

Overview and Certification

Sterling 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\(4\)\(a\)\(4\)](#).

The Sterling 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. Pubic Comments
 - b. Cover sheet for AP
 - c. Tenant Satisfaction Survey 667 Program

State-Aided Public Housing Developments

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

Dev No	Type	Development Name	Num Bldgs	Year Built	Dwelling Units
667-01	Elderly	SHOLAN TERRACE 667-01	8	1969	40
Total			8		40

LHA Central Office

Sterling Housing Authority
100 Main Street, Leominster, MA, 01453-5599
Ben Gold, Management Agent
Phone: 978-537-5300
Email: Ben@leominsterha.com

LHA Board of Commissioners

	<u>Role</u>	<u>Category</u>	<u>From</u>	<u>To</u>
Carolyn Heimberg	Member		06/21/2021	05/31/2026
Robert Kneeland	Treasurer		05/14/2018	05/31/2023
Weymouth Whitney	Chair	State Appointee	05/31/2019	06/30/2021

Plan History

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

	REQUIREMENT	DATE COMPLETED
A.	Advertise the public hearing on the LHA website.	07/22/2021
B.	Advertise the public hearing in public postings.	07/22/2021
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.	07/22/2021
E.	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.)	09/22/2021
G.	Executive Director presents the Annual Plan to the Board.	09/22/2021
H.	Board votes to approve the AP. (For Boston Housing Authority, the Administrator approves and submits the AP.)	09/22/2021

Certification

CERTIFICATION OF LHA USER AUTHORIZATION FOR DHCD CAPITAL SOFTWARE AND HOUSING APPLICATIONS

I, Adam Gautie, Assistant Executive Director of the Sterling Housing Authority, certify on behalf of the Housing Authority that I have conducted an annual review of all Sterling Housing Authority users of DHCD Capital Software applications and Housing Applications and that all current LHA users are authorized to use the systems and have the appropriate level of user access based on their job responsibility. I approve all system access and access levels for all Sterling Housing Authority users.

This certification applies to the following applications:

- Capital Planning System (CPS)
- Consolidated Information Management System (CIMS)
- Cap Hub
- DHCD Housing Management Systems

I, Adam Gautie, Assistant Executive Director of the Sterling 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: 10/26/2021

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

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

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

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

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

The CIP includes the following parts:

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

Capital Improvement Plan (CIP)

Aggregate Funding Available for Projects in the First Three Years of the CIP:

Category of Funds	Allocation	Planned Spending	Description
Balance of Formula Funding (FF)	\$152,375.12		Total of all FF awards minus prior FF spending
LHA Emergency Reserve	\$15,237.51		Amount to reserve for emergencies
Net FF Funds (First 3 Years of the CIP)	\$137,137.61	\$139,598.35	Funds to plan & amount actually planned in the first 3 years of the CIP
ADA Set-aside	\$41.21	\$0.00	Accessibility projects
DMH Set-aside	\$0.00	\$0.00	Dept. of Mental Health facility
DDS Set-aside	\$0.00	\$0.00	Dept. of Developmental Services facility
Unrestricted Formula Funding (FF)	\$137,096.40	\$139,598.35	Funds awarded by DHCD to be used on projects selected by the LHA and approved by DHCD.
Special DHCD Funding	\$94,000.00	\$84,000.00	Targeted awards from DHCD
Community Development Block Grant (CDBG) Funds	\$0.00	\$0.00	Federal funds awarded by a city or town for specific projects.
Community Preservation Act (CPA) Funds	\$0.00	\$0.00	Community Preservation Act funds awarded by a city or town for specific projects.
Operating Reserve(OR) Funds	\$0.00	\$0.00	Funds from the LHA's operating budget.
Other Funds	\$0.00	\$0.00	Funds other than those in the above categories. See explanation below.
Total funds and planned spending	\$231,137.61	\$223,598.35	Total of all anticipated funding available for planned projects and the total of planned spending.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sterling Housing Authority participates in the Regional Capital Assistance Team (RCAT) program and project implementation responsibilities are as follows:

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

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

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

Capital Improvement Plan (CIP)

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

Cap Hub Project Number	Project Name	Development(s)	Total Cost	Amount Spent Prior to Plan	Remaining Planned for 2021	fy2022 Planned	fy2023	fy2024	fy2025	fy2026
282015	2008 FF Master CFA	SHOLAN TERRACE 667-01	\$9,251	\$9,250	\$0	\$0	\$1	\$1	\$1	\$1
282036	Pedestrian walkway repairs	SHOLAN TERRACE 667-01	\$76,342	\$0	\$0	\$0	\$73,422	\$2,921	\$0	\$0
282038	SUST. Bath fan installation	SHOLAN TERRACE 667-01	\$84,000	\$0	\$0	\$0	\$84,000	\$0	\$0	\$0
•	Pedestrian Walkway Repairs Phase 2	SHOLAN TERRACE 667-01	\$51,750	\$0	\$0	\$0	\$22,840	\$28,911	\$0	\$0
•	SUST. Air Sealing and Insulation	SHOLAN TERRACE 667-01	\$100,001	\$0	\$0	\$100,001	\$0	\$0	\$0	\$0
•	Window Replacement	SHOLAN TERRACE 667-01	\$124,703	\$0	\$0	\$0	\$0	\$11,506	\$113,198	\$0
TOTALS			\$446,047	\$9,250	\$0	\$100,001	\$180,261	\$43,337	\$113,198	\$1

FUNDS IN ADDITION TO ANNUAL FORMULA FUNDING AWARD

Cap Hub Project Number	Project Name	DHCD Special Award Comment	Special DHCD Awards				Other Funding			
			Emergency Reserve	Compliance Reserve	Sustainability	Special Awards	CDBG	CPA	Operating Reserve	Other Funds
282038	SUST. Bath fan installation	Bath Fans	\$0	\$0	\$84,000	\$0	\$0	\$0	\$0	\$0
TOTALS			\$0	\$0	\$84,000	\$0	\$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.

Sterling 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.

Sterling Housing Authority has requested \$100,000.00 in DHCD Sustainability funding for project #282-667-01-0-20-791, SUST. Air Sealing and Insulation. Reason: electric heat with 3-4" of insulation

3. Overall goals of the Housing Authority's CIP

We continue to focus on Asphalt repairs. we hope to move toward window replacement once the site repairs are complete.

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:

No major changes

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 04/30/2021.

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 06/01/2021.

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:

additional projects will be done once funds become available.

10. Accessibility

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

11. Special needs development

Sterling Housing Authority does not have a special needs (167 or 689 programs) development.

12. Energy and water consumption

Our 12 most recent monthly energy reports are for months 3/2020 to 2/2021.

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

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

No developments exceed threshold values.

No developments exceed threshold values.

13. Energy or water saving initiatives

Sterling Housing Authority is currently pursuing energy or water-saving audits or grants as noted. We have been in discussions with Sterling Municipal Light Company for energy saving grants and a sustainability request in this CIP.

AP-2022-Sterling Housing Authority-00365 had an energy audit under the Low-Income Energy Affordability Network (LEAN) program on 01/01/2020.

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.)

3% c. 667 (DHCD Goal 2%)

0% c. 200 (DHCD Goal 2%)

0% c. 705 (DHCD Goal 2%)

Sterling Housing Authority will address the excess vacancies in the following manner: Although our vacancy rate is very low, we continue to prioritize leasing up all units.

15. Vacancies

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

Maintenance and Repair Plan**Maintenance Objective**

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

About This Maintenance and Repair Plan

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

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

Classification and Prioritization of Maintenance Tasks

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

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

Emergency Request System

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

METHOD	CONTACT INFO.	TIMES
Call Answering Service	978-537-5300	4:01 p.m. to 8:29 a.m.
Call LHA at Phone Number	978-537-5300	8:30 a.m. to 4:00 p.m.

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 Sterling 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
Roof leak
Lock outs
Door or window lock failure
No heat
No hot water
Snow or ice hazard condition
Dangerous structural defects
Inoperable smoke/CO detectors, beeping or chirping
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	978-537-5300	4:01 p.m. - 8:29 a.m. M-F
Call Housing Authority Office	978-537-5300	8:30 a.m. - 4:00 p.m. M-F
Submit Online at Website		
Email to Following Email		
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: DHCD's usual on-site review for this housing authority's work order system was cancelled due to the COVID-19 emergency.

Work order classification used:

Emergency	
Vacancy	
Preventative Maintenance	
Routine	
Inspections	
Tenant Requests	

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

C. Our work order process includes the following steps:

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

Maintenance Plan Narrative

Following are Sterling 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?

This year due to COVID-19 we increased our labor hours for sanitation.

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

See above from Question #1.

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

To complete all deferred work orders due to COVID-19.

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	\$79,156.00	\$26,048.00
Last Fiscal Year Actual Spending	\$69,462.00	\$40,301.00
Current Fiscal Year Budget	\$80,008.00	\$0.00

E. Unit Turnover Summary

# Turnovers Last Fiscal Year	8
Average time from date vacated to make Unit "Maintenance Ready"	45 days
Average time from date vacated to lease up of unit	54 days

Attachments

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

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

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

Development	Category	Task	Service Type	Completed By	Task In
Sholan Terrace	Air Conditioning	Community Room On	Routine	Staff	Annual
Sholan Terrace	Air Conditioning	Community Room Off	Routine	Staff	Annual
Sholan Terrace	Building Envelope	windows	Routine	Staff	Annual
Sholan Terrace	Hot Water Tanks	Inspection	Routine	Staff	Annual
Sholan Terrace	Fire Alarm System	Inspection of Fire Panel and Devices	Routine	Contractor	Annual
Sholan Terrace	Fire Extinguisher	Inspection including fire blankets	Routine	Contractor	Annual
Sholan Terrace	Smoke Detectors and CO Detectors	Inspect and replace battery	Routine	Staff	Inspection
Sholan Terrace	Annual Unit Inspections	Unit Inspection	Routine	Contractor	Annual
Sholan Terrace	Lawn Mowers	Spring Service	Preventive Maintenance	Staff	Seasonal
Sholan Terrace	Snow Blowers	Fall Service	Preventive Maintenance	Staff	Seasonal
Sholan Terrace	Community Room	countertops, clean appliances	Routine	Staff	Weekly
Sholan Terrace	Community Room	Windows	Routine	Staff	Annual
Sholan Terrace	Dryer Vents	Clean	Routine	Contractor	Annual
Sholan Terrace	Gutters	Clean	Routine	Contractor	Annual
Sholan Terrace	Eyewash Station, First Aid Kits	Inspection	Routine	Staff	Annual
Sholan Terrace	Dumpsters	Clean	Routine	Contractor	Seasonal
Sholan Terrace	Buildings and Grounds	and signage	Routine	Staff	Annual
Sholan Terrace	Clean Staff Office	bathrooms, take out trash	Routine	Staff	Weekly
Sholan Terrace	Lawn Mowing and Shrub Trimming	shrubs	Routine	Staff	Seasonal
Sholan Terrace	Spring Cleanup	apply new mulch	Routine	Staff	Seasonal
Sholan Terrace	Fall Cleanup	Rake Leaves and Remove Branches	Routine	Staff	Seasonal
Sholan Terrace	Lighting	lighting	Routine	Staff	Weekly
Sholan Terrace	Laundry Rooms	trash	Routine	Staff	Weekly
Sholan Terrace	Septic System	Pump	Routine	Contractor	Annual

07/22/2021

3:20:00 PM

Adam

Filter group: BASE WO- Filters

Filter name: All Deferred Maintenance

H.M.S. for Windows
winWORK Work Orders
Work Order Summary Report

W.O. #	Work to perform	Tenant	Priority	Date Logged	Status	----- Charges ----- Tenant	Phone H.A.
46064	Livingroom / bedroom ceiling peeling Work Orders for	[REDACTED] 01/31/2020	D 1	01-31-2020	Open		[REDACTED]

Tenant Totals:

H.A. Totals:

Total # of WO: 1

07/22/2021

3:20:00 PM

Adam

Filter group: BASE WO- Filters

Filter name: All Deferred Maintenance

H.M.S. for Windows
winWORK Work Orders
Work Order Summary Report

W.O. #	Work to perform	Tenant	Priority	Date Logged	Status	----- Charges Tenant
46064	Livingroom / bedroom ceiling peeling Work Orders for	 01/31/2020	D 1	01-31-2020	Open	

Tenant Totals:

H.A. Totals:

Total # of WO: 1

Operating Budget

The tables on the following pages show the approved budget and actual income and spending per budget account (row) for the fiscal year ending 12/31/2020. 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.

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 Sterling Housing Authority operating reserve at the end of fiscal year 2020 was \$98,097.00, which is 83% 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 Sterling Housing Authority.						
REVENUE						
Account Number	Account Class	2020 Approved Revenue Budget	2020 Actual Amounts Received	2021 Approved Revenue Budget	% Change from 2020 Actual to 2021 Budget	2021 Dollars Budgeted per Unit per Month
3110	Shelter Rent - Tenants	\$196,878.00	\$210,830.00	\$209,105.00	-0.8%	\$435.64
3111	Shelter Rent - Tenants - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
3115	Shelter Rent - Federal Section 8	\$0.00	\$0.00	\$0.00	0%	\$0.00
3190	Nondwelling Rentals	\$0.00	\$0.00	\$0.00	0%	\$0.00
3400	Administrative Fee - MRVP	\$0.00	\$0.00	\$0.00	0%	\$0.00
3610	Interest on Investments - Unrestricted	\$10.00	\$440.00	\$625.00	42%	\$1.30
3611	Interest on Investments - Restricted	\$0.00	\$0.00	\$0.00	0%	\$0.00
3690	Other Revenue	\$2,500.00	\$2,212.00	\$2,500.00	13%	\$5.21
3691	Other Revenue - Retained	\$0.00	\$0.00	\$0.00	0%	\$0.00
3692	Other Revenue - Operating Reserves	\$4,640.00	\$0.00	\$13,572.00	100%	\$28.28
3693	Other Revenue - Energy Net Meter	\$0.00	\$0.00	\$0.00	0%	\$0.00
3801	Operating Subsidy - DHCD (4001)	\$38,563.00	\$26,048.00	\$0.00	-100%	\$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	\$242,591.00	\$239,530.00	\$225,802.00	-5.7%	\$470.42

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Sterling Housing Authority.						
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	\$0.00	\$0.00	\$0.00	0%	\$0.00
4120	Compensated Absences	\$0.00	\$160.00	\$0.00	-100%	\$0.00
4130	Legal	\$0.00	\$0.00	\$0.00	0%	\$0.00
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4150	Travel & Related Expenses	\$0.00	\$0.00	\$0.00	0%	\$0.00
4170	Accounting Services	\$7,561.00	\$7,560.00	\$7,788.00	3%	\$16.23
4171	Audit Costs	\$3,600.00	\$3,150.00	\$3,150.00	0%	\$6.56
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.00
4190	Administrative Other	\$45,040.00	\$37,697.00	\$40,911.00	8.5%	\$85.23
4191	Tenant Organization	\$250.00	\$0.00	\$0.00	0%	\$0.00
4100	TOTAL ADMINISTRATION	\$56,451.00	\$48,567.00	\$51,849.00	6.8%	\$108.02
4310	Water	\$7,710.00	\$9,325.00	\$6,785.00	-27.2%	\$14.14
4320	Electricity	\$55,350.00	\$41,204.00	\$49,275.00	19.6%	\$102.66
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 Conservation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4390	Other	\$2,500.00	\$1,700.00	\$2,300.00	35.3%	\$4.79
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.00
4392	Net Meter Utility Credit (Negative Amount)	\$0.00	\$0.00	\$0.00	0%	\$0.00
4300	TOTAL UTILITIES	\$65,560.00	\$52,229.00	\$58,360.00	11.7%	\$121.58

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Sterling Housing Authority.						
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
4410	Maintenance Labor	\$44,030.00	\$36,155.00	\$44,808.00	23.9%	\$93.35
4420	Materials & Supplies	\$8,126.00	\$7,626.00	\$8,200.00	7.5%	\$17.08
4430	Contract Costs	\$27,000.00	\$25,681.00	\$27,000.00	5.1%	\$56.25
4400	TOTAL MAINTENANCE	\$79,156.00	\$69,462.00	\$80,008.00	15.2%	\$166.68
4510	Insurance	\$6,400.00	\$6,928.00	\$8,433.00	21.7%	\$17.57
4520	Payment in Lieu of Taxes	\$0.00	\$0.00	\$0.00	0%	\$0.00
4540	Employee Benefits	\$21,976.00	\$18,420.00	\$19,625.00	6.5%	\$40.89
4541	Employee Benefits - GASB 45	\$0.00	\$467.00	\$0.00	-100%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$-2,014.00	\$0.00	-100%	\$0.00
4570	Collection Loss	\$0.00	\$366.00	\$0.00	-100%	\$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	\$28,376.00	\$24,167.00	\$28,058.00	16.1%	\$58.45
4610	Extraordinary Maintenance	\$26,048.00	\$40,301.00	\$0.00	-100%	\$0.00
4611	Equipment Purchases - Non Capitalized	\$1,500.00	\$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	\$38,634.00	\$0.00	-100%	\$0.00
4600	TOTAL OTHER EXPENSES	\$27,548.00	\$78,935.00	\$0.00	-100%	\$0.00
4000	TOTAL EXPENSES	\$257,091.00	\$273,360.00	\$218,275.00	-20.2%	\$454.74

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Sterling Housing Authority.						
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	\$242,591.00	\$239,530.00	\$225,802.00	-5.7%	\$470.42
4000	TOTAL EXPENSES	\$257,091.00	\$273,360.00	\$218,275.00	-20.2%	\$454.74
2700	NET INCOME (DEFICIT)	\$-14,500.00	\$-33,830.00	\$7,527.00	-122.2%	\$15.68
7520	Replacements of Equip. - Capitalized	\$0.00	\$0.00	\$15,000.00	100%	\$31.25
7540	Betterments & Additions - Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00
7500	TOTAL NONOPERATING EXPENDITURES	\$0.00	\$0.00	\$15,000.00	100%	\$31.25
7600	EXCESS REVENUE OVER EXPENSES	\$-14,500.00	\$-33,830.00	\$-7,473.00	-77.9%	\$-15.57

Explanation of Budget Accounts

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

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

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

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

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

3400: Administrative Fee- MRVP/AHVP: This account should be credited with Administrative Fees to be received for the MRVP/AHVP Program. The MRVP/AHVP administrative fee is \$50.00 per unit per month, as of July 1, 2020.

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

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

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

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

the 75% balance used to offset its need for operating subsidy. However, for the period 7/1/16 through 6/30/20, all deficit LHAs may keep 100% of the net meter credit savings, while they can keep 50% effective 7/1/2020.

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

3693: Other Revenue – Net Meter: This account should 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 6/30/20 all LHAs may retain 100% of their total net meter credit savings, and should report those savings as Other Revenue – Retained on line #3691. LHAs can keep 50% of savings effective 7/1/2020.

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

3802: Operating Subsidy – MRVP/AHVP Landlords:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4360: Net Meter Utility Debit/Energy Conservation: This account is to be charged with costs incurred for energy conservation measures.

4390: Other Utilities: This account should be charged with the cost of utilities which are not provided for in accounts 4310 through 4360. In addition, for all quarterly or year-end operating statements 9/30/20 or later, and all budgets 6/30/21 or later, please use this line to record the total net meter credits earned as reported in Line 4392, MINUS the Solar Operator Costs reported in Line 4391, with the result expressed as a positive number. For example, if you reported -\$20,000 in Net Meter Utility Credits in Line 4392 and \$15,000 in Solar Operator Costs in Line 4391, you would subtract the \$15,000 reported on Line 4391 from the -\$20,000 reported on Line 4392, and post the remainder of \$5,000 on Line 4360, as a positive number. This number essentially represents the "net" savings the LHA earned from its net meter credit contract.

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

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

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

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

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

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

4520: Payments in Lieu of Taxes:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7540: Betterments & Additions – Capitalized: This account should be debited with the acquisition cost (only the net cash amount) of non-expendable equipment and major non-routine repairs that are classified as a betterment or addition. These items meet the LHA's criteria for capitalization and will also be added to fixed

assets and therefore depreciated over the useful life of the asset. Examples are: major roof replacement, structural repairs such as siding, or major paving work.

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

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	<p>The rating is calculated using the following formula: (Total Number of Occupied units on Monthly Report divided by (Total Number of Units Minus Units that Received a Waiver Minus Number of Units Vacant less than 30 days on Monthly Report)</p> <ul style="list-style-type: none"> • “No Findings” : Occupancy Rate is at or above 98% • Operational Guidance: Occupancy rate is at 95% up to 97.9% • Corrective Action: Adjusted occupancy rate is less than 95%
Tenant Accounts Receivable (TAR)	<p>This criterion calculates the percentage of uncollected rent and related charges owed by starting with the amount reported by the LHA, as uncollected balances for the TAR (Account 1122 from the Balance Sheet) minus Normal Repayment Agreements* divided by Shelter (Tenant) Rent (account 3110 from the Operating Statement)</p> <ul style="list-style-type: none"> • “No Findings” : At or below 2% • “Operational Guidance” : More than 2% , but less than 5% • “Corrective Action” : 5% or more
Certifications and Reporting Submissions	<p>Housing authorities are required to submit 4 quarterly vacancy certifications by end of the month following quarter end; 4 quarterly operating statements and 4 Tenant Accounts Receivable (TAR) reports within 60 days of quarter end.</p> <ul style="list-style-type: none"> • “No Findings” : At least 11 of the required 12 reports were submitted and at least 9 were submitted on time. • “Operational Guidance” : Less than 11 of the required 12 reports were submitted and/or less than 9 were submitted on time.
Board Member Training	<p>Percentage of board members that have completed the mandatory online board member training.</p> <ul style="list-style-type: none"> • “No Findings” : 80% or more completed training • “Operational Guidance” : 60-79.9% completed training • “Corrective Action” : <60 % completed training

CRITERION	DESCRIPTION
Financial	
Adjusted Net Income	<p>The Adjusted Net Income criterion calculation starts with an LHA's Net Income and subtracts Depreciation, GASB 45 (Retirement Costs), GASB 68 (Retirement Costs), Extraordinary Maintenance (maintenance expense outside of routine/ordinary expenses), and Equipment Purchases – Non Capitalized. This Adjusted Net Income amount is then divided by the Total Expenses of the LHA. If this Adjusted Net Income amount is positive, it means underspending and if it is negative it means overspending.</p> <p>Underspending Rating:</p> <ul style="list-style-type: none"> • “No Findings” : 0 to 9.9% • “Operational Guidance”: 10 to 14.9% • “Corrective Action”: 15% or higher <p>Overspending Rating:</p> <ul style="list-style-type: none"> • “No Findings” : 0 to -4.9% • “Operational Guidance”: -5% to -9.9% • “Corrective Action”: -10% or below
Operating Reserves	<p>Current Operating Reserve as a percentage of total maximum reserve level. Appropriate reserve level is buffer against any unforeseen events or expenditures.</p> <ul style="list-style-type: none"> • “No Findings” :35%+ of maximum operating reserve • “Operational Guidance”: 20% to 34.9% of maximum operating reserve • “Corrective Action”: <20% of maximum operating reserve
Capital Planning	
Capital Improvement Plan (CIP) Submitted	<p>Housing authorities are required to submit a five-year capital plan every year.</p> <ul style="list-style-type: none"> • “No Findings” =Submitted on time and no modifications required or modifications made within 45 days. • “Operational Guidance” =Up to 45 days late and no modifications required or modifications made within 45 days. • “Corrective Action” =More than 45 days late or modifications required and not completed within 45 days.
Capital Spending	<p>Under the Formula Funding Program (FF), authorities receive undesignated funds to spend on projects in their Capital Improvement Plan. They are rated on the percentage of available funds they have spent over a three-year period</p> <ul style="list-style-type: none"> • “No Findings” = at least 80% • “Operational Guidance” = At least 50% • “Corrective Action” = Less than 50%

CRITERION	DESCRIPTION
Health & Safety	
Health & safety violations	DHCD has observed conditions at the LHA's developments and reported health and safety violations. The LHA has certified the number of corrected violations in each category.
Facility Management - Inspections	
Unit Inspections Conducted	<p>Housing authorities are required to conduct inspections of all their occupied units at least once a year</p> <ul style="list-style-type: none"> • "No Findings": 100 % of sampled units had inspections conducted once during the year • "Corrective Action": Fewer than 100% of sample units were inspected during the year
Inspections Report	<p>Housing authorities are required to note all of the deficiencies found during inspections</p> <ul style="list-style-type: none"> • "No Findings": 100 % of deficiencies are noted on inspection report • "Corrective Action": Fewer than 100% of deficiencies are noted in inspection report
Inspection Work Order	<p>Housing authorities are required to generate work orders for all deficiencies noted during inspections</p> <ul style="list-style-type: none"> • "No Findings": 100 % of deficiencies noted on inspection reports generated work orders • "Corrective Action": Fewer than 100% of deficiencies noted on inspection reports generated work orders
Work Order System	<p>Work order system identifies, tracks, and can produce reports for inspection work orders.</p> <ul style="list-style-type: none"> • "No Findings": Inspection work orders are identified, tracked, and reportable • "Operational Guidance": Inspection work orders are not identified, and/or tracked, and/or reportable
Inspections Work Orders Completed	<p>Inspection work orders were completed within 30 calendar days from the date of inspection, OR if cannot be completed within 30 calendar days, are added to the Deferred Maintenance Plan or included in the Capital Improvement Plan in the case of qualifying capital repairs (unless health/safety issue).</p> <ul style="list-style-type: none"> • "No Findings": Sampled inspection work orders were completed within 30 days of inspection date or added to deferred maintenance plan and/or CIP • "Operational Guidance": Sampled inspection work orders were completed within 31 to 45 calendar days of inspection date and not added to deferred maintenance plan or CIP • "Corrective Action": Sampled inspection work orders were completed in over 45 calendar days of inspection date

CRITERION	DESCRIPTION
Facility Management – Work Order System	
Emergency Work Orders Properly Defined	<p>Emergency work orders should be defined per <u>Property Management Guide</u>, identified, tracked, reportable.</p> <ul style="list-style-type: none"> • “No Findings”: Emergency work orders defined per <u>Property Management Guide</u>, identified, tracked, reportable • “Operational Guidance”: Emergency work orders are not defined per <u>Property Management Guide</u>, and/or identified, and/or tracked, and/or reportable
Emergency Work Orders Initiation	<p>Emergency work orders should be initiated within 24 to 48 hours.</p> <ul style="list-style-type: none"> • “No Findings”: Emergency work orders initiated within 24-48 hours • “Corrective Action”: Emergency work orders not initiated within 24-48 hours
Vacancy Work Orders	<p>Vacancy work orders should be identified, tracked and reportable.</p> <ul style="list-style-type: none"> • “No Findings”: Vacancy work orders identified, tracked AND reportable • “Corrective Action”: Vacancy work orders are not identified, and/or tracked, and/or reportable
Vacancy Work Orders Completed	<p>Vacancy work orders should be completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver.</p> <ul style="list-style-type: none"> • “No Findings”: Vacancy work orders are completed within 30 calendar days or if not completed within timeframe, LHA has a waiver • “Operational Guidance”: Vacancy work orders completed within 31-60 calendar days • “Corrective Action”: Vacancy work orders completed 61+ calendar days
Preventive Maintenance Program	<p>Housing authorities are required to maintain a comprehensive preventive maintenance program in which preventive work orders are identified, tracked, and reportable.</p> <ul style="list-style-type: none"> • “No Findings”: A comprehensive preventive maintenance program exists and work orders are identified, tracked and reportable • “Corrective Action”: A comprehensive preventive maintenance program does not exist OR work orders are not identified and/or tracked and/or reportable
Routine Work Orders	<p>Routine work orders should be identified, tracked, reportable and completed regularly.</p> <ul style="list-style-type: none"> • “No Findings”: Routine work orders identified, tracked, reportable and completed regularly • “Operational Guidance”: Routine work orders are not identified, and/or tracked and/or reportable, and/or completed regularly

CRITERION	DESCRIPTION
Requested Work Orders	<p>Requested work orders should be identified, tracked and reportable.</p> <ul style="list-style-type: none"> • “No Findings”: Requested work orders identified, tracked, reportable and completed regularly • “Operational Guidance”: Requested work orders are not identified and/or tracked and/or reportable, and or completed regularly
Requested Work Orders Completion	<p>Requested work orders should be completed in 14 calendar days from the date of tenant request or if not completed within that timeframe (and not a health or safety issue), the task should be added and completed in a timely manner as a part of the Deferred Maintenance Plan and/or CIP.</p> <ul style="list-style-type: none"> • “No Findings”: Requested work orders are completed within 14 calendar days of tenant request OR added to deferred maintenance plan and/or CIP • “Operational Guidance”: Requested work orders are completed within 15-30 calendar days from the date of tenant request • “Corrective Action”: Requested work orders are completed in over 30 calendar days from the date of tenant request OR not completed
Emergency Response System	<p>Housing authorities should have a 24 Hour Emergency Response System and distribute Emergency Definition to Residents, Staff, and Answering Service (if applicable).</p> <ul style="list-style-type: none"> • “No Findings”: A 24-hour system for responding to emergencies exists AND definitions of emergencies have been distributed to staff, residents and answering service, if applicable • “Operational Guidance”: System exists, but no definition has been distributed • “Corrective Action”: Neither a system nor distributed definitions exist

Policies

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

Policy	Last Ratified by Board Vote	Notes
*Rent Collection Policy	08/21/2003	
*Personnel Policy	02/17/2016	
*Capitalization Policy	03/16/2016	
*Procurement Policy	02/21/2018	
*Grievance Policy	08/19/2020	
Smoking Policy	02/17/2016	
Reasonable Accommodations Policy	12/16/2015	

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

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

Waivers

AP-2022-Sterling Housing Authorit-00365 has no current waivers from the regulations of the Department of Housing and Community Development (DHCD).

Attachments

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

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

- Pubic Comments
- Cover sheet for AP
- Tenant Satisfaction Survey 667 Program

Sterling Housing Authority Annual Plan Public Comments

Date: 09/22/2021

Time: 5:30 p.m.

The Sterling Housing Authority did not receive any public comments relating to the annual plan.

Resident Surveys – Background

Since 2016 DHCD has been working with the Center for Survey Research (CSR) 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). CSR surveys residents of elderly/disabled units (also known as c. 667 developments) and family units (also known as c. 705 and c. 200 developments).

During each round, all individual residents are mailed surveys, 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 residents was surveyed at each housing authority. This group was determined to be large enough to generate statistically useful results. In both rounds, responses from c.200 and c.705 residents are always combined together.

Round One Surveys (2016 – 2018)

In Round One of the surveys, CSR surveyed residents of elderly/disabled developments (c. 667) in three groups in the Fall of 2016, 2017 and 2018. CSR surveyed residents of family units (c. 705 and c. 200 developments) in the Spring of 2016. (Note: there are many more c. 667 units, so they were broken down into three groups).

Notes re: Round One Surveys

1. In previous publications of this survey data, if there were at least twenty responses from residents of an authority's c.667 units or from their c.200/705 units, then there is a separate report for that program.
2. However, to be consistent with the new Round Two methodology described below, we recalculated the Round One data using the new methodology. Since we no longer combine c.667 results with c.200/705 results, a number of LHAs no longer have a report for their c.200/705 units, given the small data set for those units.

Round Two Surveys (2019 – 2022)

Round Two of the surveys began in 2019. CSR surveyed about one-third of the elderly/disabled residents in Fall 2019 and all of the family residents in Fall 2020. We expect the remaining elderly/disabled residents to be surveyed in Fall 2021 and Fall 2022.

Notes re: Round Two Surveys

1. We refined our reporting methodology and will issue survey results for any program (c. 667 or c. 200/705) meeting these requirements:
 - 8-19 completed surveys received, if the response rate is at least 40%
 - 20-29 completed surveys received, if the response rate is at least 20%
 - 30+ completed surveys received, if the response rate is at least 15%
2. Responses from the family units will not be combined with responses from elderly/disabled units as they were in Round One. Since the variance between the results of the elderly/disabled and family programs was sometimes significant, combining the two was determined to yield less accurate results.

STERLING HOUSING AUTHORITY

Chapter 667 Housing Summary 2016 - 2017

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

Fall 2016:

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

Fall 2017:

- Surveys were sent to 6024 housing units (Chapter 667). 3391 surveys were filled out and returned.
- In the **Sterling Housing Authority**, surveys were sent to a total of **39** housing units (Chapter 667); **25** surveys were completed.

This report provides some information about how the residents from the **Sterling Housing Authority** who answered the survey responded. It compares their answers to those from residents in the entire state and to those from small LHAs in Central Massachusetts. These small LHAs in Central Massachusetts include: Acton, Auburn, Ayer, Charlton, Clinton, Concord, Dalton, Gardner, Grafton, Groton, Holden, Hopkinton, Hudson, Lancaster, Leicester, Littleton, Lunenburg, Maynard, North Brookfield, Northborough, Northbridge, Oxford, Pepperell, Shrewsbury, Southborough, Southbridge, Spencer, Sterling, Sudbury, Sutton, Templeton, Uxbridge, Webster, West Boylston, West Brookfield, Westborough, Westford, and Winchendon.

Communication

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

	Sterling Housing Authority	Small LHAs in Central MA*	Entire State
Contacted management about a problem or concern.....	68%	77%	77%
Felt they were usually or always treated with courtesy and respect when they contacted management.....	94%	90%	88%
Saw the Capital Improvement Plan.....	36%	35%	31%
Saw the Operating Budget.....	24%	21%	17%
Knew the Executive Director held a meeting with residents...	60%	56%	54%

* Small LHAs in Central Massachusetts include: Acton, Auburn, Ayer, Charlton, Clinton, Concord, Dalton, Gardner, Grafton, Groton, Holden, Hopkinton, Hudson, Lancaster, Leicester, Littleton, Lunenburg, Maynard, North Brookfield, Northborough, Northbridge, Oxford, Pepperell, Shrewsbury, Southborough, Southbridge, Spencer, Sterling, Sudbury, Sutton, Templeton, Uxbridge, Webster, West Boylston, West Brookfield, Westborough, Westford, and Winchendon.

Services and Programs

64% of the Sterling Housing Authority residents in Ch. 667 who responded to the survey said they would be interested in services and programs. Here are the services and programs residents said they would be most interested in participating in:

	Sterling Housing Authority	Small LHAs in Central MA	Entire State
Job training programs.....	0%	5%	6%
Money management programs (<i>budgeting, taxes, income building</i>).....	16%	10%	9%
Children’s programs (<i>tutoring, childcare, afterschool programs</i>).....	0%	1%	2%
Health and Medical Services (<i>visiting nurse, meal programs</i>).....	56%	34%	36%
Adult Education (<i>GED, ESL, educational counseling</i>)	4%	7%	10%

Maintenance and Repair

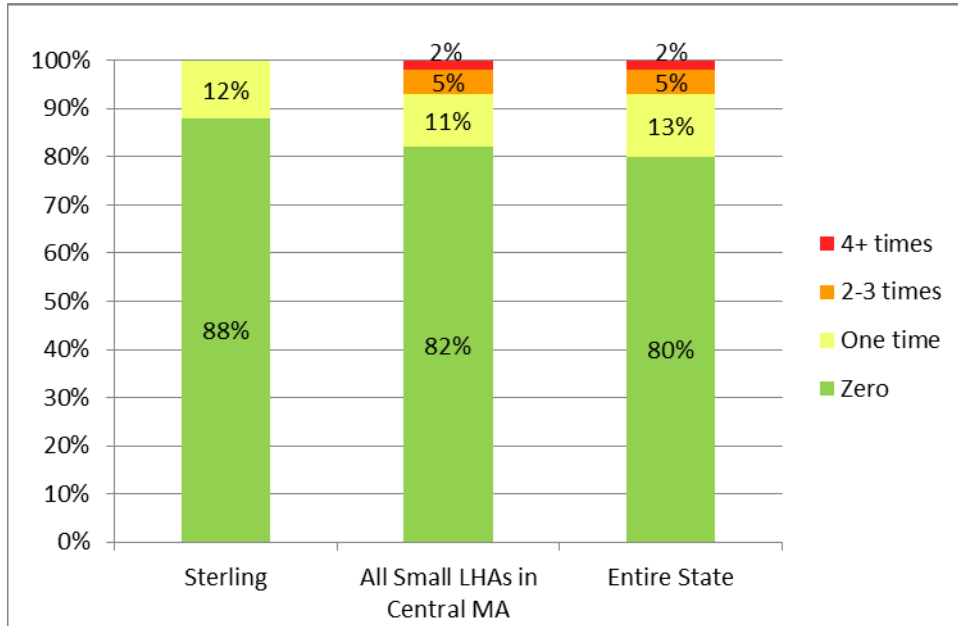
- **Who had problems?** About one-tenth of respondents had a problem with their heating and over half had a plumbing problem in the last 12 months.

	Sterling Housing Authority	Small LHAs in Central MA	Entire State
Had a heating problem.....	12%	18%	20%
Had a problem with water or plumbing.....	56%	47%	48%

- **Heating Problems**

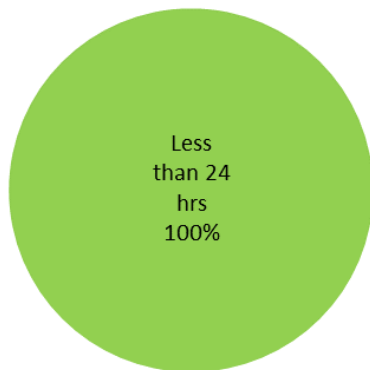
How many times did residents have heating problems?

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

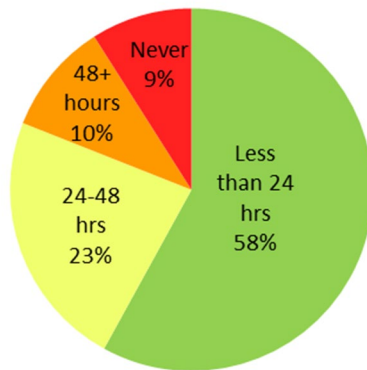


How long did it take to fix the heating problems? For those respondents who had problems, we asked how long it usually took for the problems to be fixed – less than 24 hours, 24 - 48 hours, more than 48 hours, or never fixed.

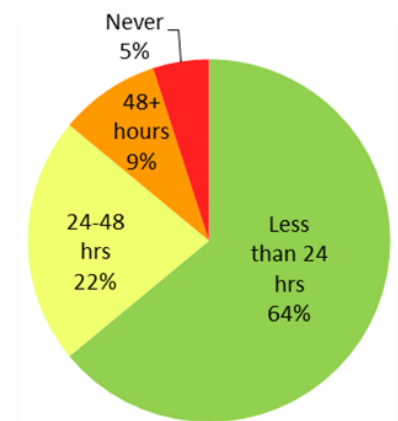
Sterling Housing Authority



Small LHAs in Central MA



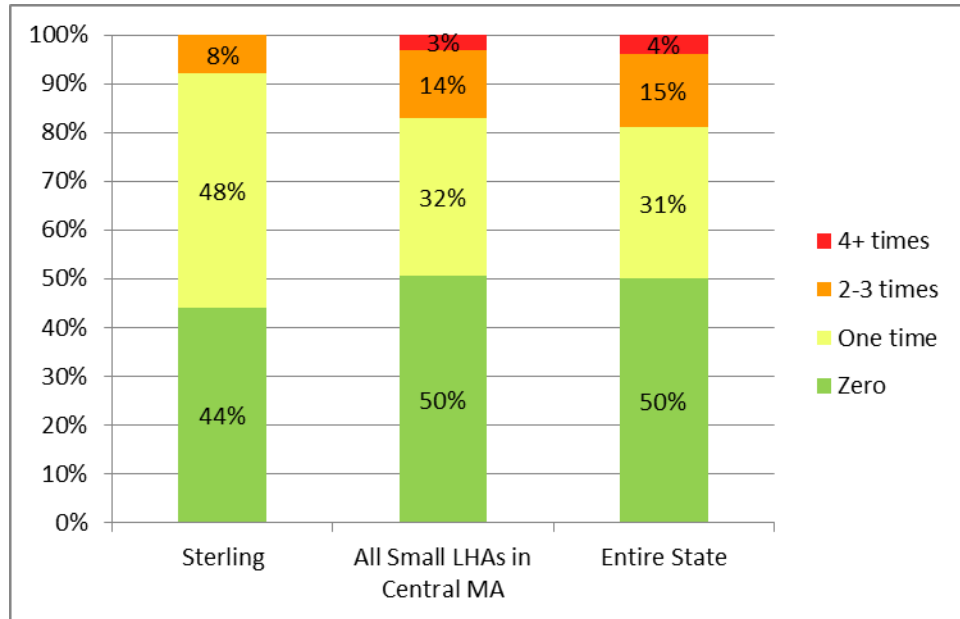
Entire State



- Water or Plumbing Problems**

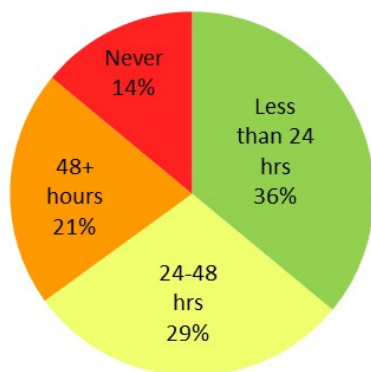
How many times did residents have problems with their water or plumbing?

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

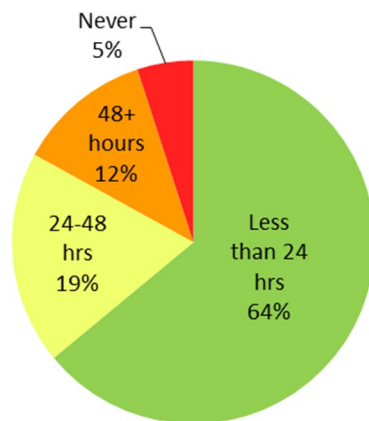


How long did it take to fix the water or plumbing problems? For those respondents who had problems, we asked how long it usually took for the problems to be fixed – less than 24 hours, 24 - 48 hours, more than 48 hours, or never fixed.

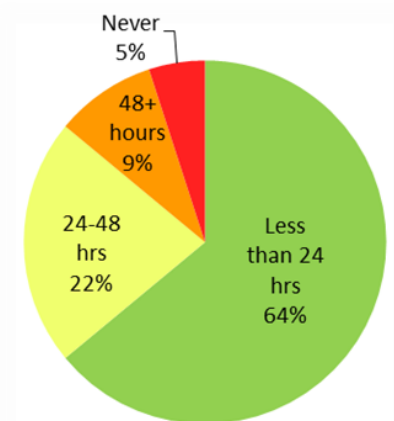
Sterling Housing Authority



Small LHAs in Central MA

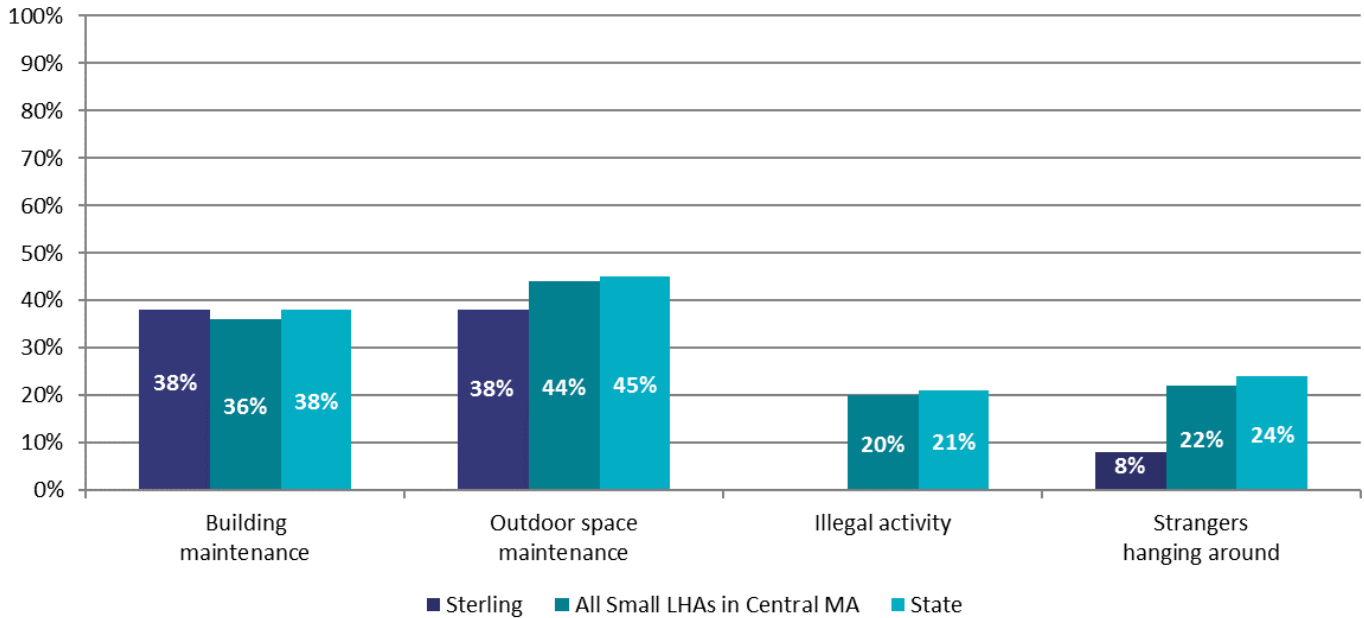


Entire State



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

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



Safety

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

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

