3611	Interest on Investments - Restricted	\$4,160.00	\$0.00	\$0.00	0%	\$0.00
3690	Other Revenue	\$0.00	\$0.00	\$0.00	0%	\$0.00
3691	Other Revenue - Retained	\$0.00	\$0.00	\$0.00	0%	\$0.00
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)	\$0.00	\$0.00	\$0.00	0%	\$0.00
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	\$453,176.00	\$0.00	\$0.00	0%	\$0.00

	Reed Village S8NCSR Units								
EXPENSES	5		_	-	-				
		2020	2020 Actual	2021	% Change	2021 Dollars			
		Approved	Amounts	Approved	from 2020	Budgeted per			
Account		Expense	Spent	Expense	Actual to	Unit per			
Number	Account Class	Budget		Budget	2021 Budget	Month			
4110	Administrative Salaries	\$41,291.00	\$0.00	\$0.00	0%	\$0.00			
4120	Compensated Absences	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4130	Legal	\$1,000.00	\$0.00	\$0.00	0%	\$0.00			
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4150	Travel & Related Expenses	\$1,000.00	\$0.00	\$0.00	0%	\$0.00			
4170	Accounting Services	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4171	Audit Costs	\$920.00	\$0.00	\$0.00	0%	\$0.00			
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4190	Administrative Other	\$17,570.00	\$0.00	\$0.00	0%	\$0.00			
4191	Tenant Organization	\$150.00	\$0.00	\$0.00	0%	\$0.00			
4100	TOTAL ADMINISTRATION	\$61,950.00	\$0.00	\$0.00	0%	\$0.00			
4310	Water	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4320	Electricity	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4330	Gas	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4340	Fuel	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4360	Net Meter Utility Debit/Energy	\$0.00	\$0.00	\$0.00	0%	\$0.00			
	Conservation								
4390	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4392	Net Meter Utility Credit (Negative	\$0.00	\$0.00	\$0.00	0%	\$0.00			
	Amount)								
4300	TOTAL UTILITIES	\$0.00	\$0.00	\$0.00	0%	\$0.00			

		Reed '	Village S8NCSR U	nits		
EXPENSES	i					
Account	Account Class	2020 Approved Expense Budget	2020 Actual Amounts Spent	2021 Approved Expense Budget	% Change from 2020 Actual to 2021 Spent	2021 Dollars Budgeted per Unit per Month
Number	Maintenance Labor	\$77,826.00	\$0.00	-	•	\$0.00
4410 4420	Materials & Supplies	\$15,000.00	\$0.00 \$0.00			
4430	Contract Costs	\$14,720.00	\$0.00	\$0.00	0%	\$0.00
4400	TOTAL MAINTENANCE	\$107,546.00	\$0.00	\$0.00	0%	\$0.00
4510	Insurance	\$10,090.00	\$0.00	\$0.00	0%	\$0.00
4520	Payment in Lieu of Taxes	\$1,800.00	\$0.00	\$0.00	0%	\$0.00
4540	Employee Benefits	\$73,502.00	\$0.00	\$0.00	0%	\$0.00
4541	Employee Benefits - GASB 45	\$0.00	\$0.00	\$0.00	0%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$0.00	\$0.00	0%	\$0.00
4570	Collection Loss	\$658.00	\$0.00	\$0.00	0%	\$0.00
4571	Collection Loss - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
4580	Interest Expense	\$10,280.00	\$0.00	\$0.00	0%	\$0.00
4590	Other General Expense	\$0.00	\$0.00	\$0.00	0%	\$0.00
4500	TOTAL GENERAL EXPENSES	\$96,330.00	\$0.00	\$0.00	0%	\$0.00
4610	Extraordinary Maintenance	\$0.00	\$0.00	\$0.00	0%	\$0.00
4611	Equipment Purchases - Non Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00
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	\$0.00	\$0.00	0%	\$0.00
4600	TOTAL OTHER EXPENSES	\$0.00	\$0.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$265,826.00	\$0.00	\$0.00	0%	\$0.00

	Reed Village S8NCSR Units								
SUMMARY									
						2021			
					% Change	Dollars			
		2020	2020 Actual	2021	from 2020	Budgeted			
Account		Approved	Amounts	Approved	Actual to	per Unit per			
Number	Account Class	Budget		Budget	2021 Budget	Month			
3000	TOTAL REVENUE	\$453,176.00	\$0.00	\$0.00	0%	\$0.00			
4000	TOTAL EXPENSES	\$265,826.00	\$0.00	\$0.00	0%	\$0.00			
2700	NET INCOME (DEFICIT)	\$187,350.00	\$0.00	\$0.00	0%	\$0.00			
7520	Replacements of Equip Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00			
7540	Betterments & Additions - Capitalized	\$300,000.00	\$0.00	\$0.00	0%	\$0.00			
7500	TOTAL NONOPERATING	\$0.00	\$0.00	\$0.00	0%	\$0.00			
	EXPENDITURES								
7600	EXCESS REVENUE OVER EXPENSES	\$187,350.00	\$0.00	\$0.00	0%	\$0.00			

		Ge	ntile Apartments			
REVENUE						
						2021
		2020	2020 Actual	2021	% Change	Dollars
		Approved	Amounts	Approved	from 2020	Budgeted
Account		Revenue	Received	Revenue	Actual to	per Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
3110	Shelter Rent - Tenants	\$341,400.00	\$0.00	\$0.00	0%	\$0.00
3111	Shelter Rent - Tenants -	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Fraud/Retroactive					
3115	Shelter Rent - Federal Section 8	\$460,884.00	\$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 -	\$2,780.00	\$0.00	\$0.00	0%	\$0.00
	Unrestricted					
3611	Interest on Investments - Restricted	\$0.00	\$0.00	\$0.00	0%	\$0.00
3690	Other Revenue	\$4,000.00	\$0.00	\$0.00	0%	\$0.00
3691	Other Revenue - Retained	\$0.00	\$0.00	\$0.00	0%	\$0.00
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)	\$0.00	\$0.00	\$0.00	0%	\$0.00
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	\$809,064.00	\$0.00	\$0.00	0%	\$0.00

	Gentile Apartments								
EXPENSES									
						2021			
		2020	2020 Actual	2021	% Change	Dollars			
		Approved	Amounts	Approved	from 2020	Budgeted			
Account		Expense	Spent	Expense	Actual to	per Unit per			
Number	Account Class	Budget		Budget	2021 Budget	Month			
4110	Administrative Salaries	\$115,677.00	\$0.00	\$0.00	0%	\$0.00			
4120	Compensated Absences	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4130	Legal	\$10,000.00	\$0.00	\$0.00	0%	\$0.00			
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4150	Travel & Related Expenses	\$3,300.00	\$0.00	\$0.00	0%	\$0.00			
4170	Accounting Services	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4171	Audit Costs	\$1,700.00	\$0.00	\$0.00	0%	\$0.00			
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4190	Administrative Other	\$47,090.00	\$0.00	\$0.00	0%	\$0.00			
4191	Tenant Organization	\$700.00	\$0.00	\$0.00	0%	\$0.00			
4100	TOTAL ADMINISTRATION	\$178,507.00	\$0.00	\$0.00	0%	\$0.00			
4310	Water	\$51,781.00	\$0.00	\$0.00	0%	\$0.00			
4320	Electricity	\$60,357.00	\$0.00	\$0.00	0%	\$0.00			
4330	Gas	\$45,885.00	\$0.00	\$0.00	0%	\$0.00			
4340	Fuel	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4360	Net Meter Utility Debit/Energy	\$0.00	\$0.00	\$0.00	0%	\$0.00			
	Conservation								
4390	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.00			
4392	Net Meter Utility Credit (Negative	\$0.00	\$0.00	\$0.00	0%	\$0.00			
	Amount)								
4300	TOTAL UTILITIES	\$158,023.00	\$0.00	\$0.00	0%	\$0.00			

		Ge	ntile Apartments			
EXPENSES	6					
						2021
		2020	2020 Actual	2021	% Change	Dollars
		Approved	Amounts	Approved	from 2020	Budgeted
Account		Expense	Spent	Expense	Actual to	per Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
4410	Maintenance Labor	\$102,673.00	\$0.00	\$0.00	0%	\$0.00
4420	Materials & Supplies	\$28,200.00	\$0.00	\$0.00	0%	\$0.00
4430	Contract Costs	\$66,030.00	\$0.00	\$0.00	0%	\$0.00
4400	TOTAL MAINTENANCE	\$196,905.00	\$0.00	\$0.00	0%	\$0.00
4510	Insurance	\$20,350.00	\$0.00	\$0.00	0%	\$0.00
4520	Payment in Lieu of Taxes	\$0.00	\$0.00	\$0.00	0%	\$0.00
4540	Employee Benefits	\$136,686.00	\$0.00	\$0.00	0%	\$0.00
4541	Employee Benefits - GASB 45	\$0.00	\$0.00	\$0.00	0%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$0.00	\$0.00	0%	\$0.00
4570	Collection Loss	\$2,498.00	\$0.00	\$0.00	0%	\$0.00
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	\$159,536.00	\$0.00	\$0.00	0%	\$0.00
4610	Extraordinary Maintenance	\$0.00	\$0.00	\$0.00	0%	\$0.00
4611	Equipment Purchases - Non	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Capitalized					
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	\$0.00	\$0.00	0%	\$0.00
4600	TOTAL OTHER EXPENSES	\$0.00	\$0.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$692,971.00	\$0.00	\$0.00	0%	\$0.00

		Gentile Apartments								
SUMMAR	SUMMARY									
Account Number	Account Class	2020 Approved Budget	Amounts	2021 Approved Budget	from 2020 Actual to	2021 Dollars Budgeted per Unit per Month				
3000	TOTAL REVENUE	\$809,064.00		-						
4000	TOTAL EXPENSES	\$692,971.00		-						
2700	NET INCOME (DEFICIT)	\$116,093.00	\$0.00	\$0.00	0%	\$0.00				
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	\$116,093.00	\$0.00	\$0.00	0%	\$0.00				

	Scattered Site					
REVENUE						
						2021
		2020	2020 Actual	2021	% Change	Dollars
		Approved	Amounts	Approved	from 2020	Budgeted
Account		Revenue	Received	Revenue	Actual to	per Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
3110	Shelter Rent - Tenants	\$89,000.00	\$0.00	\$0.00	0%	\$0.00
3111	Shelter Rent - Tenants -	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Fraud/Retroactive					
3115	Shelter Rent - Federal Section 8	\$82,948.00	\$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 -	\$3,280.00	\$0.00	\$0.00	0%	\$0.00
	Unrestricted					
3611	Interest on Investments - Restricted	\$0.00	\$0.00	\$0.00	0%	\$0.00
3690	Other Revenue	\$0.00	\$0.00	\$0.00	0%	\$0.00
3691	Other Revenue - Retained	\$0.00	\$0.00	\$0.00	0%	\$0.00
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)	\$0.00	\$0.00	\$0.00	0%	\$0.00
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	\$175,228.00	\$0.00	\$0.00	0%	\$0.00

	Scattered Site					
EXPENSES						
						2021
		2020	2020 Actual	2021	% Change	Dollars
		Approved	Amounts	Approved	from 2020	Budgeted
Account		Revenue	Spent	Expense	Actual to	per Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
4110	Administrative Salaries	\$10,352.00	\$0.00	\$0.00	0%	\$0.00
4120	Compensated Absences	\$0.00	\$0.00	\$0.00	0%	\$0.00
4130	Legal	\$3,500.00	\$0.00	\$0.00	0%	\$0.00
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4150	Travel & Related Expenses	\$299.00	\$0.00	\$0.00	0%	\$0.00
4170	Accounting Services	\$0.00	\$0.00	\$0.00	0%	\$0.00
4171	Audit Costs	\$300.00	\$0.00	\$0.00	0%	\$0.00
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.00
4190	Administrative Other	\$8,070.00	\$0.00	\$0.00	0%	\$0.00
4191	Tenant Organization	\$0.00	\$0.00	\$0.00	0%	\$0.00
4100	TOTAL ADMINISTRATION	\$22,528.00	\$0.00	\$0.00	0%	\$0.00
4310	Water	\$13,770.00	\$0.00	\$0.00	0%	\$0.00
4320	Electricity	\$271.00	\$0.00	\$0.00	0%	\$0.00
4330	Gas	\$18,763.00	\$0.00	\$0.00	0%	\$0.00
4340	Fuel	\$0.00	\$0.00	\$0.00	0%	\$0.00
4360	Net Meter Utility Debit/Energy	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Conservation					
4390	Other	\$0.00	\$0.00	\$0.00	0%	\$0.00
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.00
4392	Net Meter Utility Credit (Negative	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Amount)					
4300	TOTAL UTILITIES	\$32,803.00	\$0.00	\$0.00	0%	\$0.00

	Scattered Site					
EXPENSES						
						2021
		2020	2020 Actual	2021	% Change	Dollars
		Approved	Amounts	Approved	from 2020	Budgeted
Account		Expense	Spent	Expense	Actual to	per Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
4410	Maintenance Labor	\$15,615.00	\$0.00	\$0.00	0%	\$0.00
4420	Materials & Supplies	\$17,000.00	\$0.00	\$0.00	0%	\$0.00
4430	Contract Costs	\$13,060.00	\$0.00	\$0.00	0%	\$0.00
4400	TOTAL MAINTENANCE	\$45,675.00	\$0.00	\$0.00	0%	\$0.00
4510	Insurance	\$3,140.00	\$0.00	\$0.00	0%	\$0.00
4520	Payment in Lieu of Taxes	\$2,010.00	\$0.00	\$0.00	0%	\$0.00
4540	Employee Benefits	\$16,807.00	\$0.00	\$0.00	0%	\$0.00
4541	Employee Benefits - GASB 45	\$0.00	\$0.00	\$0.00	0%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$0.00	\$0.00	0%	\$0.00
4570	Collection Loss	\$300.00	\$0.00	\$0.00	0%	\$0.00
4571	Collection Loss - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
4580	Interest Expense	\$11,510.00	\$0.00	\$0.00	0%	\$0.00
4590	Other General Expense	\$0.00	\$0.00	\$0.00	0%	\$0.00
4500	TOTAL GENERAL EXPENSES	\$33,767.00	\$0.00	\$0.00	0%	\$0.00
4610	Extraordinary Maintenance	\$0.00	\$0.00	\$0.00	0%	\$0.00
4611	Equipment Purchases - Non	\$0.00	\$0.00	\$0.00	0%	\$0.00
	Capitalized					
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	\$0.00	\$0.00	0%	\$0.00
4600	TOTAL OTHER EXPENSES	\$0.00	\$0.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$134,773.00	\$0.00	\$0.00	0%	\$0.00

	Scattered Site					
SUMMAR	(					
						2021
					% Change	Dollars
		2020	2020 Actual	2021	from 2020	Budgeted
Account		Approved	Amounts	Approved	Actual to	per Unit per
Number	Account Class	Budget		Budget	2021 Budget	Month
3000	TOTAL REVENUE	\$175,228.00	\$0.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$134,773.00	\$0.00	\$0.00	0%	\$0.00
2700	NET INCOME (DEFICIT)	\$40,455.00	\$0.00	\$0.00	0%	\$0.00
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	\$0.00	\$0.00	\$0.00	0%	\$0.00
	EXPENDITURES					
7600	EXCESS REVENUE OVER EXPENSES	\$40,455.00	\$0.00	\$0.00	0%	\$0.00

#### **Explanation of Budget Accounts**

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

<u>3110:</u> 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.

<u>3111: Shelter Rent – Tenants - Fraud/Retroactive</u>: 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 repayment 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.

<u>3115: Shelter Rent - Section 8</u>: 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.

<u>3190: Non-Dwelling Rental:</u> 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.

<u>3400: Administrative Fee- MRVP/AHVP</u>: 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.

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

<u>3611:</u> 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.

<u>3690:</u> 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.

<u>3691: Other Revenue – Retained</u>: This account should be credited with certain miscellaneous revenue to be <u>retained</u> 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.

<u>3692: Other Revenue - Operating Reserves:</u> 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.

<u>3693: Other Revenue – Net Meter:</u> 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

<u>3801:</u> 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.

#### <u>3802: Operating Subsidy – MRVP/AHVP Landlords:</u>

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.

<u>3920:</u> 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 properly that has not been fully depreciated.

<u>4110:</u> 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.

<u>4120: Compensated Absences:</u> 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.).

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

<u>4140: Compensation to Authority Members:</u> 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.

<u>4150:</u> 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.

<u>4170: Contractual Accounting Services:</u> 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.

<u>4171:</u> 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.

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

<u>4190: Administrative Other</u>: 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.

<u>4191: Tenant Organization: LTO Funding by the LHA</u>. 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.

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

<u>4320: Electricity</u>: 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 electricitygenerating 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.

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

<u>4340:</u> 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.

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

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

<u>4391: Solar Operator Costs:</u> 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.

<u>4392: Net Meter Utility Credit (Negative Amount):</u> 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.

<u>4410:</u> 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.

<u>4420:</u> 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.

<u>4430: Contract Costs:</u> 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.

<u>4510:</u> 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.

<u>4540:</u> 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.

<u>4541: Employee Benefits - GASB 45: This line covers "</u>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.

<u>4542: Pension Expense – GASB 68:</u> 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.

<u>4570:</u> 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.

<u>4571: Collection Loss – Fraud/Retroactive:</u> 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.

<u>4580:</u> 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.

<u>4590:</u> 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.

<u>4610:</u> 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.

<u>4611: Equipment Purchases – Non-Capitalized:</u> 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.

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

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

<u>7520:</u> 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.

<u>7540:</u> 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.

#### PMR Narrative Responses

## Narrative Responses to the Performance Management Review (PMR) Findings

DHCD has cancelled publication of Performance Management Reviews for fiscal years ending 3/31/2020 through 12/31/2020 due to disruptions of normal operations in response to the COVID-19 virus. Therefore, there are no ratings included in this report.

# Explanation of PMR Criteria Ratings

CRITERION	DESCRIPTION
Management	
Occupancy Rate	<ul> <li>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)</li> <li>"No Findings": Occupancy Rate is at or above 98%</li> <li>Operational Guidance: Occupancy rate is at 95% up to 97.9%</li> <li>Corrective Action: Adjusted occupancy rate is less than 95%</li> </ul>
Tenant Accounts Receivable (TAR)	<ul> <li>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)</li> <li>"No Findings" : At or below 2%</li> <li>"Operational Guidance": More than 2% , but less than 5%</li> <li>"Corrective Action": 5% or more</li> </ul>
Certifications and Reporting Submissions	<ul> <li>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.</li> <li>"No Findings": At least 11 of the required 12 reports were submitted and at least 9 were submitted on time.</li> <li>"Operational Guidance": Less than 11 of the required 12 reports were submitted and/or less than 9 were submitted on time.</li> </ul>
Board Member Training	<ul> <li>Percentage of board members that have completed the mandatory online board member training.</li> <li>"No Findings": 80% or more completed training</li> <li>"Operational Guidance": 60-79.9% completed training</li> <li>"Corrective Action": &lt;60 % completed training</li> </ul>

CRITERION	DESCRIPTION
Financial	
Adjusted Net Income	The Adjusted Net Income criterion calculation starts with an LHA's Net Income and subtracts Depreciation, GASB 45 (Retirement Costs), GASB 68 (Retirement Costs), Extraordinary Maintenance (maintenance expense outside of routine/ordinary expenses), and Equipment Purchases – Non Capitalized. This Adjusted Net Income amount is then divided by the Total Expenses of the LHA. If this Adjusted Net Income amount is positive, it means underspending and if it is negative it means overspending. Underspending Rating: • "No Findings" : 0 to 9.9% • "Operational Guidance": 10 to 14.9% • "Corrective Action": 15% or higher Overspending Rating: • "No Findings" : 0 to -4.9% • "Operational Guidance": -5% to -9.9% • "Corrective Action": -10% or below
Operating Reserves	Current Operating Reserve as a percentage of total maximum reserve level. Appropriate reserve level is buffer against any unforeseen events or expenditures. • "No Findings" :35%+ of maximum operating reserve • "Operational Guidance": 20% to 34.9% of maximum operating reserve • "Corrective Action": <20% of maximum operating reserve
Capital Planning	
Capital Improvement Plan (CIP) Submitted	<ul> <li>Housing authorities are required to submit a five-year capital plan every year.</li> <li>"No Findings" =Submitted on time and no modifications required or modifications made within 45 days.</li> <li>"Operational Guidance" =Up to 45 days late and no modifications required or modifications made within 45 days.</li> <li>"Corrective Action" =More than 45 days late or modifications required and not completed within 45 days.</li> </ul>
Capital Spending	<ul> <li>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</li> <li>"No Findings" = at least 80%</li> <li>"Operational Guidance" = At least 50%</li> <li>"Corrective Action" = Less than 50%</li> </ul>

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	<ul> <li>Housing authorities are required to conduct inspections of all their occupied units at least once a year</li> <li>"No Findings": 100 % of sampled units had inspections conducted once during the year</li> <li>"Corrective Action": Fewer than 100% of sample units were inspected during the year</li> </ul>
Inspections Report	<ul> <li>Housing authorities are required to note all of the deficiencies found during inspections</li> <li>"No Findings": 100 % of deficiencies are noted on inspection report</li> <li>"Corrective Action": Fewer than 100% of deficiencies are noted in inspection report</li> </ul>
Inspection Work Order	<ul> <li>Housing authorities are required to generate work orders for all deficiencies noted during inspections</li> <li>"No Findings": 100 % of deficiencies noted on inspection reports generated work orders</li> <li>"Corrective Action": Fewer than 100% of deficiencies noted on inspection reports generated work orders</li> </ul>
Work Order System	<ul> <li>Work order system identifies, tracks, and can produce reports for inspection work orders.</li> <li>"No Findings": Inspection work orders are identified, tracked, and reportable</li> <li>"Operational Guidance": Inspection work orders are not identified, and/or tracked, and/or reportable</li> </ul>
Inspections Work Orders Completed	<ul> <li>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).</li> <li>"No Findings": Sampled inspection work orders were completed within 30 days of inspection date or added to deferred maintenance plan and/or CIP</li> <li>"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</li> <li>"Corrective Action": Sampled inspection work orders were completed in over 45 calendar days of inspection date</li> </ul>

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

CRITERION	DESCRIPTION
Requested Work	Requested work orders should be identified, tracked and reportable.
Orders	<ul> <li>"No Findings": Requested work orders identified, tracked, reportable and completed regularly</li> </ul>
	• "Operational Guidance": Requested work orders are not identified and/or tracked and/or reportable, and or completed regularly
Requested Work	Requested work orders should be completed in 14 calendar days from the
Orders Completion	<ul> <li>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.</li> <li>"No Findings": Requested work orders are completed within 14 calendar days of tenant request OR added to deferred maintenance plan and/or CIP</li> <li>"Operational Guidance": Requested work orders are completed within 15-30 calendar days from the date of tenant request</li> <li>"Corrective Action": Requested work orders are completed in over 30 calendar days from the date of tenant request OR not completed</li> </ul>
Emergency Response System	<ul> <li>Housing authorities should have a 24 Hour Emergency Response System and distribute Emergency Definition to Residents, Staff, and Answering Service (if applicable).</li> <li>"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</li> <li>"Operational Guidance": System exists, but no definition has been distributed</li> <li>"Corrective Action": Neither a system nor distributed definitions exist</li> </ul>

## **Policies**

The following policies are currently in force at the Springfield Housing Authority:

Policy	Last Ratified by Board Vote	Notes
*Rent Collection Policy	04/08/2007	
*Personnel Policy	04/17/2018	
*Capitalization Policy	06/29/2010	
*Procurement Policy	05/20/2019	
*Grievance Policy	04/08/2007	

\* 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.

## <u>Waivers</u>

AP-2022-Springfield Housing Autho-00168 has no current waivers from the regulations of the Department of Housing and Community Development (DHCD).

#### Glossary

- **ADA**: Americans with Disabilities Act. Often used as shorthand for accessibility related issues or improvements.
- AHVP: Alternative Housing Voucher Program
- Alternative Housing Voucher Program provides rental vouchers to disabled applicants who are not elderly and who have been determined eligible for Chapter 667 (elderly and disabled) housing.
- Allowable Non-Utility Expense Level (ANUEL) is the amount of non-utility expense allowed for each local housing authority based upon the type(s) of housing programs administered.
- ANUEL: Allowable Non-Utility Expense Level
- AP: Annual Plan
- Annual Plan: A document prepared by each Local Housing Authority, incorporating the Capital Improvement Plan (CIP), Maintenance and Repair Plan, Budget, responses to the Performance Management Review, and other elements.
- Cap Share is the amount of Formula Funding spending approved by DHCD for each year.
- **Capital Funds**: Funds provided by DHCD to an LHA for the modernization and preservation of state-aided public housing, including Formula Funds and Special Capital Funds.
- **Capital Needs Assessment**, similar to the CIP, often used for developments in the Section 8 New Construction/Substantial Rehabilitation program. Such developments are generally not eligible for state capital funds and therefore do not participate in the CIP process. However, to track their ongoing capital needs and plan for construction projects to address those needs, they often conduct a CNA to determine when building systems will wear out and need to be replaced, and what replacement will cost, so they can plan the ensure that the necessary funding will be available
- **Capital Projects** are projects that add significant value to an asset or replace building systems or components. Project cost must be greater than \$1000.
- **CIMS** is a web-based software system used for creating CIP's and Annual Plans. For the CIP, the CIMS program allows the LHA to prioritize, select and schedule projects, assign funding sources and direct project spending to specific fiscal years to create a CIP that is consistent with the LHA's FF award amount and FF cap shares, plus any additional funding resources the LHA has identified. The LHA submits its CIP and DHCD conducts its review of the LHA's CIP in CIMS. For the Annual Plan CIMS imports data from other DHCD systems and combines that with data entered by the LHA.
- **CIP**: A Capital Improvement Plan (CIP) is a five (5) 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 contents of a CIP are limited to available resources. An approved CIP is required in order to receive Formula Funds.
- **CNA:** Capital Needs Assessment

- **CPS** is DHCD's transparent Web-based capital planning system that catalogues the condition of every building and site in the statewide public housing portfolio, providing LHAs with detailed technical information to make strategic long-term capital investments. It includes a Facility Condition Index (FCI) for every development that compares the value of expired components of a development relative to its replacement cost.
- **Deferred Maintenance** is maintenance, upgrades, or repairs that are deferred to a future budget cycle or postponed for some other reason. Sometimes it is referred to as extraordinary maintenance.
- **Deficit housing authority:** a housing authority whose income (mainly from rent) does not cover all its normal operating costs in its approved operating budget, and which therefore operates at a deficit and requires operating subsidy from DHCD.
- DHCD: Massachusetts Department of Housing & Community Development
- **Extraordinary Maintenance**: see the description for budget line 4610 in the Explanation of Budget Accounts in the Budget Section of this Annual Plan.
- **FF**: Formula Funding
- **Formula Funding** is state bond funding allocated to each LHA according to the condition (needs) of its portfolio in comparison to the entire state-aided public housing portfolio.
- FYE: Fiscal Year End
- **HHA Administrative Fee** is the fee paid to an HHA from the RCAT Program budget.
- **HHA**: Host Housing Authority for the RCAT program.

Host Housing Authority (HHA). An LHA selected by the Department to employ and oversee an RCAT.

- HUD: U.S. Department of Housing and Urban Development
- LHA: Local Housing Authority
- LTO: Local Tenants Organization
- Management and Occupancy Report: This is an annual HUD review process that is used to evaluate the performance of developments in various HUD housing programs, including the Section 8 New Construction/Substantial Rehabilitation program, which some LHAs operate. It is similar to the state PMR process in that it evaluates LHA performance on variety of financial, housing quality, and other standards
- Massachusetts Rental Voucher Program (MRVP) is a state-funded program that provides rental subsidies to low-income families and individuals.
- MOR: Management and Occupancy Report
- **MRVP**: Massachusetts Rental V DHCD's annual review of each housing authority's performance. It pulls together data on the authority's occupancy rates, tenant accounts receivables, accounts payable, budget variance, operating reserve, capital improvement plan submission, capital spending, annual inspections and work order and maintenance systems to identify and address areas of strength and areas for development. Its goal is to allow DHCD and the LHA to

take a deep dive into the data, lift up best practices, and work together towards improving operations oucher Program.

#### Performance Management Review (PMR):

- **PMR**: Performance Management Review
- **RCAT**: Regional Capital Assistance Team
- **Regional Capital Assistance Team**: One of three organizations employed at HHAs designated by the Department to carry out the RCAT Program.
- Sec.8 NC/SR (or S8NCSR): Section 8 New Construction and Substantial Rehabilitation
- Section 8 New Construction and Substantial Rehabilitation (Sec.8 NC/SR): This term refers to a federal HUD housing program operated at a small number of state public housing developments whose construction was funded by state grants, but whose ongoing operating costs are supported by project-based subsidies from HUD's federal Section 8 program, rather than from state public housing operating funds..
- **Special Awards**: In addition to allocations to each LHA, DHCD has created limited set aside funds to provide for extreme emergency or code compliance needs which are beyond the capacity of an LHA's current FF balance.
- **Surplus housing authority:** a housing authority whose income (mainly from rent) covers all its normal operating costs in its approved operating budget, and which therefore operates at a surplus and does not require operating subsidy from 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.

- Substantial Comments
- Cover sheet for tenant satisfaction surveys
- Tenant Satisfaction Survey 667only
- MOR Report 016
- MO Report 045
- MOR Report 058
- MOR Response

We had our Annual Plan Hearing on Dec. 15<sup>th</sup>, 2020. There were no Substantial Comments.

Denise R. Jordan

**Executive Director** 

#### **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.
- 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.

## **Springfield Housing Authority** Chapter 667 Housing Fall 2019

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

In the Fall of 2019, surveys were sent to 7172 housing units (Chapter 667). 3421 surveys were filled out and returned.

In the **Springfield Housing Authority**, surveys were sent to a total of **200** Springfield housing units (Chapter 667); **67** surveys were completed.

This report provides some information about how the residents from the **Springfield Housing Authority** who answered the survey responded. It compares their answers to those from residents in the entire state.

# Communication

• **Communication with management:** Residents were asked about how they interacted with their Housing Authorities in this peer group in the last 12 months. The table below shows what percentage of residents said they did each of the following:

	Springfield Housing Authority	Entire State
Felt they were usually or always treated with courtesy and respect when they contacted management	83%	87%
Knew the Executive Director held a meeting with residents	45%	54%

# **Maintenance and Repair**

• **Communication with maintenance staff:** Residents were asked about their interactions with the Springfield Housing Authority maintenance staff in the last 12 months.

	Springfield Housing Authority	Entire State
Felt they were treated with courtesy and respect when they contacted maintenance	82%	89%
Were contacted by the Housing Authority before entering their apartment	95%	92%

• **Overall maintenance** Respondents were asked how they would they rate overall building maintenance (such as clean halls and stairways and having lights and elevators that work) and outdoor space maintenance (such as litter removal and clear walkways) in the last 12 months.

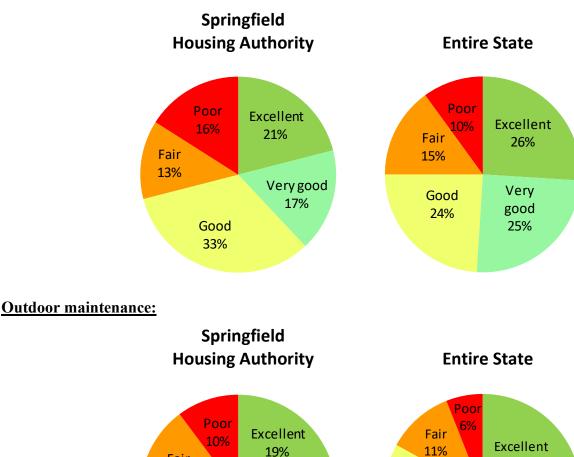
### **Building maintenance:**

Fair

16%

Good

31%



Very good

22%

32%

Very

good

28%

Good

23%

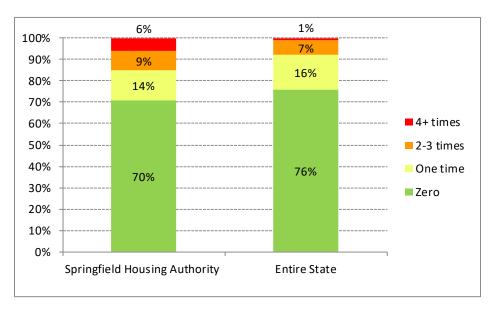
• Heating and Water Problems: A little less than a half of respondents had a problem with their heating and over a half had a plumbing problem in the last 12 months.

	Springfield Housing Authority	Entire State
Had any heating problem	46%	40%
Had any water problem	58%	57%

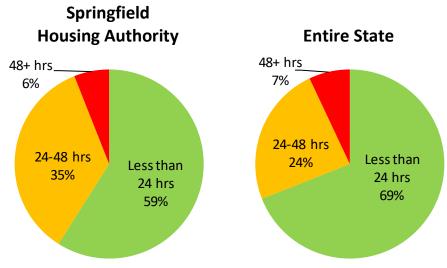
### • Heating Problems

#### How many times did residents completely lose heat?

The chart below shows how many times respondents had completely lost heat 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.



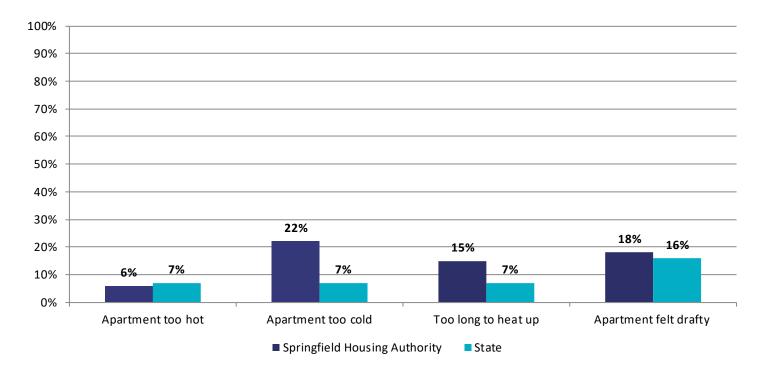
**How long did it usually take for heat to come back on?** For those respondents who reported completely losing heat, we asked how long it usually took for the heat to come back on – less than 24 hours, 24 - 48 hours, or more than 48 hours.



### • Other Heating Problems

#### In the last 12 months did residents have other heating problems?

The chart below shows what percentage of residents experienced other heating problems in the last 12 months.



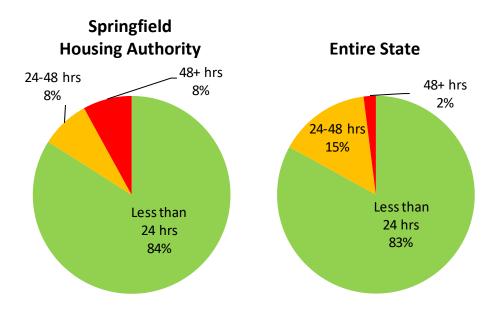
### • Water or Plumbing Problems

#### How many times did residents have no hot water in their apartment?

The chart below shows how many times respondents did not have no hot water in their apartment 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.



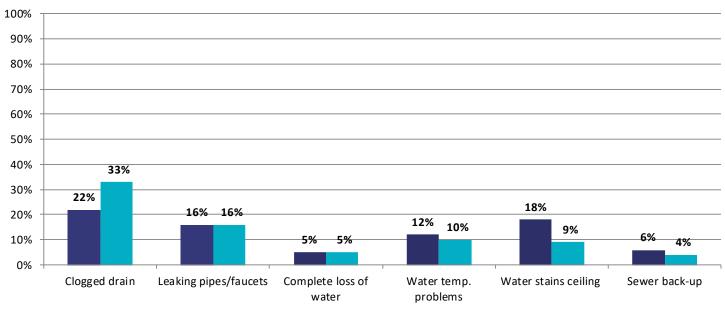
How long did it usually take for hot water to come back on? For those respondents who reported not having hot water in their apartment, we asked how long it usually took for hot water to come back on – less than 24 hours, 24 - 48 hours, or more than 48 hours.



#### • Other Water or Plumbing Problems

#### In the last 12 months did residents have other water or plumbing problems?

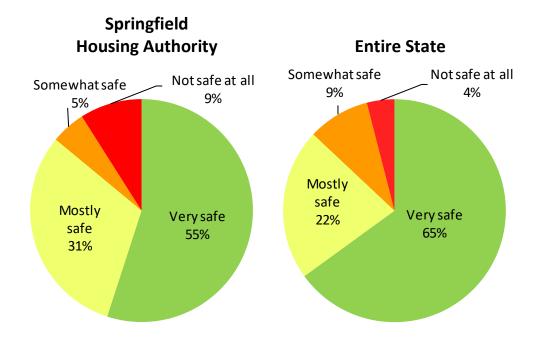
The chart below shows how many times respondents had other water or plumbing problems in the last 12 months.



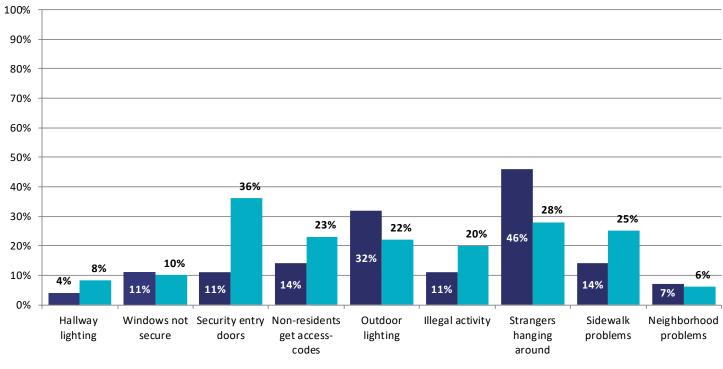
Springfield Housing Authority State

# Safety

Respondents were asked how safe they felt in their development. The charts below show what percentage of residents said they felt "very safe", "mostly" safe, "somewhat safe", or "not safe at all" in their development in the last 12 months.

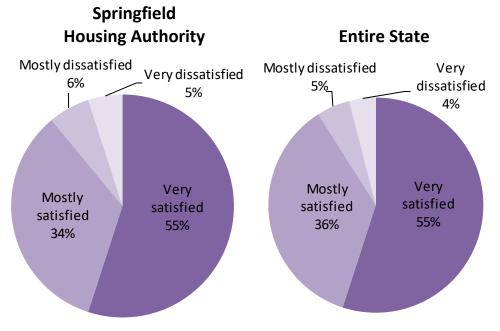


Reasons why respondents felt unsafe in their development: Respondents were asked why they felt unsafe in their development. This chart shows what specific concerns respondents mentioned.



Springfield Housing Authority State

**Respondents were asked about their overall satisfaction living in their development**. The chart below shows what percentage of people said they were "very satisfied", "mostly satisfied", "mostly dissatisfied", or "very dissatisfied".





# Commonwealth of Massachusetts DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Charles D. Baker, Governor 🔶 Karyn E. Polito, Lt. Governor 🔶 Jennifer D. Maddox, Acting Undersecretary

April 5, 2019

Denise Jordan Executive Director Springfield Housing Authority 60 Congress Street Po Box 1609 Springfield, MA 01104-1609

## Re: Management and Occupancy Review Report for Project # MA06H052016

Dear Ms. Jordan:

The enclosed report reflects the results of the Management and Occupancy Review (MOR) of the above development, conducted by the Department of Housing and Community Development (DHCD) on December 20<sup>th</sup> and 21<sup>st</sup>, 2018. The MOR is conducted to determine compliance with HUD's regulations and the owner's established management procedures and practices under the Section 8 New Construction / Substantial Rehabilitation Program. The review resulted in the following ratings:

#### Category

General Appearance and Security Follow-up & Monitoring of Project Inspections Maintenance/Operating Procedures Financial Management Leasing & Occupancy Tenant/Management Relations General Management Practices **Overall Rating** 

#### Rating

Above Average Above Average Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory

The deficiencies cited in the enclosed report need to be addressed in accordance with the respective corrective actions within 30 calendar days. If additional time is needed, please submit a corrective action plan within the 30 calendar days. The corrective action plan must identify a timeframe when the deficiencies will be resolved and how and what systems, controls, policies and procedures will be adjusted or changed to assure that the error does not reoccur. The corrective action plan will be monitored by DHCD until all deficiencies have been addressed. If you have any questions regarding this report please feel free to contact me at 617-573-1288.

Sincerely

Lisa M. Taylor Housing Management Specialist

cc. Laura Taylor, Director, Bureau of Housing Management



#### **Management Review for Multifamily Housing Projects**

U.S. Department of Housing and Urban Development Office of Housing - Federal Housing Commissioner

OMB Approval No. 2502-0178 Exp. 04/30/2018

Summary

Date of On-Site Review:	Date of Report:	Project Number:	····	Contract Number:
02/15/2018-02/16/2018	04/05/2019			MA06H052016
Section of the Act:	Name of Owner:	Project Name:		Project Address:
	Springfield Housing Authority	Gentile Apartments		85 William Street; Springfield MA
Loan Status:	Contract Administrator:	Type of Subsidy:	····	Type of Housing:
Insured HUD-Held Non-Insured Co-Insured	☐ HUD Ø CA ☐ PBCA	☑ Section 8 □ PAC □ Section 236 □ Section 221(d)(3) BMIR	Rent Supplement     RAP     PRAC     Unsubsidized	□ Family ☑ Disabled ☑ Elderly □ ElderlyDisabled. □ Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

	1 I I I I I I I I I I I I I I I I I I I		
			If this Section was not reviewed, enter 0. 86 is 10% of the overall score.
		_ <u>_</u>	This category is rated 9
	· · · · · · · · · · · · · · · · · · ·		5.
A	С	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating
			If this Section was not reviewed, enter 0.
1 124			84 is 10% of the overall score.
			This category is rated 9
		TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedure:
			Rating.
			If this Section was not reviewed, enter 0.
			75 is 10% of the overall score.
			This category is rated 8
		TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating.
A A			If this Section was not reviewed, enter 0.
-			75 is 25% of the overall score.
			This category is rated 10
		+	
		1	_
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		TON	Fature areas between 1 and 100 family family and 0 areas Date
A .	L.	100	Enter a score between 1 and 100 for the <i>Leasing and Occupancy Rating.</i> If this Section was not reviewed, enter 0.
		· · · · ·	70 is 25% of the overall score.
			This category is rated 18
			1
		1	-
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			-
			-
	_	<u> </u>	-1
		TCD	Enter a score between 1 and 100 for the Tenant Services Rating.
A	L C	ICD .	If this Section was not reviewed, enter 0.
			75 is 10% of the overall score.
			This category is rated g
	and the second se		General Management Practices Rating
. <b>A</b>		100	If this Section was not reviewed, enter 0.
1 [	RI I		75 is 10% of the overall score.
			This category is rated 8
			-i
		A       C         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø       0         Ø	ACTCD

🗆 Superior 🖆 Above Average 🖾 Satisfactory 🛄 Below Average 🗀 Unsatisfactory 79 Overall Score:

To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.

Name and Title of Person Preparing this Report: (Please type or print): Lisa M. Taylor	Name and Title of Person Approving this Report: (Please type or print):
,	Laura A. Taylor
Housing Management Specialist, Bureau of Housing Management	Director, Bureau of Houging Management
Department of Housing & Community Development	Department of Housing and Community Development
Signature: Man	Signature: Signature All M
Date: _04/05/2019	Date: 45/20 9

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. form HUD-9834 (06/2016)

Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

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HUD 9834 Ref. Namber	Finding		Target Completion Date
<u>14. (d)</u>	Condition:	HUD 92006 form "Supplement to Application for Federally Assisted Housing" not attached to application	30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Ch.4, Par. 4-14 Taking Applications for Occupancy)	1
	Cause:	Unknown	
	Effect:	SHA did not have information on an individual or organization that may be contacted to assist in providing any delivery of services or special care to applicants who become tenants and to assist with resolving any tenancy issues arising during tenancy	
	Action:	SHA must obtain signed HUD- 92006 form in accordance with HUD Handbook 4350.3	
<u>14. (j)</u>	Condition: Criteria:	Applicants may not have been selected in the proper order HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4, Par. 4-16 (a)(2): Creating and Maintaining Waiting Lists), 760CMR5 Eligibility and Selection Criteria	30 days
	Cause:	SHA does not recognize applicable preference during waitlist selection	1
	Effect: Action:	SHA is unable to select applicants from the waiting list in the proper order	
14. (k)	Condition:	SHA must perform waitlist selection in accordance with 4350.3 and 760CMR5 Waitlist does not recognize applicable preferences	20.1
<u>17. (8)</u>	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4, Par. 4-16 (a)(2): Creating and Maintaining Waiting Lists)	30 days
	Cause:	Unknown	1
	Effect:	SHA is unable to select applicants from the waiting list in accordance with preferences established for the property	
	Action:	SHA must recognize applicable waitlist preferences in accordance with HUD Handbook 4350.3	
<u>14. (l.)</u>	Condition: Criteria:	The SHA is not applying Income Targeting and Monitoring Requirements 24 CFR 5.601, 5.603, 5.653 and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4:	30 days
	-	Waiting List and Tenant Selection, Section 1: Tenant Selection Plan, Par 4-5.	
	Cause:	Unknown.	
	Effect:	Owner may not be meeting the requirements of 24 CFR 5.601, 5.603, or 5.653	
	Action:	The SHA must maintain complete records of the marketing efforts targeted to	
		extremely low-income families, and must demonstrate that reasonable efforts were	
		made to fill available units with extremely low-income households. The owner must also demonstrate that an anguing effort to meet the $40\%$ requirement is being made	
17. (e)	Condition:	also demonstrate that an ongoing effort to meet the 40% requirement is being made SHA does not have EIV user policy	20.1
<u></u>	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-21 Safeguarding EIV Data B-1)	30 days
	Cause:	No EIV policies or procedures	
	Effect:	Please see HUD Handbook Rev.1, Change 4 (Par.9-19: Penalties for Failure to Have Access To and/or Failure to Use EIV)	
	Action:	SHA must have a EIV user policy in accordance with HUD Handbook 4350.3	
1 <u>7. (f)</u>	Condition: Criteria:	SHA does not have a procedure to review all EIV users ID's HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-21 Safeguarding EIV Data)	30 days
	Cause:	SHA has not monitored use or access to EIV	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must have procedure to review all EIV users ID's in accordance with HUD Handbook 4350.3	
<u>7. (h)</u>	Condition:	SHA does not have a procedure to document and report the occurrence of improper disclosures of EIV data	30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9, Ch. 9-21 Safeguarding EIV Data)	
	Cause:	SHA has not monitored use or access to EIV	
	Effect: Action:	SHA does not meet the requirement SHA must have procedure to document and report the occurrence of improper	
	230HOII.	disclosures of EIV data in accordance with HUD Handbook 4350.3	
<u>7. (i)</u>	Condition:	SHA does not have a procedure to report any occurrence of unauthorized EIV access or security breach to the HUD National Help Desk.	30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9, Par. 9-21 Safeguarding EIV Data)	
	Cause:	SHA has not monitored use or access to EIV	
	Effect: Action:	SHA does not meet the requirement SHA must have a procedure to report any occurrence of upputhorized EIV access or	
	ACUOII.	SHA must have a procedure to report any occurrence of unauthorized EIV access or security breach to the HUD National Help Desk in accordance with HUD Handbook 4350.3	

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<u>17. (l.)</u>	Condition:	No EIV Tenant Consent to Disclose Income Information forms in files	30 days
	Criteria :	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-17(a): Disclosure of EIV Data)	
	Cause:	Unknown	
	Effect:	SHA may disclose data in the EIV system that contains personal information on individual tarante that is assured by the Drivery Ast	
	Action:	individual tenants that is covered by the Privacy Act	
<u>18. (a)</u>	Condition:	SHA must use form in accordance with 4350.3 (please see Exhibit 9-4) SHA does not have policies and procedures describing the use of EIV employment and	20.1
<u>16. (a)</u>	Contanuon.	income information and EIV reports.	30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par.9-21 Safeguarding EIV Data)	
	Cause:	SHA is not monitoring use or access to EIV	
	Effect:	SHA toes not meet the requirement	
	Action:	SHA must have policies and procedures describing the use of EIV employment and	
	i iotion.	income information and EIV reports in accordance with HUD Handbook 4350.3	
18. (b)	Condition:	SHA does not retain a EIV "Master" file	20 1 20
101(0)	Criteria:	24 CFR 5.233 - Mandated use of HUD's Enterprise Income Verification (EIV) System	30 days
	Critica.	and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9: Enterprise Income Verification)	
	Cause:	SHA is not tracking EIV discrepancies	
	Effect:	SHA may have unresolved discrepancies resulting incorrect TTP and HAP	
	Action:	SHA must retain a "Master" EIV file in accordance with HUD Handbook 4350.3	
22a. (i)	Condition:	Tenant files are not organized or properly maintained.	20 daria
<u>, , , , , , , , , , , , , , , , , </u>	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 ( Par. 5-23 Record-Keeping Procedures	30 days
	Cause:	Unknown	
	Effect:	CA is unable to adequately evaluate compliance	
	Action:	SHA must maintain tenant files in accordance with HUD Handbook 4350.3 Rev-1,	
		Change 4	
<u>22a. (ii)</u>	Condition:	SHA files do not contain all documentation as required in HUD Handbook 4350.3.	
		applicable HUD Notice	
	Criteria:	24 CFR 5.659 Family Information and Verification and HUD Handbook 4350.3 Rev-1,	
		Change 4 (Ch5: Determining Income and Calculating Rent)	
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must ensure files contain all documentation in accordance with HUD 4350.3 (see	
		attachments	
<b>201</b> (1)			30 days
<u>22b. (i)</u>	Condition:	Applications are not signed and dated by applicant (	
	Criteria;	24 CFR 880.603 - Selection and admission of assisted tenants and HUD Handbook	
	0	4350.3 Rev-1, Change 4	
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must obtain signed and dated applications in accordance with HUD Handbook	
		4350.3 (please see Glossary "Application")	
22b. (ii)	Condition:	Screening is not conducted in accordance with Tenant Selection Dian (TSD)	
<u>20. (11)</u>	Contantion.	Screening is not conducted in accordance with Tenant Selection Plan (TSP) -	
	Criteria:	24 CFR 880.603 - Selection and admission of assisted tenants and HUD Handbook	20 1
	Vincila.	4350.3 Rev-1, Change 4; 760 CMR 5, Eligibility and Selection Criteria; refer to 760CMR5.12	30 days
		Verification Procedures	1
	Cause:	SHA is not verifying social security numbers or conducting criminal screening	
	Effect:	Qualification and Eligibility may not be determined properly	
	Action:	SHA must conduct the appropriate screening procedure in accordance with the	1
		760CMR5.12	
2b. (iv)			
	Condition:	Household ineligible at M/I (	
	Criteria:	24 CFR 5.659 Family information and verification, HUD Handbook 4350.3, Rev-1,	
		Change 4 (Chapter 3: Eligibility for Assistance)	
	Cause:	No Income/asset information or 59 in file to review	
	Effect:	Unable to evaluate	1
	Action:	SHA must verify family income and composition to determine eligibility in accordance with	
			1
		HUD Handbook 4350.3	

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22c.(iv)	Condition:	Addenda not properly attached to leases (	30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 6-5(G): Requirements of HUD Issued	
		Lease Addendums	
	Cause:	VAWA addenda not attached to lease	
	Effect: Action:	SHA does not meet the requirement SHA must attach VAWA lease addenda in accordance with HUD Handbook 4350.3	
		STA must attach VAWA lease addenda in accordance with HUD Hallubook 4530.5	
<u>22c.(vi)</u>	Condition:	File does not contain signed acknowledgements and/or copies as required .(12 files selected)	
	Criteria:	HUD Handbook 4350.3 Rev-1, (Par. 6-27 Briefing with New Tenants, Figure 6-9:	
		Summary of Documents for Tenants)	
	Cause: Effect:	Unknown SHA does not meet the requirement	
	Action:	SHA does not need the requirement SHA must obtain signed forms and or acknowledgements in accordance with HUD	
	. conon.	Handbook 4350.3 Rev-1, Change 4 (see attached sample and refer to Exhibit 4-3)	
<b>AA</b> 1 (1)			
<u>22d. (i)</u>	Condition:	Re- Certification Notices are not issued in accordance with the HUD Requirements 9	30 days
	Criteria:	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of	
	Cincina.	Family Income and Composition and (Par. 7-7(B) Description of Required Notices)	
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must notify tenants of recertification in accordance with the HUD	
		Handbook 4350.3 (refer to Exhibit 7-1 through 7-5)	
22d. (iii)	Condition:	SHA is not properly completing necessary verifications	
<u>,</u>		service in the property completing needood y terminations	
	Criteria:	24 CFR 5.659 Family information and verification, HUD Handbook 4350.3, Rev-1,	
	Cause:	Change 4 (Chapter 3: Eligibility for Assistance) SHA not conducting L/L verification, Criminal screening, citizenship verification, or income	
1	Cause.	Verification.	
	Effect:	Eligibility/Qualification may be incorrectly determined	
	Action:	SHA must perform complete verifications in accordance with HUD Handbook 4350.3	
		(refer to Exhibits 3-4, Exhibits 3-5)	
22d. (iv)	Condition:	EIV report are not being used for third party verification of employment or income	
	Gritanian		
	Criteria:	24 CFR 5.659 Family information and verification; and HUD handbook 4350.3 Rev-1, Change 4 (Par. 9-9: Documentation to Demonstrate Owners Compliance with Use of	
		the Income)	
	Cause:	EIV report not reviewed	
	Effect:	SHA does not meet the requirement	
001 ()	Action:	SHA must use EIV in accordance with HUD Handbook 4350.3	
<u>22d. (v)</u>	Condition:	SHA did not include EIV Summary Report/ Income Report in tenant file(s).	30 days
	Criteria:	24 CFR 5.233 Mandated use of HUD's Enterprise Income Verification (EIV) System	
		and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9: Enterprise Income Verification,	
	~	Section 3: EIV Reports, Par 9-11(A) (3).	
	Cause:	EIV report not reviewed	
	Effect: Action:	Tenants may not be properly verified through EIV. SHA must retain in the tenant file the Summary Report as verification of the SSN for	
	i tottoii.	all household members whose Identity Verification Status is "Verified" in EIV. If the	
		household members' status is verified, the Owner does not need to continue to print out	
		the Summary Report at recertification unless there is a change in household composition	
		or in a household member's identity verification status.	
22d. (vi)	Condition:	SHA is not using the EIV Income Discrepancy Report	
<del></del>	Condition.		30 days
	Criteria:	24 CFR 5.233 - Mandated use of HUD's Enterprise Income Verification (EIV) System	
		and HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-11 (C): Income Discrepancy	
	Course	Report)	
	Cause: Effect:	EIV report not reviewed SHA may have unresolved discrepancies resulting incorrect TTP and HAP	
	Action:	SHA must use the EIV Income Discrepancy Report in accordance with 4350.3 (refer to	
		Exhibit 9-5)	

<u>22d. (vii)</u>	Condition:	Income and deductions are not being calculated correctly prior to data entry	30 days
	Criteria:	HUD Handbook Rev-I, Change 4 (Par. 5-5: Method of Projecting and Calculating Annual Income	
	Cause:	No income verification	
	Effect:	SHA may incorrectly calculate TTP/HAP	
	Action:	SHA must calculate and project income in accordance with 4350.3	
<u>22d. (viii)</u>	Condition:	Income on the tenant certification does not agree with verified file information	
	Criteria:	24 CFR 5.233 Mandated Use of HUD's Enterprise Income Verification (EIV) System and Verification and HUD Handbook 4350.3, Rev.1 Change 4 (Par. 5-13 Acceptable Verification Methods	
	Cause:	Unknown	
	Effect:	SHA may incorrectly calculate TTP/HAP	
	Action:	SHA must use acceptable verification methods in accordance with the HUD Handbook 4350.3	
<u>22e. (i)</u>	Condition:	Deficiencies noted in tenant file review may result in over or underpayment of the subsidy. (	
	Criteria:	HUD Handbook Rev-1, Change 4 (Par. 5-5: Method of Projecting and Calculating Annual Income	
	Cause:	Unknown	
	Effect:	SHA may incorrectly calculate TTP/HAP	
206 (1)	Action:	SHA must calculate and project income in accordance with 4350.3	
<u>22f. (iv)</u>	Condition:	SHA is not utilizing the Existing Tenant Search for all household members and	30 days
	Criteria:	Applicants ( 24 CFR 5.233 Mandated Use of HUD's Enterprise Income Verification (EIV) System and HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-8: Using EIV Reports)	
	Cause:	Unknown	
	Effect:	SHA is able to identify possible multiple subsidies	
	Action:	SHA must use the Existing Tenant Report for new tenants in accordance with HUD Handbook 4350.3	
22 <u>g. (i)</u>	Condition:	Tenant must provide a 30-day written notice of intent to vacate.	30 days
	Criteria:	tion 2:	
	Cause:	Termination of Tenancy by Lessee, Par 8-9; and the HUD lease.	
	Effect;	No record of written 30-day notice from tenant in file. SHA does not comply with HUD requirement.	
	Action:	Future tenants must provide written 30-day notice to vacate to Owner	
22g. (ii)	Condition:	M/O file did not contain a M/O Instruction	
<u>(22. (11)</u>	Criteria:	M/O file did not contain a M/O Inspection (24 CFR 5.703 and 5.705 (Unit inspections) and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 6, Section 4: The Leasing Process), Par 6-29 (A) (2)	
	Cause:	Unknown.	· · ·
	Effect:	SHA does not meet the requirement.	
	Action:	For future M/O: Follow HUD Handbook 4350.3 Rev-1, Change (Par. 6-29 (A)(2))	
2 <u>5. (d)</u>	Condition:	SHA does not have formal ongoing training for its staff (i.e. HUD seminars, Industry Training, AFHMP, Fair Housing, etc.)	365 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 1-7: Additional Program Resources)	
	Cause:	Unknown	
	Effect:	SHA meets the regulatory requirements	
	Action:	SHA should access/utilize HUD's websites as the most efficient means for obtaining	
		the most recent and up-to-date information on HUD programs	



# Commonwealth of Massachusetts DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Charles D. Baker, Governor 🔶 Karyn E. Polito, Lt. Governor 🔶 Jennifer D. Maddox, Acting Undersecretary

April 5, 2019

Denise Jordan Executive Director Springfield Housing Authority 60 Congress Street Po Box 1609 Springfield, MA 01104-1609

#### Re: Management and Occupancy Review Report for Project # MA06H052045

Dear Ms. Jordan:

The enclosed report reflects the results of the Management and Occupancy Review (MOR) of the above development, conducted by the Department of Housing and Community Development (DHCD) on December 20<sup>th</sup> and 21<sup>st</sup>, 2018. The MOR is conducted to determine compliance with HUD's regulations and the owner's established management procedures and practices under the Section 8 New Construction / Substantial Rehabilitation Program. The review resulted in the following ratings:

#### Category

General Appearance and Security Follow-up & Monitoring of Project Inspections Maintenance/Operating Procedures Financial Management Leasing & Occupancy Tenant/Management Relations General Management Practices **Overall Rating** 

#### Rating Above Average Above Average Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory

The deficiencies cited in the enclosed report need to be addressed in accordance with the respective corrective actions within 30 calendar days. If additional time is needed, please submit a corrective action plan within the 30 calendar days. The corrective action plan must identify a timeframe when the deficiencies will be resolved and how and what systems, controls, policies and procedures will be adjusted or changed to assure that the error does not reoccur. The corrective action plan will be monitored by DHCD until all deficiencies have been addressed. If you have any questions regarding this report please feel free to contact me at 617-573-1288.

Sincerely,

Lisa M. Taylor Housing Management Specialist

cc. Laura Taylor, Director, Bureau of Housing Management

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#### Management Review for Multifamily Housing Projects

U.S. Department of Housing and Urban Development Office of Housing – Federal Housing Commissioner OMB Approval No. 2502-0178 Exp. 04/30/2018

Summary

Date of On-Site Review:	Date of Report:	Project Number:		Contract Number:
12/20-12/212018	04/05/2019			MA06H052045
Section of the Act:	Name of Owner:	Project Name:		Project Address:
	Springfield Housing Authority	Family Housing		Scattered Site Developments
Loan Status:	Contract Administrator:	Type of Subsidy:		Type of Housing:
Insured If HUD-Held Non-Insured Co-Insured	☐ HUD Ø CA ☐ PBCA	Section 8     PAC     Section 236     Section 221(d)(3) BMIR	Rent Supplement RAP PRAC Unsubsidized	I Family □ Disabled □ Elderly □ Elderly/Disabled □ Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0.
I. General Appearance				81 is 10% of the overall score.
2. Security			·	This category is rated 9
B. Follow-up and Monitoring of Project Inspections	·····			
	A	С	TCD	Enter a score between 1 and 109 for the Follow-up and Monitoring of Project Inspection Rating .
3. Follow-Up and Monitoring of Last Physical Inspection and	62		1	If this Section was not reviewed, enter 0. 85 is 10% of the overall score.
Observations	1			85 is 10% of the overall score.
4. Follow-Up and Monitoring of Lead-Based Paint Inspection	I 🖬			This category is rated 9
C. Maintenance and Standard Operating Procedures	A	С	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedur Rating.
5. Maintenance			· · ·	If this Section was not reviewed, enter 0.
6. Vacancy and Turnover			+	75 is 10% of the overall score.
7. Energy Conservation		HH	1	This category is rated 8
D. Financial Management/Procurement		C C	TCD	
<u> </u>	A	L.		Enter 2 score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0.
8. Budget Management				$\frac{75}{100}$ is 25% of the overall score.
9. Cash Controls				This category is rated 19
10. Cost Controls	V			
11. Procurement Controls				
12. Accounts Receivable/Payable	I III		· · · ·	
13. Accounting and Bookkeeping				
E. Lessing and Occupancy	A	C	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0.
14. Application Processing/ Tenant Selection		1 121		70 is 25% of the overall score.
15. Leases and Deposits				This category is rated 18
16. Eviction/Termination of Assistance Procedures		10		num
17. Enterprise Income Verification (EIV) System Access and				-
Security Compliance	_			
<ol> <li>Compliance with Using EIV Data and Reports</li> </ol>				
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance		0.		
20. TRACS Security Requirements	52			-
1. Tenant File Security				
22. Summary of Tenant File Review				
F. Tenant/Management Relations	A	С	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0.
23. Tenant Concerns				75 is 10% of the overall score.
4. Provision of Tenant Services				This category is rated 8
General Management Practices	A	C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0.
5. General Management Operations		121		75 is 10% of the overall score.
6. Owner/Agent Participation				This category is rated 8
7. Staffing and Personnel Practices		╅╧╋╋		
Overall Rating:				

🖬 Superior 🔲 Above Average 🖬 Satisfactory 🔲 Below Average 🔲 Unsatisfactory 79. Overall Score:

To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.

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Name and Title of Person Preparing this Report: (Please type or print): Lisa M. Taylor Housing Manag pt Specialist, Bureau of Housing Management Department of H ng & Com prjent Sions D3Date: 0

Name and Title of Person Approving this Report: (Please type or print): Laura A. Taylor Director, Bureau of Housing Management Department of He ising & Community D relopmen

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. form HUD-9834 (06/2016)

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Date:

Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

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HUD 9834 Ref. Number	Finding		Target Completion Date
<u>14. (j)</u>	Condition: Criteria:	Applicant may not have been selected in the proper order HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4, Par. 4-16 (a)(2): Creating and Maintaining Waiting Lists), 760CMR5 Eligibility and Selection Criteria	30 days
	Cause:	SHA does not recognize applicable preference during waitlist selection	
	Effect:	SHA is unable to select applicants from the waiting list in the proper order	
	Action:	SHA must perform waitlist selection in accordance with 4350.3 and 760CMR5	
<u>14. (k)</u>	Condition: Criteria:	Waitlist does not recognize applicable preferences HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4, Par. 4-16 (a)(2): Creating and Maintaining Waiting Lists)	30 days
	Cause:	SHA is limited by existing software	
	Effect:	SHA is unable to select applicants from the waiting list in accordance with preferences	
	Action:	established for the property SHA must recognize applicable waitlist preferences in accordance with HUD Handbook 4350.3	
14, (l)	Condition:	SHA is not applying Income Targeting and Monitoring Requirements	20 days
<u>x, 1,1/</u>	Criteria:	24 CFR 5.601, 5.603, 5.653 and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4:	30 days
		Waiting List and Tenant Selection, Section 1: Tenant Selection Plan, Par 4-5	
	Cause:	Unknown.	
	Effect:	Owner may not be meeting the requirements of 24 CFR 5.601, 5.603, or 5.653	
	Action:	The owner must maintain complete records of the marketing efforts targeted to	
		extremely low-income families, and must demonstrate that reasonable efforts were	
		made to fill available units with extremely low-income households. The owner must also demonstrate that an ongoing effort to meet the 40% requirement is being made	
<u>17.(e)</u>	Condition:	SHA does not have EIV user policy	20 dazia
<u></u>	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-21 Safeguarding EIV Data B-1)	30 days
	Cause:	Unknown	
	Effect:	Please see HUD Handbook Rev.1, Change 4 (Par.9-19: Penalties for Failure to Have	
		Access To and/or Failure to Use EIV)	
17 (8	Action: Condition:	SHA must have a EIV user policy in accordance with HUD Handbook 4350.3	
<u>17. (f)</u>	Criteria:	SHA does not have a procedure to review all EIV users ID's HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-21 Safeguarding EIV Data)	30 days
	Cause:	SHA has not monitored use or access to EIV	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must have procedure to review all EIV users ID's in accordance with HUD Handbook 4350.3	
<u>17. (h)</u>	Condition:	SHA does not have a procedure to document and report the occurrence of improper disclosures of EIV data	30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9, Ch. 9-21 Safeguarding EIV Data)	-
	Cause:	SHA has not monitored use or access to EIV	
1	Effect:	SHA does not meet the requirement	
	Action:	SHA must have procedure to document and report the occurrence of improper disclosures of EIV data in accordance with HUD Handbook 4350.3	
17. <u>(i)</u>	Condition:	SHA does not have a procedure to report any occurrence of unauthorized EIV access or	30 days
	Criteria:	security breach to the HUD National Help Desk. HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9, Par. 9-21 Safeguarding EIV	
	Cause:	Data) SHA has not monitored use or access to EIV	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must have a procedure to report any occurrence of unauthorized EIV access or	
		security breach to the HUD National Help Desk in accordance with HUD	
		Handbook 4350.3	
<u>.7. (l.)</u>	Condition:	No EIV Tenant Consent to Disclose Income Information forms in files	30 days
	Criteria :	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-17(a): Disclosure of EIV Data)	-
	Cause: Effect:	Unknown SHA may disclose data in the EIV system that contains personal information on	
	Litteet.	individual tenants that is covered by the Privacy Act	
	Action:	SHA must use form in accordance with 4350.3, please see Exhibit 9-4	
18. (a)	Condition:	SHA does not have policies and procedures describing the use of EIV employment and	30 days
<u>(4)</u>		income information and EIV reports	20 4495
<u></u>		HUD Handbook 4350.3 Rev-1, Change 4 (Par.9-21 Safeguarding EIV Data)	1
	Criteria:		
	Cause:	SHA is not monitoring use or access to EIV	

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<u>18. (b)</u>	Condition:	SHA does not retain a EIV "Master" file	30 days
	Criteria;	24 CFR 5.233 - Mandated use of HUD's Enterprise Income Verification (EIV) System and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9: Enterprise Income Verification)	50 days
	Cause:	SHA is not tracking EIV discrepancies	
	Effect:	SHA may have unresolved discrepancies resulting incorrect TTP and HAP	
	Action:	SHA must retain a "Master" EIV file in accordance with HUD Handbook 4350.3	
<u>22a. (i)</u>	Condition: Criteria:	Tenant files are not organized or properly maintained. HUD Handbook 4350.3 Rev-1, Change 4 ( Par. 5-23 Record-Keeping Procedures	30 days
	Cause:	Unknown	
	Effect:	CA is unable to adequately evaluate compliance	
	Action:	SHA must maintain tenant files in accordance with HUD Handbook 4350.3 Rev-1, Change 4	
<u>22a. (ii)</u>	Condition:	SHA files do not contain all documentation as required in HUD Handbook 4350.3	
	Criteria:	applicable HUD Notice 24 CFR 5.659 Family Information and Verification and HUD Handbook 4350.3 Rev-1, (herea 4 (Ch5) Determining Learner and Calculating Part)	
	Cause:	Change 4 (Ch5: Determining Income and Calculating Rent) Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must ensure files contain all documentation in accordance with HUD 4350.3. VAWA Lease addendum	
<u>22b. (i)</u>	Condition: Criteria:	Applications are not signed and dated by tenant (	30 days
	Cause:	760CMR5.05:Procedure following Application Procedure Following Application SHA is processing incomplete application forms	
	Effect:	SHA is not meeting the requirement	
	Action:	SHA must ensure that application forms are complete including signature from tenant/applicant.	
<u>22b. (ii)</u>	Condition:	Screening is not conducted in accordance with Tenant Selection Plan	
	Criteria:	24 CFR 880.603 - Selection and admission of assisted tenants and HUD Handbook 4350.3 Rev-1, Change 4; 760 CMR 5, Eligibility and Selection Criteria; refer to 760CMR5.12	
	0	Verification Procedures	
`	Cause:	SHA is not screening for Criminal Background and not documenting the status of the Check once screening is complete (i.e. approved/denied)	
	Effect:	Applicants may be admitted to project who are not qualified	
222 (88)	Action: Condition:	SHA must screen applicant in accordance with 760CMR5	
<u>22c.(iii)</u>	Criteria:	Lease Addenda are not signed by tenant (# Horney Horney Hub Handbook 4350.3 Rev-1, Change 4 (Par. 6-5(B)(2): Key Requirements)	30 days
	Cause:	Unknown	
	Effect: Action:	SHA does not meet the requirement SHA must tenant obtain signatures for the owner's lease addendum in accordance with	
		4350.3	
<u>22c.(iv)</u>	Condition:	Addenda not properly attached to lease (#	
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 6-5(G): Requirements of HUD Issued Lease Addendums	-
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must attach HUD Form 92006 in accordance with HUD Handbook 4350.3	
<u>22c.(vii)</u>	Condition:	File does not contain signed acknowledgements and/or copies as required.	-
	Criteria:	HUD Handbook 4350.3 Rev-1, (Par. 6-27 Briefing with New Tenants, Figure 6-9: Summary of Documents for Tenants)	
	Cause:	Unknown	
	Effect: Action:	SHA does not meet the requirement SHA must obtain signed forms and or acknowledgements in accordance with HUD	
<u> </u>	T IOUIDII.	Handbook 4350.3 Rev-1, Change 4	
<u>22d. (i)</u>	Condition: Criteria:	Re- Certification Notices are not issued in accordance with the HUD Requirements	30 days
	Unterna:	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of family Income and Composition and (Par. 7-7(B) Description of Required Notices)	
	Cause: Effect:	Unknown	
	Action:	SHA does not meet the requirement SHA must notify tenants of recertification in accordance with the HUD Handbook 4350.3	
22d. <u>(ii)</u>	Condition:	Certifications are not completed on time	
	Criteria:	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of Family Income and Composition and HUD Handbook 4350.3 Rev-1, Change 4 (Par.	
		7-5 Timing of Annual Recertification)	

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			30 days
	Condition: Criteria:	SHA is not properly completing necessary verifications 24 CFR 5.659 Family information and verification, HUD Handbook 4350.3, Rev-1,	
		Change 4 (Chapter 3: Eligibility for Assistance)	
<u>22d. (iii)</u>	Cause:	Unknown	
	Effect: Action:	Eligibility may be incorrectly determined SHA must perform complete verifications in accordance with HUD Handbook 4350.3	
		(Refer to Exhibits 3-4, Exhibits 3-5)	
			-
<u>22d. (iv)</u>	Condition:	EIV report are not being used for third party verification of employment or income	30 days
	Criteria:	24 CFR 5.659 Family information and verification; and HUD handbook 4350.3 Rev-1, Change 4 (Par. 9-9: Documentation to Demonstrate Owners Compliance with Use of the Income)	
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must use EIV in accordance with HUD Handbook 4350.3	
22d. (vi)	Condition: Criteria:	SHA is not using the EIV Income Discrepancy Report 24 CFR 5.233 - Mandated use of HUD's Enterprise Income Verification (EIV) System	
		and HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-11 (C): Income Discrepancy Report)	
	Cause:	Unknown	
	Effect:	SHA may have unresolved discrepancies resulting incorrect TTP and HAP	
	Action:	SHA must use the EIV Income Discrepancy Report in accordance with 4350.3	
22 <u>d. (viii)</u>	Condition:	Income on the tenant certification does not agree with verified file information	
	Criteria:	24 CFR 5.233 Mandated Use of HUD's Enterprise Income Verification (EIV)	
		System and Verification and HUD Handbook 4350.3, Rev.1 Change 4 (Par. 5-13 Acceptable Verification Methods	
	Cause:	Unknown	
	Effect: Action:	SHA may incorrectly calculate TTP SHA must use acceptable verification methods in accordance with the HUD Handbook	
		4350.3	
<u>22d. (xi)</u>	Condition:	Recertification Notices not provided to tenant in accordance with HUD notification requirements.	
	Criteria:	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of Family Income and Composition and HUD Handbook 4350.3, Rev.1 Change 4 (Par.	
		7-7(B) Description of Required Notices)	
	Cause: Effect:	SHA did not issue 120, 90, 60 Notice of Recertification SHA has not completed the verification process in time to give the tenant a 30-day	
	Lifeet.	advance notice of a rent increase	
	Action:	SHA must provide notice of rent increases in accordance with HUD Handbook 4350.3	
2e. (i)	Condition:	Deficiencies noted in tenant file review may result in over or underpayment of the subsidy.	30 days
	Criteria:	HUD Handbook Rev-1, Change 4 (Par. 5-5: Method of Projecting and Calculating Annual Income	
Í	Cause:	LHA provided less than 30 Notice for a Rent Increase	
	Effect:	SHA may incorrectly calculate TTP/HAP	
	Action:	SHA must calculate and project income in accordance with 4350.3 to calculate the appropriate subsidy and voucher payments	
<u>2f. (ii)</u>	Condition:	Tenant file(s) do not contain move-in inspections. (	30 days
	Criteria:	24 CFR 5.703 and 5.705 (Unit inspections) and HUD Handbook 4350.3 Rev-1, Change (Ch. 6, Section 4: The Leasing Process, Par. 6-29)	
	Cause:	SHA is not documenting M/I Inspections	
1	Effect: Action:	Owner does not meet HUD requirements Tenant files must contain move-in inspections.	
<u>2f. (iv)</u>	Condition:	SHA is not utilizing the Existing Tenant Search for all household members and	30 days
	Cuitoria	Applicants	
	Criteria:	24 CFR 5.233 Mandated Use of HUD's Enterprise Income Verification (EIV) System and HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-8: Using EIV	
	Cause:	Reports) SHA did not use Existing Tenant Search at screening	
ŀ	Effect:	SHA is able to identify possible multiple subsidies	
	Action:	SHA must use the Existing Tenant Report during screening in accordance with HUD handbook 4350.3	

			1
<u>25. (d)</u>	Condition:	SHA does not have formal ongoing training for its staff (i.e. HUD seminars, Industry	365 days
		Training, AFHMP, Fair Housing, etc.)	
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 1-7: Additional Program Resources)	
	Cause:	Unknown	
	Effect:	SHA meets the regulatory requirements	
	Action:	SHA should access/utilize HUD's websites as the most efficient means for obtaining	
		the most recent and up-to-date information on HUD programs.	



# Commonwealth of Massachusetts DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Charles D. Baker, Governor 🔶 Karyn E. Políto, Lt. Governor 🔶 Jennifer D. Maddox, Acting Undersecretary

April 5, 2019

Denise Jordan Executive Director Springfield Housing Authority 60 Congress Street Po Box 1609 Springfield, MA 01104-1609

#### Re: Management and Occupancy Review Report for Project # MA06H052058

Dear Ms. Jordan:

The enclosed report reflects the results of the Management and Occupancy Review (MOR) of the above development, conducted by the Department of Housing and Community Development (DHCD) on December 20<sup>th</sup> and 21<sup>st</sup>, 2018. The MOR is conducted to determine compliance with HUD's regulations and the owner's established management procedures and practices under the Section 8 New Construction / Substantial Rehabilitation Program. The review resulted in the following ratings:

#### Category

General Appearance and Security Follow-up & Monitoring of Project Inspections Maintenance/Operating Procedures Financial Management Leasing & Occupancy Tenant/Management Relations General Management Practices **Overall Rating** 

### Rating

Above Average Above Average Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory

The deficiencies cited in the enclosed report need to be addressed in accordance with the respective corrective actions within 30 calendar days. If additional time is needed, please submit a corrective action plan within the 30 calendar days. The corrective action plan must identify a timeframe when the deficiencies will be resolved and how and what systems, controls, policies and procedures will be adjusted or changed to assure that the error does not reoccur. The corrective action plan will be monitored by DHCD until all deficiencies have been addressed. If you have any questions regarding this report please feel free to contact me at 617-573-1288.

Sincerely,

Lisa M. Taylor Housing Management Specialist

cc. Laura Taylor, Director, Bureau of Housing Management



www.mass.gov/dhcd 617.573.1100

#### Management Review for Multifamily Housing Projects

#### U.S. Department of Housing and Urban Development Office of Housing – Federal Housing Commissioner

OMB Approval No. 2502-0178 Exp. 04/30/2018

Summary

Date of On-Site Review:	Date of Report:	Project Number:		Contract Number:
12/20-12/212018	04/05/2019			MA06H052058
Section of the Act:	Name of Owner:	Project Name:		Project Address:
	Springfield Housing Authority	Reed Village		49 Lionel Benoit Road
Loan Status:	Contract Administrator:	Type of Subsidy:		Type of Housing:
<ul> <li>Insured</li> <li>HUD-Held</li> <li>Non-Insured</li> <li>Co-Insured</li> </ul>	☐ HUD ☑ CA ☐ PBCA	<ul> <li>✓ Section 8</li> <li>□ PAC</li> <li>□ Section 236</li> <li>□ Section 221(d)(3) BMIR</li> </ul>	☐ Rent Supplement ☐ RAP ☐ PRAC ☐ Unsubsidized	Family     Disabled     Elderly/Disabled     Other (please specify)

For each applicable category, assess the overall performance by checking the appropriate column. Indicate A (Acceptable) or C (Corrective action required). Include target completion dates (TCD) for all corrective action items. For those items not applicable, place N/A in the TCD column.

A. General Appearance and Security	A	C	TCD	Enter a score between 1 and 100 for the General Appearance and Security Rating. If this Section was not reviewed, enter 0.
I. General Appearance	12			<u>82</u> is 10% of the overall score.
2. Security				This category is rated 9
B. Follow-up and Moniforing of Project Inspections	A	C	TCD	Enter a score between 1 and 100 for the Follow-up and Monitoring of Project Inspections Rating
3. Follow-Up and Monitoring of Last Physical Inspection and Observations	Ø		· · · · · · · · · · · · · · · · · · ·	If this Section was not reviewed, enter 0. <u>81</u> is 10% of the overall score.
4. Follow-Up and Monitoring of Lead-Based Paint Inspection				This category is rated 9
C. Maintenauce and Standard Operating Procedures	A	C	TCD	Enter a score between 1 and 100 for the Maintenance and Standard Operating Procedures Rating.
5. Maintenance		1		If this Section was not reviewed, enter 0.
6. Vacancy and Turnover				75 is 10% of the overall score.
7. Energy Conservation	12			This category is rated 8
D. Financial Management/Procurement	A	С	TCD	Enter a score between 1 and 100 for the Financial Management/Procurement Rating. If this Section was not reviewed, enter 0.
8. Budget Management	E E			75 is 25% of the overall score.
9. Cash Controls	NZ			This category is rated 19
10. Cost Controls				
11. Procurement Controls	152			
12. Accounts Receivable/Payable	🖬			
13. Accounting and Bookkeeping	2			
E. Leasing and Occupancy	A	С	TCD	Enter a score between 1 and 100 for the Leasing and Occupancy Rating. If this Section was not reviewed, enter 0.
14. Application Processing/ Tenant Selection				70 is 25% of the overall score.
15. Leases and Deposits	12			This category is rated 18
16. Eviction/Termination of Assistance Procedures				-
17. Enterprise Income Verification (EIV) System Access and Security Compliance		Ī		
18. Compliance with Using EIV Data and Reports		521		-
19. Tenant Rental Assistance Certification Systems (TRACS) Monitoring and Compliance				
20. TRACS Security Requirements	Ø			~
21. Tenant File Security				
22. Summary of Tenant File Review				••••
F. Tenaut/Management Relations	A	C	TCD	Enter a score between 1 and 100 for the Tenant Services Rating. If this Section was not reviewed, enter 0.
23. Tenant Concerns				75 is 10% of the overall score.
24. Provision of Tenant Services		╅┲──┼		This category is rated 8
G. General Management Practices	A	C C	TCD	General Management Practices Rating. If this Section was not reviewed, enter 0.
25. General Management Operations				75 is 10% of the overall score.
26. Owner/Agent Participation		┼╫╴╸╸┼		This category is rated 8
27. Staffing and Personnel Practices	12	┼┼┼╌╌╍┼╴		
Overall Rating:		1 <b>u</b> (		ada a seconda de second

🗆 Superior 🗋 Above Average 🕱 Satisfactory 🗆 Below Average 📑 Unsatisfactory 79 Overali Score:

To calculate an overall score: Multiply the derived performance value by the assigned percentage of the overall rating for each category. Once all tested categories have been calculated based on the performance indicator and performance indicator values, the total calculated points is divided by the total percentage of overall rating and rounded to the nearest whole number. For convenience, a utility is included with this form which will perform all of the necessary calculations.

Name and Title of Person Preparing this Report: (Please type or print):	Name and Title of Person Approving this Report: (Please type or print):
Lisa M. Taylor	Laura A. Taylor
Housing Management Specialist, Bureau of Housing Management	Director, Bureau of Housing Management
Department of Housing & <u>Community Development</u>	Department of Housing & Community Development
Signature:	Signature:

NOTE: If this review is conducted by a CA or PBCA as indicated above, the overall rating reflects a review as it relates to compliance with the Housing Assistance Payment Contract (HAP) only. form HUD-9834 (06/2016) Ref. HI ID Hurdback 4250 1. DEV 1

Ref. HUD Handbook 4350.1, REV-1 and HUD Handbook 4566.2

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HUD 9834 Ref. Number	Finding		Target Completion Date
<u>14. (j)</u>	Condition: Criteria:	Applicants may not have been selected in the proper order HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4, Par. 4-16 (a)(2): Creating and Maintaining Waiting Lists), 760CMR5 Eligibility and	30 days
	Cause: Effect:	Selection Criteria SHA does not recognize applicable preference during waitlist selection SHA is unable to select applicants from the waiting list in the proper	
	Action:	Order SHA must perform waitlist selection in accordance with 4350.3 and 760CMR5	
<u>14. (k)</u>	Condition: Criteria:	Waitlist does not recognize applicable preferences HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4, Par. 4-16 (a)(2): Creating and	30 days
	Cause: Effect:	Maintaining Waiting Lists) Unknown SHA is unable to select applicants from the waiting list in accordance with preferences	
	Action:	established for the property SHA must recognize applicable waitlist preferences in accordance with HUD Handbook 4350.3	
<u>14. (I)</u>	Condition: Criteria:	The Owner is not applying Income Targeting and Monitoring Requirements 24 CFR 5.653(c) and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 4: Waiting List and Tenant Selection, Section 1: Tenant Selection Plan, Par 4-5.	30 days
	Cause: Effect: Action:	Unknown Owner may not be meeting the requirements of 24 CFR 5.601, 5.603, or 5.653 Owner is responsible for tracking income of applicants and ensuring that not less than 40% of the dwelling units that become available for occupancy in any fiscal year are	
<u>17. (e)</u>	Condition: Criteria:	leased to extremely low income families SHA does not have EIV user policy HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-21 Safeguarding EIV Data	30 days
	Cause: Effect:	B-1) Unknown Please see HUD Handbook Rev.1, Change 4 (Par.9-19: Penalties for Failure to Have Access To and/or Failure to Use EIV)	
17 (0	Action:	SHA must have a EIV user policy in accordance with HUD Handbook 4350.3	
<u>17. (f)</u>	Condition: Criteria:	SHA does not have a procedure to review all EIV users ID's HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-21 Safeguarding EIV Data)	30 days
	Cause: Effect: Action:	SHA has not monitored use or access to EIV SHA does not meet the requirement SHA must have procedure to review all EIV users ID's in accordance with HUD	
17. (h)	Canditian	Handbook 4350.3	
<u>17. (n)</u>	Condition: Criteria:	SHA does not have a procedure to document and report the occurrence of improper disclosures of EIV data HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9, Ch. 9-21 Safeguarding EIV Data)	30 days
	Cause: Effect:	SHA has not monitored use or access to EIV SHA does not meet the requirement	
17 (1)	Action:	SHA must have procedure to document and report the occurrence of improper disclosures of EIV data in accordance with HUD Handbook 4350.3	
<u>17. (i)</u>	Condition: Criteria:	SHA does not have a procedure to report any occurrence of unauthorized EIV access or security breach to the HUD National Help Desk. HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9, Par. 9-21 Safeguarding EIV	30 days
	Cause: Effect:	Data) SHA has not monitored use or access to EIV SHA does not meet the requirement	
	Action:	SHA must have a procedure to report any occurrence of unauthorized EIV access or security breach to the HUD National Help Desk in accordance with HUD Handbook 4350.3	
1 <u>7. (<b>l.</b>)</u>	Condition: Criteria : Cause:	No EIV Tenant Consent to Disclose Income Information forms in files HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-17(a): Disclosure of EIV Data) Unknown	30 days
	Effect: Action:	SHA may disclose data in the EIV system that contains personal information on individual tenants that is covered by the Privacy Act. SHA must use form in accordance with 4350.3, please see Exhibit 9-4	
1 <u>8. (a)</u>	Condition:	SHA does not have policies and procedures describing the use of EIV employment and	30 days

	1	income information and EDV	
	Criteria:	income information and EIV reports. HUD Handbook 4350.3 Rev-1, Change 4 (Par.9-21 Safeguarding EIV Data)	
	Cause:	SHA is not monitoring use or access to EIV	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must have policies and procedures describing the use of EIV employment and	
		income information and EIV reports in accordance with HUD Handbook 4350.3.	
<u>18. (b)</u>	Condition:	SHA does not retain a EIV "Master" file	30 days
	Criteria:	24 CFR 5.233 - Mandated use of HUD's Enterprise Income Verification (EIV) System	
	Canaci	and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9: Enterprise Income Verification)	
	Cause: Effect:	SHA is not tracking EIV discrepancies SHA may have unresolved discrepancies resulting incorrect TTP and HAP	
	Action:	SHA must retain a "Master" EIV file in accordance with HUD Handbook 4350.3	
22b. (i)	Condition:	Applications are not signed and dated by applicant (	
	Criteria:	24 CFR 880.603 - Selection and admission of assisted tenants and HUD Handbook	30 days
		4350.3 Rev-1, Change 4	
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must obtain signed and dated applications in accordance with HUD Handbook	
		4350.3 (please see Glossary "Application")	
<u>22b. (ii)</u>	Condition:	Screening is not conducted in accordance with Tenant Selection Plan	
	Criteria:	760CMR5.12:3 Verification Procedures	
	Cause:	SHA is not screening for Criminal Background and not documenting the status of the	
	Effect:	Check once screening is complete (i.e. approved/denied) Applicants may be admitted to project who are not qualified.	
	Action:	SHA must screen applicant in accordance with 760CMR5.	
	2 lotion.	Sinx must server approant in accordance with /occivity.	
22b. (iv)	Condition:	Household ineligible at M/I	
	Criteria:	24 CFR 5.659 Family information and verification, HUD Handbook 4350.3, Rev-1,	
		Change 4 (Chapter 3: Eligibility for Assistance)	
	Cause:	SHA did not properly verify asset income at M/I	
	Effect: Action:	Unable to determine gross incomparison of the payment of HAP	
	Action.	SHA must perform complete verifications in accordance with HUD Handbook 4350.3	
22c.(iv)	Condition:	Addenda not properly attached to leases (	20.1
			30 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par. 6-5(G): Requirements of HUD Issued	
		Lease Addendums	
	Cause: Effect:	VAWA lease addenda not attached to lease	
	Action:	SHA does not meet the requirement SHA must attach VAWA lease addenda HUD form 910267 to lease	
	Action,	STA must duden VAWA lease addenda 110D totili 910207 to lease	
22c.(vii)	Condition:	File does not contain signed acknowledgements and/or copies as required.	
	Criteria:	HUD Handbook 4350.3 Rev-1, (Par. 6-27 Briefing with New Tenants, Figure 6-9:	
	Cincija.	Summary of Documents for Tenants).	
	Cause:	Unknown	
	Effect:	SHA does not meet the requirement	
	Action:	SHA must obtain signed forms and or acknowledgements in accordance with HUD	
		Handbook 4350.3 Rev-1, Change 4 (see attached sample and refer to Exhibit 4-3)	
2d. (i)	Condition:	Re- Certification Notices are not issued in accordance with the HUD Requirements	30 days
			Jourgs
	Criteria:	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of	
		Family Income and Composition and (Par. 7-7(B) Description of Required Notices)	
	Cause:	SHA did not issue 120, 90, or 60 day Notice of Recertification	1
	Effect:	SHA does not meet the requirement	
	Action:	SHA must notify tenants of recertification in accordance with the HUD Handbook 4350.3 (refer to Exhibit 7-1 through 7-5)	
2d. (ii)	Condition:	Recertification not completed on time	
. <u>20. (11)</u>	Criteria;	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of	
		Family Income and Composition and HUD handbook 43503, Rev-1, Change 4 Figure 7-3:	
			1
		Recertification Steps	
	Effect:		
	Effect: Action:	Recertification Steps	

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<u>22d. (iii)</u>	Condition: Criteria:	SHA is not properly completing necessary verifications (1997) (24 CFR 5.659 Family information and verification, HUD Handbook 4350.3, Rev-1,	
		Change 4 (Figure 7-3: Recertification Steps)	
	Cause: Effect:	SHA did not properly verify asset income Income ineligibility resulting in the incorrect calculation of TTP and HAP	
	Action:	SHA must perform complete verifications in accordance with HUD Handbook 4350.3	
<u>22d. (iv)</u>	Condition:	EIV report are not being used for third party verification of employment or income	
	Criteria:	24 CFR 5.659 Family information and verification; and HUD handbook 4350.3 Rev-1,	30 days
		Change 4 (Par. 9-9: Documentation to Demonstrate Owners Compliance with Use of	
	Cause:	the Income) No EIV reports reviewed	
	Effect: Action:	SHA does not meet the requirement SHA must use EIV in accordance with HUD Handbook 4350.3	
<u>22d. (v)</u>	Condition:	SHA did not include EIV Summary Report/ Income Report in tenant file(s). (	
	Criteria:	24 CFR 5.233 Mandated use of HUD's Enterprise Income Verification (EIV) System and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 9: Enterprise Income Verification,	
	0	Section 3: EIV Reports, Par 9-11(A) (3).	
	Cause: Effect:	No EIV reports reviewed Tenants may not be properly verified through EIV.	
	Action:	SHA must retain in the tenant file the Summary Report as verification of the SSN for all household members whose Identity Verification Status is "Verified" in EIV. If the	
		household members' status is verified, the Owner does not need to continue to print out	
		the Summary Report at recertification unless there is a change in household composition or in a household member's identity verification status	
22d. (vi)	Condition:	SHA is not using the EIV Income Discrepancy Report (#	
	Criteria:		
	Cintena.	24 ČFR 5.233 - Mandated use of HUD's Enterprise Income Verification (EIV) System and HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-11 (C): Income Discrepancy	
	Cause:	Report) No EIV reports reviewed	
	Effect:	SHA may have unresolved discrepancies resulting incorrect TTP and HAP	
	Action:	SHA must use the EIV Income Discrepancy Report in accordance with 4350.3(refer to Exhibit 9-5)	
<u>22d. (xi)</u>	Condition:	Recertification Notices not provided to tenant in accordance with HUD notification requirements	
	Criteria:	24 CFR 5.657 Section 8 Project-based Assistance Programs: Re-examination of	
		Family Income and Composition and HUD Handbook 4350.3, Rev.1 Change 4 (Par. 7-7(B) Description of Required Notices)	
	Cause: Effect:	SHA did not issue 120, 90, 60 Notice of Recertification SHA has not completed the verification process in time to give the tenant a 30-day	
		advance notice of a rent increase	
	Action:	SHA must provide notice of rent increases in accordance with HUD Handbook 4350.3	
<u>22f. (iv)</u>	Condition:	SHA is not utilizing the Existing Tenant Search for all household members and applicants	30 days
	Criteria:	24 CFR 5.233 Mandated Use of HUD's Enterprise Income Verification	
		(EIV) System and HUD Handbook 4350.3 Rev-1, Change 4 (Par. 9-8: Using EIV Reports)	
	Cause:	Unknown	
	Effect: Action:	SHA is able to identify possible multiple subsidies SHA must use the Existing Tenant Report for new tenants in accordance with	
		HUD Handbook 4350.3 (refer to Exhibit 9-4)	
<u>22g. (i)</u>	Condition: Criteria:	Tenant must provide a 30-day written notice of intent to vacate. HUD Model Lease and HUD Handbook 4350.3 Chapter 8: Termination, Section 2:	30 days
		Termination of Tenancy by Lessee, Par 8-9; and the HUD lease.	
	Cause: Effect:	No record of written 30-day notice from tenant in file. SHA does not comply with HUD requirement.	
	Action:	Future tenants must provide written 30-day notice to vacate to Owner	

<u>22g. (ii)</u>	Condition: Criteria:	M/O file did not contain a M/O Inspection 24 CFR 5.703 and 5.705 (Unit inspections) and HUD Handbook 4350.3 Rev-1, Change 4 (Ch. 6, Section 4: The Leasing Process), Par 6-29 (A) (2)	30 days
	Cause:	Unknown.	
	Effect:	SHA does not meet the requirement	
	Action:	For future M/O: Follow HUD Handbook 4350.3 Rev-1, Change (Par. 6-29 (A)(2))	
<u>25. (d)</u>	Condition:	SHA does not have formal ongoing training for its staff (i.e. HUD seminars, Industry Training, AFHMP, Fair Housing, etc.)	365 days
	Criteria:	HUD Handbook 4350.3 Rev-1, Change 4 (Par.1-7: Additional Program Resources)	
	Cause:	Unknown	
	Effect:	SHA meets the regulatory requirements	
	Action:	SHA should access/utilize HUD's websites as the most efficient means for obtaining	
		the most recent and up-to-date information on HUD programs	

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ASSOCIATE DIRECTOR Division of Public Housing

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SPRINGFIELD Housing

AUTHORITY

Lisa Taylor Housing Management Specialist Department of Housing and Community Development 100 Cambridge Street, Suite 300 Boston, MA 02114

Re: Corrective Action Plan for #MA06H052058, #MA06H052045 and #MA06H052016

Dear Ms. Taylor:

I am writing in response to the results of the Management Review conducted on December 20th and 21, 2018. With the exception of the items listed below, everything has been addressed by the respective property managers. Additionally, on May 7, 2019, property management staff attended rent calculation training from MASS NAHRO that was hosted by the SHA. The training specifically focused on both State and State Section 8 rent calculations.

14. Although SHA is currently using preferences for tenant selection, the computer system we are currently using does not show the preferences. SHA is in the process of upgrading its software system to YARDI. The anticipated completion date is August 2019.

17. EIV Policy and Procedures- Sample plans have been received and are in the process of being reviewed. SHA's policy will be written and brought forward to SHA's Board of Commissioners for approval no later than August 2019.

If you need any additional information, please feel free to contact me.

Sincerely, Denise R. Jordan

**Executive Director** 

