

Comments and Responses to the BHA FY 2027 State Annual Plan covering April 2026 through end of March 2027.

The following document contains the comments and responses received on the BHA's FY 2027 State Annual Plan covering April 1, 2026 to March 31, 2027. BHA staff met with the Resident Advisory Board from September through December discussing the Plan process and documents and sent copies of the Plan to the RAB and Local Tenant Organizations. The Plan was put out for public comment on November 1, 2025 and the comment period closed on December 15, 2025 with an in-person public hearing held December 8, 2025 at 11 AM at City Hall and an on-line public hearing held Dec 8, 2025 at 6 PM. The BHA took several steps to notify the public of the FY 2027 State Annual Plan and the opportunity to comment. The BHA placed an advertisement in the Boston Globe, included a notice with the rent statement of public housing residents, requested mixed finance partners to share the same notice with their BHA ACC-subsidized tenants, sent a mailing to Leased Housing participants in Boston and nearby towns notifying them of the Public Hearings and the proposed Plan. The BHA also sent letters to many local officials and advocacy groups. The Plan was made available for review at Boston Public Library Copley Square branch, BHA's headquarters at 52 Chauncy St., and on its website www.bostonhousing.org.

Overview and Certification

Comment: In general, as BHA staff noted at one of its fall RAB meetings, the State Public Housing Agency (PHA) Plan is not as user-friendly as it could be. BHA is not free to change the formatting or the content. EOHLC staff should engage with BHA and other stakeholders, such as Mass. Union of Public Housing Tenants (Mass. Union) to revise the Plan template so it can be more useful to public housing residents and local housing authority staff alike. And, as the federal model has shown, including a 5-year plan and progress report where each agency can establish longer term goals and objectives and then report on successes and barriers in achieving those goals, would help foster transparency, strategic planning, and resident engagement.

EOHLC's form notices should also give flexibility to housing authorities such as BHA who don't close out the public process with the public hearing, but leave a window for finalizing comments after the hearings. It may be that input is obtained at the public hearing which would influence the housing authority decision-makers to revise the submission. Information may come to light which requires follow-up, or those attending may wish to say more in writing based on what's disclosed at the hearing.

Response: Thank you for the comment. BHA staff would appreciate having flexibility to schedule the public hearing near the end of the 45 day comment period and not exactly at the end of 45 days.

Comment: Section 1 Overview & Certification: This does not include BHA's Mixed Finance state portfolio (West Broadway Homes, Camden Street, and Orient Heights), and it should. Similarly, as Faneuil is redeveloped, or as the BHA disposes of its scattered site Chapter 705 portfolio and repurposes it (such as to complete and develop additional units at Old Colony), these too should be accounted for, to the extent that they rely on State funding. As EOHLC revises its PHA Plan, it may want to consider what aspects of federal reporting on Mixed Finance redevelopment (including parallels to the RAD Addendum and the Demolition/Disposition tracking) should be included, as well as ensuring that technical assistance is provided for residents and there is compliance with the resident protection language of Section 35 of the Affordable Homes Act. We also recommend that BHA include more detailed information regarding its outreach to elected tenant organizations throughout the Annual Plan process, given the detailed tenant participation requirements of 760 CMR 6.09(3) and the diversity of elected tenant bodies within BHA.

Response: Thank you for the comment. The development information is provided by EOHLC. BHA staff would be happy to discuss the annual plan process with the RAB.

Capital Improvement Plan

Comment: On p. 2 of Section 2.1, is there a reason that planned spending is \$2 million less than the allocation?

Response: BHA certainly plans to expend its full allocation. The discrepancy here seems to be due to a glitch in the state Capital Improvements Plan ("CIP") template that is housed on an antiquated electronic data platform. (Our understanding is that EOHLC is retiring that platform in the coming months.) In the meantime, the Capital Improvement Plan, as generated by the state's data system (and as presented in the Annual Plan), exhibits multiple discrepancies. BHA intends to create its own version of the CIP to facilitate planning and communication. BHA's intention is to create its version of the CIP before the end of BHA's fiscal year, 03/31/2026. BHA will aim to present a draft to the RAB prior to its March 2026 meeting, and we would be happy to attend that meeting as well.

Comment: On p. 2 of Section 2.2, will the \$1 million to be spent at Monsignor Powers this year mean that the work is finally completed? Is there a balance that will then be reallocated, and

where (this shows that \$10.7 million was the total cost and that almost \$4 million was spent to date, but it is not clear if there was a \$10.7 million allocation.

Response: The work is nearing completion and will achieve a Final Certificate of Completion within the upcoming weeks. This project benefited from nearly \$5 million of non-EOHLC formula funding, which is why the CIP shows a total cost for \$10.7 million but only \$5 million from formula funds. (See page 8 of Section 2.2 which shows the non-formula funding to this project #035470.) There is not, therefore, a balance to be reallocated to other projects.

Comment: There should be consistency in reporting across Section 2.2. For example, earlier parts of the chart refer to specific developments, but later ones are not specific and require cross-referencing to know what's involved (for example, on p. 11, there is a reference to gas stove electrification at 200-7, and it should say Archdale).

Response: Yes, agreed. The CIP is generated from an antiquated state data base that BHA cannot effectively manipulate. The labels and other information are pulled from project-specific documentation in the state's CapHub project management system that have accumulated over many years with various naming conventions. (Admittedly, BHA could likely standardize and clarify our naming a bit more going forward. But as individual projects have years-long trajectories, it will take some time to standardize the records.) As mentioned above, BHA intends to create its own version of the CIP to facilitate planning and communication. BHA's intention is to create its version of the CIP before the end of BHA's fiscal year, 03/31/2026. BHA will aim to present a draft to the RAB prior to its March 2026 meeting, and we would be happy to attend that meeting as well.

Comment: The justification for the Alternate CIP (providing scheduling flexibility) on p. 1 of Section 2.3 makes sense. If EOHLC allows it, BHA may want to move to a reporting system similar to that it has used for its federal sites, which allows resident leaders to track overall spending allocations over a number of years and work items (both projected work over the 5-years and items that were recently completed). As provided for in the BHA Monitoring Committee legislation, there should be reporting to residents where there is significant reprogramming. This can be justified due to unforeseen emergencies, but residents deserve to know if original plans and timelines shift and when to expect items to be completed.

Response: Thank you for this comment—BHA very much agrees. As we have described elsewhere in BHA's federal Five-Year Annual Plan (and other documents and in presentations to the RAB and Monitoring Committee), BHA aims to create a transparent set of capital planning tools to facilitate resident engagement and prudent planning.

Comment: BHA refers, on p. 2 of Section 2.3, to the retirement of a designer and the need to restart some of the project submissions, which will be done in a plan revision. Can BHA provide more specifics here as to which sites/projects and the anticipated timeline for the revision?

Response: This statement on page 2 of Section 2.3 in fact dates back to last year. The designer in question did indeed retire and several projects were subsequently relaunched over the course of 2025. BHA will highlight the project changes in the version of the CIP that we present to residents in March 2026.

Comment: Page 3 of Section 2.3 notes that BHA is unable to include all of its high priority 1 and 2 projects due to limited funding. Can BHA provide a list (and estimated cost) for the items which were not included? Were any of these accessibility-related? Is there any potential for EOHLC, City, or other sources to address these needs? On page 1 of the same section, item #2 indicates that BHA has not requested additional state funding that may be available “for projects that qualify as emergencies, required legal compliance upgrades, or sustainability improvements.” Clarification here would be helpful.

Response: The statement was indeed a holdover. BHA has revised it slightly. That said, we are aware that there are always priority projects that we cannot budget for given funding constraints—even given the additional funding received in 2025. We aim to present a clearly picture in the version of the CIP that BHA issues before 03/31/2026. BHA received news of additional state funding in recent weeks such as \$19 million in EOHLC funds to support phase one at Faneuil Gardens—to match significant local funding commitments. Accessibility is always a top priority, as are energy efficiency improvements and renovations to boost safety, convenience and general quality of life. BHA will aim to expand on these and other initiatives as we update our own capital planning documents.

Comment: Page 4 of Section 2.3 refers to upgrades affecting energy or water utilization at “Developments 601 and 602”, but it is not clear which sites are covered by this.

Response: Those are the state’s labels for Franklin Field state family and elderly developments.

Comment: Page 4 of Section 2.3 refers to vacancy rate goals and performance. BHA addresses a slight shortfall in Chapter 200 vacancies (and that it anticipates improved performance in the coming months), but it is silent on a similar shortfall for Chapter 667 units. For both of these, BHA should update its data by the time of submitting the plan to EOHLC in January 2026 to see if the goals are met. For the Chapter 705 program, while the high vacancies are related to an overall disposition strategy, there should be details on the overall accomplishments to date and the timeline for completion.

Response: Thank you for the comment. BHA has continued to fill vacancies following capital repairs and unit turnover. We expect that the vacancy figures will show further improvement in 2026. Furthermore, we will aim to include details about our c. 705 (scattered-sites) initiatives—which include disposition of 5 long-term vacant units, and replacement of 25 units as part of the new construction at Old Colony Phase 6, which completed construction in December 2025. BHA is pursuing homeownership initiatives involving some of the c. 705 properties. BHA will highlight the c 667 units in the version of the CIP that we present to residents in March 2026.

Maintenance and Repair

Comment: As we have noted in prior years' submissions, the Preventive Maintenance Guide, which is a lengthy document, indicates that it is a work-in-progress, but there is no red-lining to permit the reader to know what content is new (and what has been removed). This should be done.

Response: Thank you for your comment. The PM Guide describes the procedures required to maintain the building systems and components present at each of the BHA properties. As these are technical guides, they are largely unchanged from year to year. However, BHA plans to review and make revisions over the coming fiscal year and will share any proposed changes with the BHA Monitoring Committee, the Resident Advisory Board, and with residents of any BHA properties potentially impacted.

Comment: We understand that, at EOHLC's prompting, BHA has decided to utilize a Deferred Maintenance Plan for items best completed when a unit is vacant, during particular seasons, where there is insufficient funding at the moment, where it would be more efficient to group work by location, task, or trade, or where there are competing priorities or staff availability (for example, staff are currently focused on vacancy turn-around, but will be free in a few weeks to tackle a matter). All of this makes sense, as long as there is a plan to complete outstanding work and the BHA ensures that there is overall compliance with work-order and vacancy turnaround performance measures. Moreover, if this is resulting in disparate treatment across sites, this obviously would be cause for concern, and BHA staff must be prepared to present a reasonable plan for each site to resident leaders.

Response: Thank you for your comment. The BHA's goal is to continue to improve maintenance delivery, build on the gains made in this area, and to continue to complete open work orders as quickly and efficiently as possible. While items may be placed in Deferred status as recognition that they are unlikely to be done within EOHLC's 14-day timeframe, it is not BHA's intention to deprioritize open work. Open items in deferred status will be reviewed regularly and their completion times will be monitored, city-wide and at the site level, along with all other work orders.

Operating Budget

Comment: This is the area of greatest concern in any of the material provided. The Plan states, on p. 1 of Section 4.1, that the BHA's Operating Reserve at the end of 2026 was \$0.00. Earlier on the page, EOHLC says that housing authorities are expected to maintain a minimum operating reserve of 35% of one half of the previous year's operating expenses to cover any unplanned but urgent needs. It states further that if the reserve is between 20-35%, prior written approval must be obtained from EOHLC. If the balance is below 20%, operating reserve funds can only be spent on health and safety issues. This is shocking that the BHA has no operating reserves. Is this true? What is the reason, and is there a plan to change this?

Response: Thank you for the comment. The operating budget information in the draft plan was inaccurate. EOHLC and BHA staff are working on correcting the information. BHA has submitted the FY2026 budget to EOHLC in December and it shows an Operating Reserve Balance at the end of the budget year. As the plan process moves forward, BHA will update the RAB. BHA attached the proposed State Program Budget to Other Elements so residents and the public can see what BHA has submitted.

Comment: In our comments on the draft FY26 Annual Plan shared by BHA last year, GBLS had noted that the information provided for the Annual Operating Budget (showing 2024 approved revenue budget and actual expenditures in comparison with FY2025 amounts) appeared incomplete, as the FY2025 figures were all listed as zeros. BHA's response to our comments was that "FY25 Budget has not been approved by EOHLC. It is still a work-in-progress and will be provided once it is finalized." Oddly, the current FY2027 draft Plan budget table displays only figures for FY2026 (approved revenue budget and actual amounts spent) in comparison with FY2027 budget figures, which do appear complete. In other words, there is a year-long gap for which no data is available to compare FY2025 and FY2026 figures. What happened here? We presume that FY2025 and FY2026 budgets were approved at some point after submission of last year's Plan; if so, it would be helpful for BHA to provide updated information for those periods.

Response: See above response.

Comment: Additionally, comparison of the Operating Budgets provided for last year's FY2026 Plan and the current FY2027 draft shows that the figures for every single line item in the first two columns of the tables (for approved and actual amounts in FYs 2024 and 2026, respectively) match exactly, to the dollar. This would be an extraordinary coincidence. Can BHA verify that these figures are correct?

Response: See above response.

Comment: Moreover, on p. 5 of the FY2027 Plan, there is a notation that BHA had \$33 million in revenue, but \$82 million in expenses, and a net deficit of over \$49 million. On p. 4, it appears that most of the additional general expenses are under “other general expenses” (going from an approved budget of a little under \$1 million to over \$48.8 million. (There are some increases in expenses shown on page 3 in the areas of utilities and particularly compensated absences (going from \$0 in the projected column to over half a million in the expense column).

Response: See above response.

Comment: Unfortunately, given the framework that EOHLC uses, while there is an explanation of budget accounts, this is a generic EOHLC explanation, and is not an explanation of how the BHA developed these large holes in its budget. Does the BHA need to go back into receivership? Let’s hope not. It may be that the discrepancies/coincidences discussed above have something to do with the lack of Operating Reserves shown in the draft FY2027 Plan. Please respond in great detail as this is an area of great concern for the BHA’s stability.

Response: See above response.

Performance Management Review

Comment: This covers both a narrative response to findings (pages 5 of 10), and then, at the end of the overall PHA Plan, 10 pages of EOHLC surveys in a number of areas and findings. It is not clear if there are 5 pages missing here (pages 6-10), and it would be far better to have these all together in one location.

Response: EOHLC puts the sections in their order and EOHLC numbers the pages. The complete Narrative Responses to Performance Management Review is included on pages 1-5 and then EOHLC provides an Explanation of PMR Criteria Ratings and it should be pages 6-10.

Comment: The BHA was required to provide corrective action on tenant accounts receivable for all of its state public housing programs and was given Operational Guidance for its Occupancy Rate for its Chapter 667 units. For rent collection, EOHLC said that BHA needed to adhere to its rent collection policy and lease (with notices sent to non-compliant tenants early and frequently), to enter into written out-of-court and court repayment agreements, to set reasonable thresholds for commencing legal action, to evaluate the vacated balances to better

understand what is collectible and what is unlikely to be collected, and to review aged receivable reports regularly. The PMR, however, is not clear what the issue was on the Chapter 667 occupancy rate or what the Operational Guidance said, and this should be clarified (see also discussion in Section 3, above). In response to the finding, BHA pledged to step up rent collective efforts. (See discussion elsewhere on rent collection under the federal PHA Plan, including the discussion that BHA and the RAB had in March 2025.) BHA has a robust history of tenancy preservation and homelessness prevention. At the same time, it is important that balances not build up, and that realistic out-of-court repayment arrangements be pursued to avoid the collateral consequences of court involvement for future housing prospects. There are times when there may be factors that should offset some or all of the rent owed in developing negotiated resolutions (e.g. conditions of disrepair, rent calculation errors, etc.). Also, in some circumstances a disability or other circumstances may interfere with timely recertification, leading to balances that are higher than they should be. A number of cases may fit into “good cause” criteria for purposes of RAFT funds and G.L. c. 239 sec. 15.

Response: Thank you for your comments. The indicator measures the arrearage built over the course of multiple years, and will take time to reduce. BHA continues to prioritize rent collection, and is following recommendations provided by EOHLC, but recognizes that significant progress will take time. BHA remains committed to tenancy preservation, and actively pursues court agreements to preserve at-risk tenancies whenever possible. However, BHA is not currently entering into Management agreements, and is only offering court ordered repayment agreements.

BHA received a rating of Operational Guidance for occupancy in the Chapter 667 portfolio because the occupancy rate for the year was less than 98% (96.3%). There were no written PMR recommendations on this item, but EOHLC and BHA remain engaged on the topic of maximizing occupancy and, specifically, some of the challenges of housing elders in our properties that include 2nd floor walk-up units.

Comment: The other area where BHA received a Corrective Action finding had to do with reporting on vacancies and work orders. As BHA staff noted in their presentation to the RAB on December 4, 2025, the report was early in 2025, before the BHA had fully rolled out its new tracking system for work orders and vacancies, and there have been marked improvements in this area (see federal 5-Year Progress Report comments, above). BHA obviously needs to be vigilant for both its federal and state units, but we are hopeful that this disappears as a concern in future assessments.

Response: Thank you for your comment. This PMR indicator has improved from the previous fiscal year’s result despite the rating, and it is worth noting that this is an “all or nothing” indicator, wherein a single exception results in a rating of “Corrective Action” instead of “No

Findings”. This threshold leaves no room for error and poses a significant challenge for larger housing authorities, but BHA will continue working to improve performance in this area.

Policies

Comment: Some of this doesn’t seem accurate. BHA has revised its Language Access approach since 2014, as appears in its regular reports in conjunction with the federal PHA Plan, and it would help to review this and see if it’s still accurate. The Anti-Discrimination/Harassment Policy here has a date of October 2013, but there is later a reference to a 2019 sexual harassment policy—these are all together as one policy and should use the 2019 date. We are not familiar with the 2004 Resident Maintenance and Citation Policy or whether it’s available on BHA’s website. BHA also has Mixed Finance Resident Grievance and Resident Participation MOAs which should be referenced for any sites that have gone through Mixed Finance redevelopment.

Response: The BHA Language Access Plan was updated in 2014; BHA staff provide data on language access services but that is different than changing the policy. BHA staff considers the Anti-Discriminatory Harassment Policy to come under the Civil Rights Protection Plan. Staff will take the comments under advisement.

Waivers

Comment: This refers to BHA’s long-standing waivers to utilize a consolidated Admissions and Continued Occupancy Policy (ACOP), as well as a Tenant Grievance Policy, which vary somewhat from the EOHLC standard policies. In addition, BHA should reference its public housing lease (which differs somewhat from EOHLC requirements and is supplemented by an EOHLC addendum as needed), and its Resident Participation Policy of 2023 (referenced in Section 6), which differs slightly from EOHLC protocols in order to have a uniform approach for both federal and state sites.

Response: Thank you for the comment.

Other Elements (Tenant Satisfaction Surveys, PMR Report)

Comment: Resident Surveys: We have chosen not to comment on this, since there is nothing new since prior submissions. We would ask when EOHLC is likely to take up the balance of Round Three (2023-2027), since this only refers to the partial survey of 1/3 of the elderly/disabled and family units in the fall of 2023. As with resident surveys in BHA's federal portfolio, for future surveys we urge BHA to work with EOHLC to take steps to ensure that surveys reach a representative sample of people served by BHA who have communications challenges (those of limited literacy, with mental health or cognitive disabilities, limited tech abilities, limited English proficiency, or the like), and to assist those residents in relaying their experiences to the BHA.

Response: Thanks for the comment.

Comment: RECOMMENDATIONS ON IMPROVING MECHANISMS FOR PUBLIC AND RESIDENT PARTICIPATION IN THE ANNUAL PLAN PROCESS: The following suggestions are not commentary on the substance of the Annual Plans, but proposals for how BHA might facilitate access to materials and encourage more meaningful participation in the public review process. We acknowledge, at the outset, the clear efforts by BHA staff to ensure full access to Plan materials and provide timely notice of public hearings and comment periods to residents, the RAB, and other stakeholders in the community. Recommendations here are meant to enhance rather than criticize these efforts.

Many if not most members of the public with an interest in providing commentary are likely to access the materials online through BHA's website. Given the volume of material contained in the state and federal Annual Plans, the appearance and organization of the relevant webpages is critical for ensuring meaningful access.

Response: Thank you for your comment. BHA staff appreciate the engagement of residents and advocates in the plan process.

Comment: The main Annual Plan webpage (linked here) is visually confusing and should be revised.

Spacing, font sizes, and text effects such as bolding and underlining are inconsistent. Font sizes and text effects should be streamlined throughout. Underlining should be used sparingly to indicate links, rather than for emphasis. Users should be able to click immediately on the document title listed, rather than having to read through extraneous text such as "To see the [xxx], click here". Explanatory text should be visually distinguishable from document titles.

This webpage overall simply displays too much material at once without allowing the user to minimize irrelevant material. Adding dropdown functions (permitting the user to click on a heading to show or hide text beneath) could help.

Information about current and upcoming comment periods and scheduled hearings should be displayed prominently near the top of the webpage.

Response: BHA staff from Operations and Communications will carefully review these comments and plan to make changes to the portion of the website dedicated to annual plans prior to the next annual plan cycle. Staff have begun work and agree with the commenter that the plan information can be better organized and more consistent in terms of presentation.

Comment: BHA should reorganize this webpage so that the user need not scroll through excessive text to find materials. The page should include a main menu that clearly displays headings for each major element: currently effective plan(s), pending draft plan(s), past/archived plans, upcoming hearing/comment deadlines, as well as some brief introductory information about each element to guide the user to their desired location.

Response: See above response.

Comment: State Annual Plan 2024 review completed and draft State Plan 2025 [this links to a separate webpage dedicated to State Annual Plan material but again refers to outdated materials instead of either the currently effective or currently proposed plan].

Response: BHA provides access to current approved plans, proposed plans, as well as an archive of previous plans on the website. Staff will work to make sure links are working and improve organization so users easily find the information they are looking for.

Comment: The first main heading below the main menu (The Federal Five-Year and Annual Plan and Amendments and State Annual Plan) includes general information about annual plans, and provides helpful context. However:

The second paragraph is simply an explanation of what documents are available further down on the page, including the currently effective and proposed federal plans; there should be anchor links included with these references.

The third paragraph both provides helpful background information on the state Plan and provides the only link on the page to access currently effective and pending state Plan materials, as well as archived materials. Consolidating this information on a separate webpage is helpful; however, the link is provided in a non-prominent location in small body text near the end of the paragraph and is thus too easily overlooked.

Response: Thank you for the comments. Staff are working to better organize the plan section of the website. Staff increased the font size of the state plan link.

