

Comments and Responses to the BHA FY 2021 Federal Annual Plan.

The following document contains the comments and responses received on the BHA's FY 2021 Federal Annual Plan. 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, 2020 and the comment period closed on December 15, 2020 with a virtual public hearing held on zoom December 7, 2020 at 11 am and another at 6 pm.

The BHA took several steps to notify the public of the FY 2021 Federal 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, sent a mailing to Leased Housing participants in Boston and nearby towns notifying them of the Public Hearing and the proposed Plan Amendment. 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.

Many comments are specific to Plan attachments:

AP: Annual Plan template
5Y: Five-Year Plan Progress Report
RAD: RAD attachment
S: Supplement

Five-Year Plan Progress Report

Comment: (Lsd Hsg and RED) PHA Plan Supplement, 5-Year Progress Report, etc.: BHA has included a number of sites where it either has or anticipates submitting demolition/ disposition proposals to HUD. Often these can be complex and may extend over multiple phases (Charlestown, Mary Ellen McCormack, Hailey Apartments), or may involve tricky issues of "turning on" Section 8 subsidy if tenants are not currently in right-sized units (Lenox Street), and all LTOs and residents need good explanation about how this will work and revisions to bylaws, etc. BHA, GBLs, and City Life/Vida Urbana have the ISHI collaboration which has looked at these issues at Lenox Street, Orient Heights, and Amory Street to help develop a "tool kit" for residents to be better empowered in the redevelopment process. There should be a commitment to develop a set of Mixed Finance

Management protocols regarding lease & tenancy/continued occupancy issues to supplement what's already been developed on Tenant Participation and Grievance protocols, and would make clear to residents/LTOs what expectations are for the new owner/manager, for BHA Leased Housing, and for BHA oversight.

Response: BHA agrees that a set of model management protocols is a valuable additional supplement to the materials already developed. BHA and our ISHI collaboration partners have been working with BHA residents on exactly such a tool, and we look forward to finalizing a model document.

Comment: (Lsd Hsg) 5Y: There is no discussion of the pandemic and the challenges inherent in this unique year, and this should be included in the beginning and as it may relate to the topics. Moreover, there is also the dilemma of fully utilizing but not losing resources. For example, there has been some discussion that BHA is unlikely to have enough Section 8 resources in FY 2021 to be able to promptly meet all PBV resources, or to allow PBV participants who have been in occupancy for over a year and in good standing to exercise mobility choice options. BHA has had the challenge, with the Small Area FMR program, to

help expand housing opportunities to many communities but at the same time to manage costs and serve as many families as possible.

Response: There have been a number of challenges related to the pandemic, namely determining how to continue to conduct business and utilize vouchers while most business had to be conducted remotely. BHA was fortunate enough to already have a remote computing system in place that allowed us to pivot to remote operation fairly quickly. Additionally, BHA was able to utilize much of its funding through supported housing partnerships, where homeless families and individuals were referred to the BHA. In order to fully utilize voucher funding in one funding year, there is often a chance that BHA can end up in a shortfall position in the following calendar year, limiting the issuance of vouchers and entering into PBV contracts. This is mostly due to the way HUD provides funding, where calendar year funding is often not fully understood until the end of the 1st quarter, making it difficult to fully plan the expenditure of funds. The BHA has seen incremental changes in the zip codes that people have begun to choose and some of that can be credited to Small Area FMRs. The BHA recently hired a Director of Landlord Recruitment and Housing Search to build on

some of the successes that have been achieved in expanding choices for voucher families.

Comment: (Ops) On 5Y p.3, it is not clear what BHA's current performance is in terms of what the overall percentage of occupancy is, or how many sites are not performing at the goal. This discusses strategies to improve performance, but not what the actual performance is (and this should be refined by site). BHA has, however, indicated that there are real problems with performance in its state Chapter 200 program (vacancy rate at 7%). It's also not clear what the plan is for Charlestown after relocation needs for Phase1 are met. Simply keeping the site off-line indefinitely could have a negative impact as vacancies grow at the site and affect quality of life. On the other hand, this may expand the number of households with "rights of return" to include families newly housed on the site after Sept. 2019. The item on Quality Control inspections by senior staff is important, but it shouldn't go here—this is really a separate performance measure that was long a BHA and HUD standard.

Response: Currently, BHA has an adjusted occupancy rate of 96.2% for the federal properties it owns. When the public housing units at redeveloped properties are included, the

occupancy rate rises to 96.7%. The state portfolio does have a 7% actual vacancy rate when no adjustments are made for units approved to be vacant or to serve a DHCD approved purpose. These are units that are either approved for modernization work, demolition for redevelopment, used by BHA for office space, or a maintenance function. After adjusting for these units, BHA has a 96.7% occupancy rate in the state portfolio.

BHA is evaluating the vacancy situation internally at Charlestown and will look for ways to balance the requirements of relocation and the need to house families from the waiting list. Quality Control is part of strategy of vacancy reduction goal.

Comment: (Lsd Hsg) 2. On 100% utilization of Section 8 resources (p. 3), it is not clear what BHA's statement means. What is the baseline number of vouchers? Is this saying that BHA, despite building up a 10% reserve with the help of CARES Act funds, is likely to exhaust those reserves next year? What will it mean that BHA will utilize 98% of the unit months available? Does this mean that anyone's voucher will be rescinded for insufficient funds? BHA should explain this in terms that the RAB, advocates & members of the public can understand.

Response: No one is expected to lose their voucher, however, the BHA does expect to be in a shortfall position next year, meaning that we are likely to spend more money than has been budgeted for 2021. This means that BHA will apply for available shortfall funding from HUD, which is likely to be awarded and has been historically, so long as we follow the HUD requirements for shortfall eligibility, including a cessation on issuing new vouchers or entering into any new PBV contracts.

Comment: (Lsd Hsg & Ops) On high performer status (5Y p. 3), what are the latest scores for PHAS and SEMAP? BHA has had a good record with SEMAP, and high-performer status should continue; PHAS, on the other hand, has been more problematic. While what's listed here may help, it would be good to know the specifics scores and then BHA's response to improve any indicators where not high-performing.

Response: BHA's overall SEMAP score for the fiscal year ending 03/31/2019 was 100% so BHA remained a High Performer. BHA's most recent PHAS score is 76, issued after FY17. In recent years, decreasing federal funding for traditional public housing has made it a challenge to attain higher scores, as the Financial indicator makes up 25% of the

PHAS score. As BHA's reserves and liquidity have diminished, so has the financial indicator score. This makes it difficult to make gains despite a relatively consistent performance on the other indicators that are more directly within the agency's control (Management, Capital Fund, and Physical Inspections).

Comment: (Ops & RED) Under formulating asset management staffing and systems (5Y p. 4), while the examples of the new budget management templates and regular staffing meetings are promising, they do not show how this is operationalized, particularly in the balance between assets which remain within BHA's portfolio on new subsidy platforms and assets which are managed by others where there is periodic BHA oversight—and particularly where there may be a number of years of rehabilitation and relocation to be managed.

Response: BHA agrees that a variety of tools are needed given the different types of assets—e.g., sites that remain under direct BHA management vs. sites that are privately owned but subject to BHA oversight—and given the fact that conversions and redevelopments often occur over a period of many years even at a single site. For that reason staff aim to develop and refine a variety of templates. Those are exactly the types of

tools we will continue to work on during the biweekly meetings and will share in future 5-Year Plan progress reports. Asset management staffing and systems are a work in progress.

Comment: (Ops & RED) Under providing for BHA's financial stability and preserving public housing character and tenant protections into the future (5Y p. 4), financial stability and community stabilization are separate and distinct goals. BHA obviously has a need to insure that it can still deliver the same number (or more) of deeply affordable units within available resources. This by and large means arranging for conversion to Section 8 and tax credit resources where possible. However, there is a stiff competition for such resources, and BHA normally has to do significant capital work so that funding can be approved. This carries with it complicated financing and regulatory changes, relocation needs, and the need to build and maintain resident trust through what can be a stressful process. BHA needs to also decide what within "public housing character" it wishes to preserve. This is a good discussion of the ISHI collaboration. BHA has been willing to advocate for the carryover of key tenant protections with its developer partners and for collaboration with GBLs and City Life on

developing a good toolkit that can be replicated at different sites.

Response: BHA staff agree with the comment and are fully committed to working with tenants and partners to ensure that tenant protections carryover when properties are converted.

Comment: (Capital) On the completion of portfolio wide capital needs assessments not already slated for redevelopment, and the development of strategic plans for funding those needs (5Y p. 4), it would be good for BHA to share what it has so far with the RAB and affected LTOs, so that people can see what this involves, and to schedule future meetings to go over the remaining assessments between now and the end of 2021. City and legislative leaders should also be brought into the loop to provide necessary feedback and support.

Response: Currently 15 Sites are under contract to prepare capital needs assessments (CNA). A few of these CNA's have been completed, and some of them are for sites that are already planned for some type of conversion. The balance of the first 15 CNAs should be completed near the end of April 2021. A second set of CNA's are planned through another

contract to be completed (for approximately 25 remaining sites) by the end of December 2021. Capital Construction and Real Estate Development (where Conversion and/or Demo/Dispo is being considered) can meet with the RAB sometime in June 2021 to share the first set of CNA's results/information. A second meeting with RAB to review the second set of CNA results could occur in Nov/Dec of 2021 as part of the Annual Plan Review for 2022.

Comment: (RED) On the adding of new deeply affordable units where possible (5Y pp. 4-5), BHA points to the example of use of vacant land at Mary Ellen McCormack and 125 Amory St., as well as net increases in PBV units in Old Colony Phase 3 and J.J. Carroll. Some of the additional affordable units may not be Section 8 (such as the homeownership units at Clippership) but should still help serve City interests. BHA will need to think about this as well as it looks to place the off-site deeply affordable units in conjunction with Charlestown redevelopment.

Response: Yes, BHA will continue to align our development work with the efforts of the City of Boston to deliver new affordable housing. With respect to the Charlestown replacement units specifically, BHA makes an unequivocal commitment to delivering those

deeply affordable units, as we see them as replacement units for existing public housing and not simply additions to the broader community's stock of affordable housing.

Comment: (RED) On reduction of carbon emissions, sustainability, and climate resiliency (5Y pp. 5-6), in addition to listing the heating, hot water, and sealing work to be done at Codman, Frederick Douglass, Hampton House, Washington Manor, and J. J. Malone, it would be good to know what particular goals are likely to be achieved at each site (in comparison to 2008 usage) and how far this will enable the BHA to achieve the 38% reduction goals. The piece on Monsignor Powers, as well as CHARM, likely should go in the State agency plan (since this is a state site). The examples given on climate resiliency are interesting but don't appear yet to be an agency strategy, which should be developed over the next year.

Response: We appreciate these comments. BHA will work over the coming 1-2 years to better quantify carbon emission reduction strategies on a site-by-site basis. Also—as suggested—we will continually look for ways to implement new strategies informed by ongoing research in the climate resiliency field. Finally, we appreciate the reminder to

include items specifically related to BHA's state portfolio in our state annual plan too (in addition to including them in the 5-year Plan Progress Report). We will work on adding mention of these items to the proposed or a future state plan if they are not already there.

Comment: (Lsd Hsg) On application for additional vouchers as opportunities arise (5Y pp. 6-7), this is a good discussion of what additional resources (Mainstream and VASH) BHA has obtained or is pursuing, as well as increases in Family Unification Program (FUP) utilization. BHA may want to supplement this with a discussion of Family Self-Sufficiency, as well as any success/challenges with its use of Section 8 mitigation vouchers (where used to serve non-elderly disabled applicants who have longer public housing waiting list periods due to the revised Designated Housing Plan).

Response: Thank you for the suggestion.

Comment: (Lsd Hsg) On maintaining high occupancy rates in the PBV portfolio while decreasing turnover times (5Y p. 7), would the Owner Portal just provide a mechanism for BHA to track referrals to owners, or would it also provide for owner access to data/sharing? If the latter, while there might be some

efficiencies there, there would also be some dangers because not all owners apply the same screening factors. As currently designed, if a referred applicant who has met BHA basic screening is rejected by an owner, this does not affect the applicant's ability to be considered by another owner, and the other owner would not know about the rejection. It is only when BHA rejects an applicant, or a fully cleared applicant rejects a placement without good cause, that this would result in the applicant being removed from all lists.

Response: Thanks for the comment. This would solely be a tool for tracking referrals. This is one of the deficiencies in the current system as most of the tracking is done by emails and with such a large number of waiting lists, it has become difficult for BHA to follow up with owner's to be sure that they are continuing to screen referred clients. Thanks for your comments on screening and information sharing which we will consider if this evolves into something else.

Comment: (Lsd Hsg) On 5Y p. 7, optimizing use of PBVs to preserve and create affordable units (p. 7), it is heartening to hear of the preservation efforts at Forbes, Newcastle-Saranac, and Mercantile Wharf through the use of 100 project-based vouchers. Are there any other Section 13A properties in

Boston where BHA intends to use vouchers in a similar manner? It would help to know what the demand and availability is so that this can be considered as a priority. It would also be good to know more about the Jamaica Plain site with the mix of 106 PBV and Mainstream vouchers, as well as the 15 vouchers for individuals in recovery at Quint Avenue; how were those properties previously used and how did they become available?

Response: There are no additional 13a properties in Boston that BHA is aware of. With respect to Quint Ave and the Jamaica Plain project, they were awarded to Allston Brighton CDC and Pine Street Inn respectively. Quint Ave was recently purchased by ABCDC and the Washington Street property in Jamaica Plain is owned by Pine Street Inn but being converted from a warehouse to residential apartments for low income families and individuals.

Comment: (Lsd Hsg) On 5Y pp. 7-8, discussion of the Expanding Choice in Housing Opportunities (ECHO pilot program, as well as use of Small Area FMRs to expand housing opportunities, this discusses aiding 122 families with counseling and moves—is this the number of planned units, or is there higher issuance of vouchers than the expected level of lease up? It

would help to know what the scale is expected to be for the pilot and what the benchmarks/evaluation points will be to determine if the pilot has succeeded and whether it should be expanded. We strongly favor what BHA has done on SAFMR, but recognize that there are cost and program sustainability issues (see above) that will need to be monitored. HUD has also made some additional funding available for mobility programs—is BHA pursuing any of these? How long ago was the new Director of Housing Search hired, and what progress has been made to date with these items and what concrete goals would BHA hope to achieve by the end of FY 2021?

Response: The ECHO pilot program was designed to serve existing voucher holders seeking to relocate with their voucher. The 122 families represents about fifty percent of families that expressed initial interest in making a move and receiving support through ECHO. BHA is seeking to expand those interventions that were successful through the ECHO pilot program to the larger portfolio where economically feasible. One of the major changes we anticipate for 2021 is to ensure that voucher holders are provided information on neighborhood choice through a BHA developed software and

are provided a briefing session prior to being able to submit moving papers, but are also given information on moving at various touchpoints as they interact with BHA, including annual and interim recertifications. The Director of Housing Search, Joanea Spender was hired in September and is working on these operational changes as well as the implementation of the Owner portal and landlord recruitment and marketing materials.

Comment: (Res Cap) On 5Y pp. 8-9, rebuilding resident capacity programs, it should be recognized that it has been a challenge for BHA to do this in the midst of the pandemic when in-person larger meetings are not possible. BHA staff have demonstrated leadership in trying to grapple with these challenges, get resident leaders the tools they need to participate virtually, and has been maintaining a good pace of regular workshops and check-ins. There are also challenges since some resident leaders unfortunately have passed away and vacancies need to be filled and reports still completed. BHA (and HUD and DHCD) have intelligently responded through waivers, use of CARES funds to foster communication, additional staffing, and proposed revisions to the Tenant Participation Policy. (There is also a good discussion later on 5Y p. 10

about the use of additional stipends for residents who were interested in capacity building and engagement work as well as for COVID response (such as food distribution that has been key in Boston's public housing communities).

Response: BHA appreciates this comment and plans to continue to build upon the progress it has made this year towards increasing resident capacity despite the challenges related to the pandemic.

Comment: (Res Cap & RED) On 5Y pp. 9-10, institutionalizing resident protections and participation in all redevelopment, and advance internal BHA systems to ensure long-term compliance by new owners, we very much value the time BHA staff have put into the ISHI collaboration, and hope to see additional protocols and tools be available to tenant leaders not only at the affected sites but throughout BHA's redevelopment efforts.

Response: BHA agrees with this comment and also looks forward to utilizing the outcomes of the ISHI collaboration to inform development of additional tools and protocols related to resident protections and participation.

Comment: (Admin) On 5Y p. 10, improve voter registration through recertification, given

what occurred this year with COVID-19, as well as a variety of voting reforms, it will make sense to revisit all of this in 2021, but it was not practical to tackle this in 2020.

Response: BHA does plan to revisit implementing voter registration through recertification in 2021.

Comment: (Lsd Hsg) On 5Y p. 10, Family Self-Sufficiency, it would help to know if this may be used in particular PBV sites, since there is some interaction between these programs and program/development cap rules.

Response: PBV participants may participate in the FSS program.

Comment: (Ops & Lsd Hsg) On 5Y p. 10, proactively plan for future staffing in light of repositioning, this intersects with what the strategy is for repositioning. If, as with the proposal for the BHA's elderly/disabled portfolio, more of the repositioning will be "in house", then BHA staff would be providing the direct management at the sites, rather than contracting it out to private development partners. If, on the other hand, outside partners are managing the properties, then BHA staff will be involved both with subsidy administration and with ensuring that owners are complying with their ground leases and other development

agreements. There should, however, be similar expectations of high performance and placing of residents first. How many staff are expected to retire in this year and the next? Are there job reclassifications that will help staff feel that they are growing professionally and personally? Is there a good loop for incorporating resident feedback?

Response: BHA is working on plans for future staffing in light of repositioning. BHA staff are developing new job descriptions and is in conversation with unions. There will be opportunities for professional development. There will always be transition that BHA needs to deal with annually. See next response about communications tools.

Comment: (Admin & Ops) On 5Y p. 10, under communications tools and information systems, there is reference to a Request for Proposals to implement automatic texting, robocalling, and emailing capabilities for better and timelier communications. It would help to know when this is expected to be launched and what particular sorts of communication BHA would utilize this for in its public housing and Leased Housing Programs, as well as how it may be integrated into Mixed Finance operations (or be part

of what is required for private partners with whom the BHA contracts).

Response: BHA expects to launch tools/software programming that allows for better and timelier communication with residents and voucher holders in 2021 and is in process of procuring this technology now. It is anticipated that these tools will be used to communicate varied content – 1) at a development site level when there is a maintenance issue, such as an elevator down 2) across a larger section of the population if there is an emergency 3) to let residents/voucher holders know of potential opportunities available to them 4) on an individual level for appointment reminders and confirmations. BHA needs to further discuss how such a tool would be applied at mixed finance sites but overall believes this tool will be beneficial in enhancing communication with the constituents it serves and is open to ideas/suggestions.

Comment: (Finance) On 5Y pp. 10-11, this references BHA's implementation of an on-line rental payment and automated demand debit rental payment system for residents who opt in. This was very timely, as this came on board just as the pandemic broke. How has this gone—has there been any evaluation, and any problems that need to be addressed?

This also refers to the digital transfer of public housing files—this can be key to allowing remote access to information about how rent is set/adjusted. How far has this gone, and is there a period by which this may all be implemented? Are there sufficient funds for this? Can CARES Act funds be used for these purposes? This section also refers to BHA switching to a virtual appointment system. In some cases, there may be advantages to continuing the availability of such options even as in-person meetings may eventually be permitted. Thus, there are tenants who work during the day, or who may be homebound, but who are able to participate in phone or computer chats and exchange of data electronically. It would help to know when the resident portals might be available that would permit tenants to update their financial information or to put in work order requests.

Response: The on-line rent payment is a small but growing number of residents. There will be a mailing about the on-line payment option to further promote resident awareness. BHA is in final stages of contract award for more robust electronic communications with residents. BHA is evaluating continuing virtual meetings with residents. Staff are gathering information about ways that residents can and want to communicate with staff. Most

of resident files have been converted to electronic files which has been key in allowing remote access to information.

Comment: (Admissions) On 5Y p.11, streamline and simplify application processes, we agree with BHA's efforts to simplify the application and verification process, as reflected in the proposed Amendment 1 to the PHA Plan and the related changes to the Admissions and Continued Occupancy Policy (ACOP) and the Section 8 Administrative Plan. By what date does BHA plan to have its web-based federal applicant portal in place. The idea of virtual viewing of units is interesting. However, this is no substitute for knowing what the actual unit looks like, and applicants should still be given the benefit of the doubt where their actual views indicate that there are good reasons why a unit is not acceptable (unit deficiencies, failure to eradicate pests, etc.) Similarly, when the goal discusses help to be given to applicants who will be housed soon, it must be recognized that many applicants lack the equipment or the skills to readily negotiate certain systems, and/or may have additional barriers of limited English proficiency or disability, and that staff (and helping agencies) must be available to help those who need it.

Response: With virtual viewing of a unit, BHA staff want applicants to be able to see a unit quickly in addition to coming in person to see a unit. It is a convenience, not a substitute. The same is true of other aspects on the lease-up process- virtual and in person options will be offered.

Comment: (Admissions) On 5Y pp. 11-12, simplify applicant and resident forms, improve marketing materials and briefings, we recognize this can be a challenge. For example, it took our office a number of sessions with BHA staff and residents to come up with satisfactory materials related to relocation options and how the Section 8 PBV program would work at Charlestown. However, that was a good exercise in balancing getting people the right information they needed, in plain language, to make meaningful choices without overwhelming them. It would be helpful to review the on-line briefing session and the simplified Leased Housing forms. We've discussed with BHA developing "user-friendly" versions of Tenant Empowerment materials to supplement more complex legal documents. It would be helpful to know what videos have been developed, and It may be that recertification interviews or the execution of initial Section 8 lease documents/family obligations could be tackled so that this seems less daunting

for residents. We would be happy to review revisions to the application form.

Response: The BHA will be working on streamlining the application process putting applications online and hopefully making the process smoother. We also hope to implement a system that allows BHA families to complete BHA forms and upload documents to the BHA. BHA is interested in continuing to improve upon forms and procedure to make processes more transparent for all. We can walk through existing forms and procedures or begin drafting new procedures and forms based on feedback from the RAB and what a good starting point may be.

Comment: (Lsd Hsg) On 5Y p. 12, improve property owner recruitment and retention strategies, it may be good for BHA to brainstorm with other PHAs and the City's Office of Housing Stability (OHS) about what has been successful. For example, Metro Housing Boston routinely recognizes landlords at its annual meeting or highlights what certain owners have done in its newsletter. BHA may want to recognize those who've been willing to take the pledge not to displace tenants while COVID-19 relief is made available or owners who've pledged to maintain longer-term affordability (such as the Morton Village example

highlighted in the Globe recently). When does BHA expect the on-line owner portal to be available, and can some of the data here also be made available to tenants so they are not at a disadvantage (inspection results, information on rent increase requests, information where BHA is considering but hasn't yet finalized a rent adjustment)? The move to a biennial inspection system is welcome; for self-certifications on repairs, it would help to know more, so that BHA is not merely accepting an owner's statement that an item is remedied where that has not been verified in some way.

Response: Thanks for the comment. The Owner Portal is now live and landlords are enrolling. We appreciate the comment on the Owner Portal with respect to processes that the tenant should know about and can work with the software vendor to see if that can be incorporated. With respect to self-certification of inspections repairs, the tenant is also required to sign off and BHA will continue to conduct quality control inspections to verify repairs.

Comment: (Admin & Ops) On 5Y p. 12, provide additional opportunities for customer feedback, it would help to know the results of the texting survey for voucher participants—how many participants, what was

asked, and what responses were received. BHA should share ideas on other surveys for tenants, applicants, and owners with the RAB to get their thoughts, as well as their results.

Response: BHA staff intends to have a survey and will surely share with the RAB and welcome their feedback.

Comment: (RED & Ops) Finally, there's a lot of good stuff that BHA has put in its plan and in its progress report and so-forth about the continued collaborations that it has with its resident task forces and various community partners about resident empowerment and around tenant participation. We've been working actively with the BHA and with other community partners like City Life/Vida Urbana about that. We were just hoping that, perhaps as one of the goals that could be included in the progress report, would be – we've done stuff on tenant participation, we've done things on mixed-finance grievance procedure, but just to add to that: mixed-finance management protocols. I know we've got some work in progress on that now. I think it's going pretty well. Maybe if we can just commit to that as a new goal for over the next year. That's just the last thought.

Again, I wanted to thank everybody at the BHA and for the opportunity to speak tonight.

Response: Thank you for this comment. BHA sees the mixed-finance management protocols, currently in draft form, as a very valuable addition to our collective planning and development toolkit. We wholeheartedly commit to the goal of finalizing this tool in the coming year—and look forward to reporting on the final document in next year's Progress Report.

Admissions (formerly Occupancy):

Comment: S: P.4: As GBLS has noted in the past, there is a mismatch between the number of the income eligible Asian families in Boston (roughly 9.4% of the population) and on the BHA's Section 8 waiting lists (roughly 1.1%). BHA's public housing waiting lists shows a better match between the eligible population and waiting list composition (12.3%). It would be helpful to know whether BHA thinks that the change in priorities/preferences proposed in the FY 2020 amendment will address this discrepancy; if it does not, BHA will need to take other steps to analyze and address the discrepancy.

Response: Thanks for the comment. The BHA is hopeful that the change in priorities will be helpful to better matching waiting lists with the demographics of the eligible population. If it does not, we plan on taking additional steps including potential additional changes to the policy and also outreach to underrepresented community advocates and organizations.

Comment: S: On p.5, the number of families on the public housing waiting list has increased from over 38,000 to over 40,000, but the annual turnover increases from 1,200 to 1,700 units. BHA should explain the reason for this change in anticipated turnover.

Response: The table has been updated by MIS. Annual turnover is an estimate.

Comment: S: On pp. 8-9, the language does not appear to be consistent. Page 8 seems to reflect a reduction in the specifically described set aside programs (consistent with the FY 2020 amendment), but then p. 9 seems to bring back that list.

Response: The change in language here is related to change in the Administrative Plan. Rather than detailing the supportive housing set aside agreements, the plan is to cite them generally in the

Administrative Plan and provide the supporting agreements and MOAs on the BHA website. The language her in the supplement should retain the program names.

Budget

Comment: AP: BHA indicates that there were no negative audit findings. As in the past, the RAB would ask to review any audits that have come out since last year's review.

Response: BHA staff would be receptive to such a request from the RAB.

Capital

Comment: One page wide spreadsheet: Even if a development may be undergoing redevelopment, it may be a number of years before work is completed, and basic systems work may be needed to maintain the property until there can be demolition & building of replacement housing.

Response: Agree with this assessment as Charlestown and MEM have been planned for redevelopment since 2015 and planned phasing is still in

progress with an agreement yet to be executed between BHA and the Developer

Comment: So there are items listed here for: Charlestown (domestic hot water plumbing re-roof buildings, replacing horizontal plumbing, and DHW replacement)

Response: These are minimum projects that are required to keep occupied units safe and habitable during phased redevelopment of Charlestown. Currently there are 1100 units. As the phased construction continues, each phase may take 2 years to complete and there may be 500 plus units occupied over 3 to 4 phases of redevelopment.

Comment: McCormack (HVAC boiler replacement, stair pan repairs, replacements & finishes (listed twice), repair/repaint masonry, facades and/or replace parapets, replace electrical switchgear, DHW replacement, HVAC boiler replacement).

Response: These are minimum projects that are required to keep occupied units safe and habitable for the residents during phased redevelopment of McCormack. Currently there are 1016 units. As the phased construction continues, each phase may take 2 years or more to complete and like Charlestown there may be 500 plus units occupied over 3 to 4

phases of redevelopment. We currently have over 60 heating boilers, and DHW equipment which is on a schedule for replacement as MEM heating was decentralized in early 2000 (thus the equipment is 20 plus years old). Likewise existing electrical transformers were installed in 1996 and a few transformers have failed.

Comment: Old Colony (Anne Lynch (repair existing site sidewalks, paving & curbing)).

Response: This is work in the last phase (Phase 3C or 4) between Mercer, 8th Ave, Old Harbor and Columbia Road and is for maintenance and safety.

Comment: One page wide spreadsheet: The window replacement, stair hall, roofing, stucco repairs, and common area finish items for J. J. Carroll must be errors, since the entire site is being torn down soon.

Response: These projects listed were part of previous 5 year plan. It is correct that BHA intends to remove J.J.Carroll from the public housing portfolio, which is expected to happen in early 2021. At that point these Capital Projects will be deleted and Funding will be reassigned to Contingency to be used for another capital project.

Comment: One page wide spreadsheet: Since Eva White is slated for a RAD conversion,

should the items here (replace/repair roof, masonry/façade/parapet repair, fire alarm replacement, and boiler replacement) be in the capital budget?

Response: Eva White did not qualify for RAD this year. Currently there is an emergency safety repair at the Parapets of Eva White as there has been some spalling of the parapet to the ground. Additionally the Fire Alarm Panel has failed, and replacement is necessary. While BHA does continue to pursue a RAD (and/or Section 18) conversion for Eva White, our intention is to renovate the property, as opposed to demolishing it—meaning, in other words, that this work will be done either under the Capital Plan or in the context of an upcoming conversion.

Comment: Would these be switched out once a RAD conversion proposal is approved by HUD?

Response: Yes, upon conversion, any unspent funds budgeted in the public housing Capital Plan will be reallocated to other sites.

Comment: One page wide spreadsheet: Since Patricia White has a Section 18 conversion proposal pending at HUD, shouldn't the items here (regarding roof, interim repair/replacement, and elevator upgrades) come off the

public housing capital budget, unless HUD does not approve the demolition/disposition proposal?

Response: These projects listed were part of previous 5 year plan. The Demo/Dispo is pending. The disposition of the property out of the public housing program has only just recently been completed—at the very end of December 2020. With the disposition now complete, these Capital Projects will be deleted and Funding will be reassigned to Contingency to be used for another capital project.

Designated Housing

Comment: (CCECR & Admin) S: On pp. 76-78, Section 17, BHA notes that it sought and obtained a two-year extension from HUD on its Designated Housing Plan in June, 2020. The Designation includes updated statistics from October 1, 2020 regarding the affected sites, but also reflects the fact that sites may come off this list as they are converted from public housing to other types of assistance.

Response: Thank you for your comment. The Designated Housing Plan is inclusive of only Federal Elderly/Disabled

sites/units. As sites/units convert from Federal public housing sites to other (non-federal public housing) subsidy platforms, such as Section 8 PBV, they will no longer remain under the Designated Housing Plan. Upon conversion of any of the affected sites/units, an amendment to the Designated Housing Plan will be requested.

Grievance Procedures

Comment: (also Lsd Hsg) S: On pp. 35-36, Section 5.C., would recommend adding the Mixed Finance protocols (different grievance procedure and tenant participation documents for those sites), as well as additional protocols that are currently being worked on.

Response: BHA staff will take the comment under advisement.

Comment: (also Lsd Hsg) S: On pp. 37-38, Section 6A and 6B, this should be revised to reflect that BHA did, in FY 2020, implement the changes in the grievance procedure, but also made additional changes to reflect COVID-19 adaptations (generally requiring that grievances be handled by hearing officers rather than by panels). For 6B, it should be noted that the Mixed Finance Grievance Procedure adds certain grievance rights for

Section 8 project-based tenants in Mixed Finance sites beyond those contained in the Section 8 Administrative Plan. (The Administrative Plan addresses hearings that BHA would have regarding rent determination or termination of assistance, and the Mixed Finance grievance procedure for eviction or other rights with the property manager.)

Response: BHA staff will take the comment under advisement.

Leased Housing

Comment: S: On p. 29, Section 4.B.(1)a., text has been revised to reflect the BHA's use of payment standards based on the Small Area Fair Market Rent (SAFMR) or FMR, depending on current market rental data, and that payment standards are designed to provide access to rental units in the majority of the jurisdiction.

Response: Thank you for the comment.

Comment: Thank you. This is my first time attending this meeting and I'm not real sure exactly what I can discuss. But I wanted to mention about parking for tenants, like

especially in the west end because there's no residential parking. And where there is a garage – a facility for other residents that can afford it – people with vouchers, they cannot afford the parking. And, like, my particular rent doesn't cover the whole entire maximum of my payment standard for this area, and I wanted it to be considered – if it could be applied towards, like, the parking at a subsidized amount to be applied towards my rent in total, or something affordable that I could park my vehicle. That's one of the major questions I had.

And the other one had to do with inspections denying rent to be paid by Boston Housing Authority, even though it's beneath the housing standard – the payment standard. Like for example, if the payment standard is \$2,700 for 02114, and the apartment is, say, \$2,500 or so... I had an experience where it's been denied and it's below the payment standard, and it's a brand new building. So, I didn't understand why I was redirected to a lower – to something I really didn't want. What I wanted, what I chose, but it was denied even though it was beneath the payment standard. I did not understand that. That's my question because it seems like with that type of policy or that type of arrangement happening, we could be easily redirected anywhere they want us to go;

we don't have no freedom to choose where we want to live. So, I wanted to address that.

Response: On the question about parking, which I don't know that I'll be able to answer without getting some more details from you offline. So, I can send you my email address in the chat, and my phone number in the chat function here, and then we can connect offline about the parking situation.

On the second question about payment standards and rent reasonableness and how that all ties in. The BHA sets its payment standards by zip code. In each zip code, we try to look at what like the median market rent is there so that each zip code has accessible – units that are accessible for a voucher holder, or are within the price range that a voucher holder can afford with their voucher. So even with that payment standard that we set, we have to look at the market rent or the rent reasonableness for each specific apartment. So for every single apartment we look at, we're looking at units in the building, or comparable units in the building, and comparable units in the immediate vicinity right around the building that are of similar size to make a judgment about what the maximum rent that the landlord should get in that particular situation.

What also factors into that equation is whether or not the family is responsible for utilities or not. So, sometimes the owner is asking for what we determine, based on the current data that we have, to be an unreasonable request and we either have to ask them to come down in their request or, unfortunately, sometimes we do have to deny the apartment because the owner is requesting a rent that is not in line with the market. So, we try to exercise flexibility. We continue to evaluate the data in each zip code to make sure that there's a number of apartments that are accessible and affordable to our families. But again, I think as families come across those individual situations, we are willing to take second looks at those types of situations because we do want families to be able to live

Comment: Comment continued: Can I say something, Sir? Because I understood what you said, but it didn't seem fair to me because this is a brand new building. Over here where I'm staying is brand new. It was built I think in 2018; it's only two years old. So, the unit that I wanted had a better view where I would have been able to – for me, because I have somewhat a phobia of people looking in my apartment, that kind of thing. I was forced to go to a unit with another building where everyone could see in my bedroom and my living room.

That's not what I wanted for my well-being because I am sensitive to that kind of thing. I just couldn't understand it because the unit that I wanted was below the \$2,700. It was like I had no power. I didn't know who to go to; how to advocate for myself. I know in some cases you can go to Boston Housing Court – I mean the Housing Court for certain things. But I noticed that they had full power over me and I had no fighting chance for nothing. I couldn't go to the Housing Court to advocate for myself and I just didn't know who to go to because I didn't think it was fair.

Response: So, I tried to give the general answer, but I think it's helpful if we could have a conversation offline about the specifics of that particular situation because again, we want you to be able to advocate for yourself and we certainly don't want to take that away. We also want to just apply the rules of the program that we have to follow at the same time.

We can connect offline and also have just a deeper discussion about this rent reasonableness and payment standard topic.

Comment: My name is Sandy [Patalero]; President of the Mercantile Wharf Tenant's Association. And, I want – first, I want to heartily thank BHA for their – all of their help in helping us to stay in existing affordable

housing. It was a long battle and our tenants here – myself included – are very, very grateful. Thank you.

I just found out about RAB, so I would like to get a copy of the plan. Could you post in chat, could you post a link for the plan and the amendments and so forth that were mentioned at the beginning so that I can read them? I don't have that link so I haven't read that information.

And, could you also post a link to how one gets – how a tenant association would become more involved in RAB? Thank you.

Response: BHA staff posted a link to the annual plan in the chat. Sandy, I appreciate the sentiment in what you're saying. I will say that the plans are posted on our website. You had also asked about our Resident Advisory Board. That's a group that's been around for a number of years. It's elected residents that are part of Boston Housing Authority, whether it's in our elderly and disabled housing, our family housing, or our Section 8 leased housing. I'm happy to make sure that you get that information. They usually meet on a monthly basis, the second Thursday of the month in the evening at 6:00 PM. They've been very, very active throughout the year but always around the annual plan. Their phone number is

actually in the chat also as well as their email. And so even if you're not able to – just today – to connect with them, I'm sure that going forward, folks from the RAB will reach back out to you if you email them or phone them with your interest and you can have that conversation with them.

Comment: This is Mac McCreight. I just joined the call right now. Apologies. There was another meeting that held me up. I've shared with the BHA and RAB a number of thoughts about things. What I'd say is that the BHA plan looks pretty good this year and it's real compliments to everybody at the BHA for everything you've been doing to help residents weather what's been going on and to respond to the crisis that we're all in the midst of. I've given the BHA a number of written comments on different pieces of the plan and I hope to speak further on that this evening.

Response: Thank you, Mac, thank you for joining the call and just acknowledging that BHA has received your comments on the plans.

Comment: S: On pp. 83-85, in Section 23, is a discussion about Project Based Vouchers. BHA has revised the cap on PBVs to reflect an increased number of Section 8 vouchers. While BHA is projecting an increase in PBVs, at the end of

2021, it will still be well within the program cap. BHA also notes that, consistent with HOTMA, it can also develop PBV units that are replacement for public housing and are not subject to the cap, and that there are currently 788 RAD PBV units under contract that are exempt from the cap. BHA has also slightly revised the criteria for PBV placement to include preservation as well as new construction and rehabilitation.

Response: Thank you for the comment.

Comment: This is Karen of the Greater Metro Area. I'm a Section 8 tenant. I also on the Resident Advisory Board. I was wondering, where are the 55+ apartment buildings in my area? Because there are none. There are 55+ buildings elsewhere. The tenants don't pay for utilities, but can turn off the AC and heat of their unit. They're spacious. There should be more 50 and 55+ units near my building. One day, I hope to move back across the street to my community in Brookline. I wanted you to take note that, every time, when I thought I had to be moving, the families ruined it for me because they don't know how to behave, with the delinquent kids and the parents that have psychiatric problems. I want it to be noted that there are still drug and alcohol problems, an epidemic that has started before COVID,

and I really don't think that it's being addressed. There are the drug and alcohol police that don't address mental illness and I don't know why not. I think they should. I didn't know if other people know that doing drugs does cause mental illness.

I'm really not fond of these developers destroying Boston with overdevelopment and I don't know why... How come they can't do things a little bit differently? I mean, do they think that Bostonians like walking in a sea of people when they walk down the street? We, in Boston, have our own particular set of problems and good things and I don't think it's right that some of the so-called "experts" from other states, that get some kind of benefit from doing something for Boston, why their viewpoints should count as much or for anything. I mean, this is Boston. It's not your state, it's ours. In terms of some of the emails and different things and the people, I just, I didn't think it was awesome.

The other thing about the laundry: I was wondering, during COVID, laundry is very expensive and I'm not sure, between the COVID spread and the bed bug spread and the different things that happen to be around in cities lately, how often residents are supposed to be doing laundry. I don't feel that all assisted housing types are getting what they need, in

COVID, such as masks, hand sanitizer, maybe organizers. I really feel that these home services people, these agencies, they should be fired. They really shouldn't be in business, because they just try to get you to fill out these forms with some ridiculous questions and then they say anything to get that job. They promise things that they don't deliver or can't deliver. They're not great at cleaning your house when you're incapacitated to do so.

I was just also wondering the question of mental health. Do those people realize that these people would rather talk to a nurse, rather than the mental health professionals? I was also wondering if HUD realizes that not every building should be a family building. Most buildings in my area are two-bedrooms or larger and I don't think it's okay that three people can take a two-bedroom with this overcrowding, and the fact that drums and horns and other things...these behaviors. They're not given resource lists about what to do or how to behave when it comes to private buildings. I've had some issues with a new tenant in my building and I just think the Annual Plan is getting further and further away about what good tenants want.

As far as Section 8, I just wanted to thank you for the small area rents because, as we know, certain areas are

more desirable than others. I wanted to thank you for the small area rents, the small FMRs that vary by neighborhood. I wanted to thank you for my home because I do love my building, even if it is misplaced. I'm wanted more – I'm really losing all track of sense of time and dates and all that – time to appear, when it comes to Section 8 office visits. I'm being afraid that there might be some dilemma coming up, where I miss an appointment or something happens with the communication and everything. I wanted to talk more about the super priority with RAB and I wanted a meeting with aggregate data versus personally-identifiable data because men get distinguished and women old. I'm so sick and tired of having all my data out there, published on the internet, including my phone number, without my permission, so that's another thing.

Issues that need to be addressed: Homeless entering our homes, sleeping in our hallways (this includes my building upper floors) and many buildings. In addition to this some of these same people defecating in our hallways and even shooting up drugs with their needles! Many call this a life style choice instead of getting help why because they are in denial and as such giving them a place in our homes with not work and only endanger us! Most of these homeless are

usually drug addicted and young under 40 years old. In addition to this they collect all kinds of garbage including rotting food occupy a bigger and bigger area outside our homes on the sidewalks as they yell what are you looking at when you cannot catch your bus because the whole area is taken up by their carts full of garbage this is not only disgusting but unsanitary! Sanitation people cannot keep up with the amount of garbage that accumulates all up and down the sidewalks and in the bus platforms! Is it any wonder why people are moving out of the city?

Just because kids are sent here or left here the US. does not mean automatic residence when the parent returns or not! Residency lawful residency and Citizens first! Residency should be 5 years in the state of MA. Or at least the Greater Metro Area! I have been told by several people that cities belong to Illegals now so I should move! At this point I am feeling outnumbered by all the Chaos and craziness but I feel very uncomfortable driving!

Other agencies sometimes appear to come before residents of Housing Authority connection which should never be these are our homes and rights first and foremost! Most of these meeting are for discounted residents only and others are for the public. Annual plan is not for ANY agency at attend including DACA and I

demand to know who signed in under this name!

What is the \$200 contribution to our rent for working? Who is eligible? How long does it last? Is it different for people over 50 or 55 last longer?

Where are the 50 or 55 +buildings in my area Babcock St.? None are like mine but I need my community and home to be in the same place. I am from Brookline and I like that way a town is run even if it is in name only.

Pine St. Inn want to put sick people chronic drug abusers, schizophrenia and physiological problem people in our homes particularly Section 8 mobile Voucher Holder places NO! I can assure you that other good tenants and landlords do not want this! It matters because I makes me look like shit and it the rental market this matters!

While I am grateful for SFMR Small area rents as a good tenant I resent having to compete with other forms of mobile renal assistance even MVRP – which was not approved by RAB board!

Rental moving fees paid toward move no transit options to go farther I have none I have to take the transit with lots of other people during Covid possibly catching it!

The other thing was for the moving fees in section 8. Everyone else does get moving fees and it seems that

whenever something is valuable, it goes to public housing, but, yet, we get these crazy household services, which in my opinion, like I said earlier, should go out of business. We don't get moving fees, we don't get any assistance in washing clothes during COVID, we don't get masks, we don't get hand sanitizer, we don't get anything useful.

Thank you for my home I love my building Karen Stram That's basically it.

Response: Thank you very much for your comments.

Comment: Hi, my name is Robin Williams. I'm a Section 8 member. Also, I sit on the BHA Panel. My question is, when the inspectors go back to work, or if they already have someone at work, when are they going to start doing inspections to this house?

My second question is when will the BHA Annual Plan be ready? That's it.

Response: I can really quickly answer your question on inspections. That is that once COVID occurred, the BHA made a decision that it would, in accordance with some waivers granted by HUD, stop doing annual inspections in person. We would continue to do any kind of tenant complaints, we would follow up on those and we'd also do inspections at

initial move-in. We don't expect to start those annual inspections immediately in the new year. I think probably six months, potentially, after the new year starts, we will start doing some type of actual physical types of inspections. As far as the complaint inspections go, if there are issues, you can always call our Inspections Department and they will assess with you and with the owner what the nature of the issue is. Then what we do if it's deemed a non-life-threatening issue, meaning that there's no serious health and safety issue at the apartment, we would require the owner to self-certify the repairs and we would also have you, as the resident, confirm that the repairs were made that needed to be made. If it's an emergency situation or a health and safety issue that could be potentially life-threatening, we're going to go out to the unit, confirm it, and require the owner to repair within 24 hours.

As the BHA, we had changed our acting plan a couple years ago now. We are moving to biennial inspections, so that means we'd come out every other year for our regular inspections. So, in some ways, the fact that we have this pandemic has kind of helped us move to that biennial cycle which we were thinking about moving to anyway. You could always call in a complaint to your Leasing Officer or to the

Inspections Department if you feel there's an issue that needs to be resolved that the landlord has not resolved. Always good to try to get the landlord to make that repair first and, if they're not willing to do it, we certainly can be helpful in assisting.

To follow up on the other question that Robin raised which was, "When will the plan be ready?" Right now, we're still in this 45-day review and comment period, which runs through December 15. After December 15, BHA takes some time to consider all of the comments that have been made, if there are any changes that we need to make to our draft plan before we submit. There are a couple of different submission dates but, essentially, it will be in January 2021 when we'll be submitting our plan.

Comment: My hand was in response to what Ms. Shaheed had asked, in part, and it's also a little bit on what Robyn said.

The RAB actually will have a meeting, I think, the first Thursday in January, as opposed to the second, because we're then going to review what BHA has thought about internally. The RAB has a chance to look at what BHA's thinking of finally sending to HUD before it goes out, in case there was anything that was a problem with it. For the

members of the public that are using the BHA's website, BHA also then does this whole description where it's like, "Here are all the comments we got and here's how we're responding to that comment." That's available to HUD, but it's also available to any member of the public after this whole process is done. Everything that we've talked about tonight is going to be up there in some form or another, in that.

Response: Thank you for the comment. Staff will post the whole Plan submission on the website including written responses to comments.

Comment: (also RED) I was on a call the other day which included Barbara Sard, where a number of us were planning about comments that might be done by National Housing Law Project (NHLP) and the Center on Budget Policy & Priorities about HUD's latest HOTMA regs. My assumption is that CLPHA and others are also pulling together comments and there is likely shared interest on a number of areas. In the course of this conversation, Barbara said something to me that was surprising, and I realized that if it was true, I would need to add this as a comment on the FY 2021 PHA Plan and FY 2020 amendment before your deadline.

We were discussing the issue of tenant selection in PBV

developments, and the initial role by the PHA in screening, and then the owner's later screening. As several in this email loop know, we've had some concerns about, for example, the Beacon proposal at Lenox Street because of lack of clarity about how CoreLogic credit checks will be used and advocates elsewhere have been concerned about overbroad use of credit history or past housing history where it was really related to poverty (failure to pay rent on an apartment with a high rent in comparison to income would not predict failure to pay if rent were income based, for example). People on the call wanted to know if people who were rejected by owners were staying on PHA lists for other sites, and I said that was our experience in Boston. I said that if, on the other hand, the applicant passed both PHA and owner screening, and then rejected an offer, my understanding at least with BHA was that the applicant would be removed from all waiting lists. Barbara said this should not be how it happens under the PBV statute, and that this was DIFFERENT from public housing, where that would in fact be proper. That was news to me, but since Barbara was very much involved in the drafting of the PBV statute and its revisions over the years, thought I should look.

Here is the language I found in looking at 42 USC 1437f(o)(13)(J) this morning: "Any family that rejects an offer of project-based assistance under this paragraph or that is rejected for admission to a structure by the owner or manager of a structure assisted under this paragraph shall retain its place on the waiting list as if the offer had not been made."

Please note this as a PHA Plan and amendment comment submitted prior to the deadline, but also let me know what's most appropriate both for our RAB/PHA Plan discussions and all of the related contexts in which we're having these conversations. Thanks.

Response: Thank you very much for calling this to our attention. BHA would also like to acknowledge our appreciation for your assistance as we have been reviewing materials related the Lenox Street conversion; we certainly share the concern that credit checks be used judiciously.

Legal

Comment: Violence Against Women Act, Limited English Proficiency: BHA has not proposed any changes. GBLS has suggested that BHA may

want to take similar steps here to those that it's done for Reasonable Accommodation— i.e., where adverse action is being taken, and VAWA or LEP factors may be in play, provide for option for interactive process to explore this, and to not proceed with termination if flagged prior to effective date, etc.

Response: BHA staff will take the comment under advisement.

Comment: The next point has to do with policy around limited English proficiency and particularly [the] Violence Against Women Act. BHA has some really good policies on this. They also have a really good policy on reasonable accommodation, but we had noticed that in the Reasonable Accommodation Policy, one of the good things the BHA recognizes is that, sometimes, people don't come forward and articulate the stuff that's really going on until the very last minute. They don't know that they need to be articulating: "I'm having difficulty with this issue because of a disability that I have." The same thing can be true where someone is a victim of domestic violence or the same thing can happen where a person's had difficulty communicating because they have limited English proficiency. So, the thought would be: try to have the policies all lined up, in the sense that if someone

comes forward and it's kind of late, but it's not too late, still then say "Wait a minute. Let's not proceed with a termination then. Let's give them a chance to sort of show us what all is going on and hold off on that." BHA hadn't proposed any change in that area at all, but we just thought, as long as BHA is in this moment, that it looks at policies, and this might be a worthwhile thing to look at.

Response: BHA staff will take the comment under advisement.

Comment: I have a small question. It says here, "VAWA Relief" and I was wondering what that means. I forgot. "VAWA Relief, PP10, 11..." I was wondering why revise the strictness of the Violence Against Women Act?

It says, "BHA wants to revisit the strictness of the 14-day period and loss of protection."

Response: The BHA is not proposing any changes to the Violence Against Women Act policy for the BHA.

Operations

Comment: (also Lsd Hsg) S: On p. 27, Section 4.A.(1)f, see separate comments on the ACOP changes. While some of the interim changes here are welcome, and make permanent some positive changes BHA did

in conjunction with COVID-19 waivers in the spring, the interim reporting threshold of 10% on unearned income is not one that GBLS favors, and we similarly comments to HUD on this with its proposed HOTMA change in 2019 (and HUD has not yet issued a final rule). We think it would be wiser to use the \$200/month threshold given greater equity in treatment of families with lower incomes.

Response: This change to the interim reporting threshold on unearned income was added to public housing ACOP to be consistent with Leased Housing policy in the Administrative Plan. Also, the change to reporting on unearned income is different than the reporting of a household if income goes up \$200 or more.

Comment: S: On pp. 31-32, Section 5.A. is revised to reflect that a number of Brighton public housing developments that were previously managed by Corcoran Mgt. (Commonwealth, 91-95 Washington St., J.J. Carroll, and Patricia White) have become BHA managed as of the spring of 2020. However, the chart fails to note that all Old Colony/Anne M. Lynch Homes are now privately managed (rather than being split between BHA and Beacon Residential).—this should be corrected.

Response: Staff have updated the template. Thank you.

Comment: S: On pp. 33-34, Section 5.B, there are revisions in the number of families served. However, there is no good explanation given as to why the number of public housing families served has dropped by nearly 1,000, but the Section 8 numbers have only gone up about 200. One would expect some congruence between these numbers as BHA switched from the public housing to the Section 8 program at a number of sites. Similarly, there seem to be reductions in the number of Mod Rehab and Mainstream Units, an increase in PBV units, and a new non-elderly disabled voucher category. It may be that this ends up with a zero sum (or a gain), but there should be an explanation of all of this, since residents, applicants, and the public would be very concerned about a net loss of housing opportunities at the BHA for low-income families.

Response: Thank you for the comment. The table lists federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year.

Comment: S: On pp. 44-46, in Section 8.B, BHA has revised what programs it anticipates will be offered to residents and participants. I believe some programs are new, such as the BPS Homeless Student

program, but the chart doesn't reflect this; other times, there may be alterations in program descriptions or expected enrollments, or certain programs end (such as the SAMHSA set-aside). The Summer House program at Malone is added, and the Jobs Plus Pilot at Charlestown is eliminated. BHA also notes that, possibly due to COVID-19, ROSS start-up time began a few months later than anticipated with an initial 3-month gap. BHA may also want to add to the list the ISHI Tenant Empowerment collaboration with GBLS and City Life/Vida Urbana. On p. 46, it appears that the Family Self-Sufficiency (FSS) program is anticipated to add almost an additional 100 Section 8 households this year.

Response: Thank you for the comment. BHA staff have updated the information in the table. Some programs have been added and others have been removed if they are no longer active.

Comment: S: On pp. 60, Section 10, there is a revised to make the treatment of assistance or service animals consistent with HUD regulations as well as BHA's Reasonable Accommodation Policy. It should also be noted that a current issue being discussed among BHA and advocates is how to carry the protections of federal public housing pet policy

into mixed finance repositioning on a Section 8 platform, and not merely to "grandparent" in existing pets for residents who switch to the new platform, but also to have similar rights as pets turnover, as well as for families newly admitted to such housing. This is one of the issues being discussed in additional Mixed Finance management protocols to be used during such conversions.

Response: Thank you for your comment. This is part of ongoing BHA and partner discussions.

Comment: S: On p. 79, Section 18, BHA has statistics on the voluntary conversion of public housing to Section 8, comparing the costs of operating public housing to the costs of operating Section 8. However, this portion of the PHA Plan has not been revised, and it should be. It still uses Per Unit Month (PUM) figures from Sept. 2019, rather than current figures. BHA should update this.

Response: Staff have updated the table. Thank you.

Comment: S: On pp. 81-82, Section 22, BHA includes its no-smoking policy. However, there were two small but key changes made in the policy because of HUD regulations that took effect in 2017 which are not included here: (a) smoking includes hookahs; and

(b) there was a change in the required distance that smoking might be permitted away from buildings (perimeter limits). BHA should incorporate those changes here. A further question is whether, in mixed finance properties, the owner could chose to exclude smoking on all grounds, or only for those grounds/common areas that were within the barred perimeter from the building, and what steps the owner would be required to take to adopt a no smoking policy that was more restrictive than the BHA's property. This issue has arisen in the Mixed Finance Management protocols and as with other types of lease and house rule issues, BHA should make sure that such owners give affected residents notice and a reasonable opportunity to comment on any changes in policies/leases.

Response: No change to the Non-Smoking policy is required at this time. Some mixed finance partners have already taken steps so that their buildings are non-smoking.

Comment: S: On p. 88, there is a revised BHA organizational chart. One error appears—Caesar Cardozo is General Counsel (not deputy general counsel). Several people have moved to new responsibilities—for example, David Gleich is now responsibility for both Leased Housing and Admissions, Nancy Otero is the

new director of admissions, and Gloria Meneses is a new director for compliance in public housing operations. One thing missing from the prior BHA Organizational Chart is the Executive Committee—i.e., designating which department heads, etc., would meet regularly to make major BHA decisions. If this structure has been maintained in some way, the chart should be revised so that it is clear who is comprised within this grouping.

Response: The Organization Chart has been updated. Thank you.

Comment: AP: Note that BHA is a standard PHA, and that its federal program includes, 9,806 public housing units and 15,107 Section 8 vouchers, for a combined total of 24,913. According to the Template, BHA has revised its Statement of Housing Needs and Strategy for Addressing Needs, its Policies Governing Eligibility and Tenant Selection, its Rent Determination, Operations and Management, Community Service & Self-Sufficiency Policies, Safety and Crime Prevention, Pet Policy, but has not revised other elements (such as Asset Management, Financial Resources, or Grievance Procedure). BHA also refers to the Limited English Proficiency 4-Factor Analysis, Site-Based Waiting List characteristics, and RAD attachment; the 4-Factor

analysis is not included in the packet that was sent to the RAB.

The Template also indicates that BHA intends to undertake new activities in FY 2021 on HOPE VI/Choice Neighborhoods, Mixed Finance Development, Demolition/Disposition, Designated Housing, and Conversion of Public Housing to Tenant-Based Assistance, Project-Based Vouchers, and Other Capital Grant Programs.

Response: The Annual Plan template has been updated and the RAB was provided a copy of the 4-Factor Analysis.

Comment: I sent a message in the chat about the dates that were mentioned by Miss Gail. I just wanted to make sure that I was under the right understanding that, because I missed it, because it was going kind of fast, you were going to send those dates or email those dates? I wasn't clear. When did the 45 days begin? Is there a way for recipients of BHA to know when this timeline begins, so that they could kind of sit before the clock that's kind of at the end?

Response: The annual plan goes out for review and comment for 45 days. This public hearing tonight on December 7, people can give their comments on the Annual Plan, but we'll continue to

accept comments on the plan up through December 15, so people still have a few more days. Right now, tonight, we're taking comments on the Annual Plan, and then we'll take comments for the next week, up through December 15. The comment period began November 1st.

We've been meeting with the Resident Advisory Board for several months, talking about the Annual Plan and the drafts. Then we do a public notice in the newspaper on November 1st. We share copies of the Annual Plan with the local tenant organizations, we put a copy on our website, and we have a hard copy also at the Boston Public Library. We send a notice out with our rent statement to all the public housing residents. We send another mailing out to all of the leased housing participants. We're doing our best to try to let people know about this opportunity.

Comment: Okay. Maybe we can talk later about that because I've never gotten any notice about this plan and it was in the works and what people were planning on doing. I've never heard about anything until now for this public hearing. With the 15th being the deadline, there are not many more days for me to prepare myself, if I wanted to present something. Let me get to what I wanted to talk about and

present here, and then I can maybe talk to you later about what avenue or what method of communication I'm missing, that I'm not getting the documentation, because I haven't gotten any of that, ever.

John Kane/BHA: Certainly. If you could keep your comment to three minutes, thanks.

Hafeeza Shaheed: Wow, three minutes and it's my first time. My first comment is I hope there's another avenue or platform for tenants of BHA to talk to you all because I've been waiting and wanting to. Three minutes, once a year, is not long enough. I don't want to sound like I'm talking fast, because that's what I feel like I'm going to have to start doing to get all my points in.

John Kane/BHA: We are pretty flexible. There's not that many people that are signed in, but we are trying to run the public hearing. This is your chance to speak. It's a guideline, so we're going to be a little flexible with you. You don't have to rush. Take your time. Get your comment out. Thank you.

Hafeeza Shaheed: Thank you so much. Piggybacking off of the word "flexible," as we know, we are in the pandemic right now and the expenses for low-income community homes are steadily increasing. Our children, we are feeding them

breakfast and lunch at home now versus them getting it in school. Uniforms are not worn every day, we are actually putting clothes on them every day, and now we're having to have extra expenses to do laundry. I can go on and on in the expenses that the pandemic has caused us. There is no program in place to assist us with those who currently do still have a job to decrease some of the rent that they now have to pay because their expenses have increased because of the pandemic.

So, I'm asking if this Plan 2020 or the next Plan 2021 can address that. If it cannot address that, perhaps we can think about the contract jobs that are specifically aimed towards the COVID response. Those working on the phones with, say, Partners Healthcare, directly as a contract job for COVID, reaching residents of Massachusetts who are indeed positive with COVID. That contract is just until March. Perhaps those jobs and jobs like that can be exempt from having to report to caseworkers to help with the expenses and the steady increase that BHA residents are now facing. I want to make sure that point is understood, so when I get feedback on it, it's not about something else. Do you understand what I'm saying about that?

My second point is the timespan that caseworkers are given to say hostile, bad – that they will go in the recipient's case to find out if they were working or not and didn't report it. For example, I had a COVID contract job for 30 days. I have many friends who live in Framingham, South Middlesex, on Council House Agency. Their contract jobs that they have through COVID, they don't have to report. I thought it was the same here with BHA. Thirty days with me on the job, I left and then it was time for me to recertify. I was told that I was working and didn't report it. I showed them that this was strictly a COVID-19 job and I showed them how other Housing Agencies, not here in Massachusetts – well it is in Massachusetts, but not in Boston; it's in Framingham, even in Natick. Their clients don't have to report the COVID-19-specific jobs that they are hired for. I thought, because I was in Housing, too, it was the same. I was told it was not and I was told I had to pay that money back. In the midst of that, they told me, eight years ago, I was working for three months and, unless I could prove that I showed them that I worked for three months eight years ago, they were going to put me up for fraud and I'm going to have to pay that back, too.

So, I'm trying to find out if there's a guideline because it's

hard for me to go back to my shelter, eight years ago to the caseworker, for her to go into my case to show that she and I were working together and we notified everyone of what I was doing. I was in the shelter at that time, so I'm trying to find out is there a guideline of how far back a caseworker can go to make a client have to prove that they were working, because if you go too far back, you just can't prove it.

I know you can't answer that, but that's another one of my problems and I think that we can somehow address in the 2020 plan or the 2021 plan because, once again, we're [inaudible 0:28:07] becoming lower middle income. To constantly be taxing us when increases are increasing during the pandemic and then the issue – the regulations are brought about and making clients go back seven or eight years is compounding the problem of supposedly helping low-income communities and families.

Gail Livingston/BHA: I was just going to say, Miss Shaheed, I don't know if there's a way for you to send me some contact information. I'll put my contact information in the chat, and you can email me or call me, and we can talk more specifically about your case and I can look into your individual case as well.

Hafeeza Shaheed: I thank you so much. I just want everyone to know that I sit here with about 45 people on my back, who are going through the same thing, so I know you're helping me personally, but if that information you give me, I could pass it onto them, because this is becoming a huge issue. Especially since the pandemic hit, it's as if the caseworkers have gone in debt and I'm not the only one that they're having five and six years to go back to prove. I just thank you so much for that comment and I'll put it in the message bar for you.

I just want to get to this other point because I have a lot going on with kids sitting here. My last thing is the RAB policy that was mentioned. March, when COVID hit, I lost my job and I applied for the COVID right when they sent out the grant, saying that we had money here for COVID and we can bypass certain steps that had to be taken before to get RAB; "because of COVID, we're going to bypass those and please apply." I applied in March for the COVID for my water and sewer because it ended up being too much for me to pay because I lost my job. Long story short, from March all the way until September, I called and I called and I kept hearing I'd get a call back. I'm a BHA client. I heard the RAB representative on the phone saying she's from RAB.

I called, I emailed, I did everything. I even went down to Roxbury Crossing from March all the way until September. I live in affordable housing luxury in Seaport. So, if you're behind anything one month, they're ready to evict you and that's what happened to me. They sent me an eviction in October for the water and sewer when I was waiting on RAFT. RAFT kept saying, "We'll call you back." and they never did.

Long story short, I had to end up borrowing money from family and friends to take care of the water and sewer so that I wouldn't be evicted like the rest of my friends, the rest of my tenants. They are evicted.

My points are RAFT, my points are how far back can a caseworker go on a client's file, and my point is because it's COVID right now, a pandemic, and families' expenses are being increased in the home, can our income and what we report, can that coincide with what we have to pay for rent? Can we claim more expenses, because that's what we are going through? Can we claim that now and can that reflect how much we pay for rent? If not, could at least the COVID-19 contract jobs that we get – can that right there be exempt for us from paying rent? Those are my three issues and I pray that you all do get back to me because I've been at this since

last year. Since last year, with my caseworker and supervisors, and I have gotten nowhere. So, I thank you all for this opportunity and this time and space.

Response: BHA staff took down the commenter's information and provided their contact information to follow-up with the commenter.

Comment: I'm Mac McCreight. I'm from Greater Boston Legal Services and I work as a technical advisor for the RAB, but of course we also are always submitting comments to the BHA on a variety of different policies and we've done so on this as well. I just wanted to acknowledge this is the 21st set of public hearings around the PHA plan. The first RAB and first PHA plan hearings were held in the Fall of 1999. BHA has had a very good history of following through on this and always being very transparent with its approach. Obviously, this is the first time we've had to do one of these on Zoom and not in person and that poses some challenges to everybody concerned and I want to just take a moment to thank the BHA and thank the residents of the BHA for how everyone has been dealing with these unprecedented circumstances that we're all in right now. Obviously, there are some extremely unfortunate things that have happened. We have lost members of the resident

community, both in Public Housing and in Section 8. Some real resident leaders. We've lost people in the larger community, but people have been really resilient in trying to deal with this and roll with it as best we can.

Response: Thank you for the comment.

Comment: Thank you. Let me start by thanking you for giving me the opportunity to speak.

This might be a little bit different from what everyone else is talking about, but it has to do with COVID and cleanliness in our development, and things of that nature. Basically, my concern is; what is the BHA doing about improvements in COVID cleaning? I mean, do they have a protocol set in place for COVID cleaning? That's one of my first comments. Is there a protocol for COVID cleaning? Not just the general cleaning; I don't mean just general cleaning like mopping floors and things of that nature. I'm talking about wiping down the elevator buttons and the glass on the laundry room doors, removing all the smears, just general COVID cleansing, emptying the trash out daily, and things of that nature.

Before I go on, I want to thank Lueteshia for getting back to me about what days they are doing general cleaning in my building. I've been told that they do

cleaning on the weekends, but nobody comes here. Sometimes, when I talk to my manager and the other property management people, I feel like I'm being ignored. The first thing that they say to me is, "I was told that your building was clean." I say, "Can you take a walk over and see for yourself?" "Well, we don't have time," or, "I'll get to it later. I have an emergency," is something that I heard recently from Christine, I believe, the maintenance supervisor. I used to walk down my stairs a lot of times just to get some exercise, as opposed to getting in the elevator. I can't walk down my stairs anymore. Not just because it's not COVID-clean, but because it's just not clean, period. I'm not going to say, but it's really gross things that people are stepping over; well I'm just going to say it: feces. That should not be. If you came here on the weekend, I should not be stepping over urine and feces. I'm still seeing those things. The residents say to me, "Who did you tell? We told you that we would back you up. Who are telling these things to?" I say, "I'm talking to the right people, but you all have to keep talking as well." That's just some of the things that residents concern about COVID, not just general cleaning, but the COVID cleaning.

We had signs. The other thing I was wondering regarding improvements in COVID

cleaning: what about the signage? We had signage up on our doors and in our elevators about trying to keep people six feet apart. Those signs have been removed. They were never put back. I don't know why they were taken out of the building, but they were taken away and I would like for them to put them back so that people don't crowd into elevators. We do practice social distancing, but when you take them out the elevator, people forget and they tend to crowd.

There's another issue, because of the number of homeless people there are now – not just homeless people, but we just have a lot of traffic in our building. Our elevator is constantly broken now. We have a resident that got stuck in there not long ago and, lo and behold, I got stuck. Two weeks later, I was stuck. The elevators were so bad that I couldn't even call to get help because the button you press to call for help didn't work. The lights went out. Everything went out in the elevator. I had no way of contacting the outside, I'm stuck in the elevator for almost 15 minutes with no way of contacting the outside. Luckily, I had my cell phone; I called 9-1-1. The Fire Department came to get me out, but right before they came to get me out, the door slowly inched down and it did open. It's things like that, that the

residents go through every day, that shouldn't have to be.

The back stairwell, there's no lighting. We need good lighting so that we'll know where we're walking into. Because we have a lot of people who come in that don't live there, we need good lighting back there, so we'll know what we're walking - when we're trying to get out of the building when we're walking down the stairs, we need good lighting in the building. The lighting is not good anymore.

Response: Our Director of Operations, George McGrath, is on the call. I know he's listening to all of this and I think that you have informed me of some issues in the past and I have discussed them with site management and with Mr. McGrath. We need to set up something; unfortunately, we can't have a tenant meeting out there.

We do have COVID cleaning protocols in place. We definitely should get that signage back up if it's not there now and we know we can put those things in place right now.

After the public hearing BHA staff communicated with the commenter and staff walked the site and held a virtual site meeting with residents to discuss these issues. Covid-19 protocols have been reinforced with staff here and across the portfolio. Signage on social

distancing has been replaced. At least one significant repair on the elevators has also taken place.

Comment: Lastly, I don't know if I've mentioned this about the elevator, but the elevator doesn't just stop, it never evens out, which is why people get stuck: if the door won't open because it's never level. So that's why we get stuck in our elevator so often. The door goes down so slowly, you can tell it's struggling. It's almost a frightening thing just to get on there. It moves down so slowly, and you know the door is not going to open because it's not level at all. So, you're sitting in there waiting for someone to come and get you out and there's no lighting in there. Luckily, they finally fixed that issue, but now when I got on it tonight, it jolted me. I don't know when it's going to go out again. It's not just in my building; we have 2, 4, 6, 8. Their elevators are always broken. It's horrible. They have tons of wheelchair patients. I have wheelchair patients in my building as well. I talked to Joey about it. He says he's looking into getting – I don't know if he said new elevators or something to that effect – but every single day, along with the COVID problems, we have elevator issues.

We found people in our hallway that we have to ask to leave.

We do dial 9-1-1, of course we do, but these trespassers are not leaving when we ask them to leave anymore. They don't leave. So, yes, we do call 9-1-1. It's best not to speak to them, we realize that. If they're kids and we know that they're from the building, we'll ask them to leave in a polite way, of course, but a lot of times, they're not kids. These are stragglers from outside. I don't know if they're homeless or what, but they're coming in and sleeping.

I've addressed all these issues. The residents are really getting terrified of what they're going to find when they go down those stairs or whether or not they're even safe. Before I forget, safety is another issue. Recently, a resident sent me an email that they found three men shot on Jette Court who had gunshot wounds. She wanted to know and asked me, "What's going on around here?" I said, "I don't know. This is my first time hearing about this." Like I said, we have people in our property, in our buildings. There's so much going on with COVID, we can't lock our back doors, the building's not being cleaned, so they just help themselves.

The doors are open all the time. That's another problem, Gail. We can't get them to close that back rear door. They leave it open all the time because they say that the Fire Department

said that it was a fire hazard and it has to stay open all the time. Well, it's open all the time, Gail, but you're inviting loiterers to come in. Because that door is open all the time, they're inviting loiterers in and loiterers are coming in through the building, whereas you're blaming the residents here, the residents are letting them in. No, not so. Residents are not letting them come in. They're coming in through the outside, a side door. The Police Department knows about it, everybody knows about it, but they still come in. I had a conversation with Joey about that. He said he would ask someone to make sure that door is closed and locked before they leave in the evening. I don't see them either, because when I come home, I go down there and look and the door is open and I can hear people down there. I don't go down there, I just go upstairs and I call 9-1-1. That door is left open.

Response: See previous response. It would be productive if we sat with you and went through all of these and came up with some solutions, in a group with management and George and I. We can figure out how to do that.

Betty Rae Wade: I would love to do that. Thank you. I don't mean to sound overwhelmed.

Gail Livingston/BHA: No, not at all, Betty. I understand that there's a lot of stuff and you face it and your neighbors face it every day and I appreciate you bringing it up. So, let's figure out a productive method for us to all sit down and try and work out some solutions and see what we can do. George and I will be in touch with you in a couple of days.

Betty Raye Wade: Thank you. I would appreciate it. Thanks, George. Thanks, Gail.

Comment: I will be brief. I had two comments; they're very important. In accordance to the Governor's mandates, a lot of the residents are complaining that the contractors that are on site here in Corcoran, they're coming into their homes unmasked and they're not happy about it. When they speak on it, the contractors say, "We're not Corcoran." That has nothing to do with Corcoran. This is a mandate set by the Governor. Our residents want to be safe. They're upset that the workers, these contractors, are coming into their homes unmasked and they're smoking.

That should not be happening, exactly. I know it might not be a law; it's a mandate, but it's still supposed to protect the residents as well as them. It's becoming a big issue.

One other thing, they're smoking on the property. If you

work for BHA, you know not to smoke on the property, but a lot of that's happening as well.

The biggest issue is that residents are fearful of opening their doors now because the workers are not wearing masks in their home. There are times when they have to go in because of emergencies, so they let them in anyway and they just go outside. One of the residents says she left her apartment just so they could go in and fix whatever the issue was, because she needed it fixed, and he didn't have a mask. He said he left it in the truck or something. Just at my last meeting, I heard three other complaints about contractors going into residents' homes. It's not a law. It's a mandate, but it's a health hazard to our residents when they do that, because a lot of them are elderly and they have health issues. They want to be safe. I just want maybe the BHA to speak on that or address that issue with the contractors or anyone that comes into your home to do any kind of repairs.

Response: See previous response. Staff and contractors should not be in buildings or resident units without their mask and also they should not be smoking. That is against BHA policy.

This is Randi Holland. Betty, I'm the director of Capital Construction and we do have

one project with a contractor at Commonwealth. They're doing door replacement, mostly in the townhouse buildings. I will speak directly to our project management staff that are working there, with this contractor to make sure that they do understand – and they do. I know they do understand the requirements for wearing masks there, so I am a little concerned hearing this, that they're all coming into residential units without a mask on. We'll take care of that directly tomorrow.

Betty Rae Wade: Well, I didn't say "all," but I'm starting to hear more and more complaints about them coming. More and more. In fact, one of the residents is on our task force. It happened in her home. It is happening.

Gail Livingston/BHA: We'll make sure to remind our own staff and Randi will make sure that we are in touch with our contractors who are doing work on the property, but everyone who goes into anybody's unit should be masked. There's no question about that.

Comment: What is the purpose of the meeting? Did the meeting start at 7? How can I access the plan documents?

Response: We did talk a little bit about this at the beginning, but the Housing Authority is required to do an Annual Plan. We do a plan and we put it out

for review and comment for a period of time. The idea is that people take a look at the plan and they might want to say, “This is part of the plan I support,” or, “Here’s a part of the plan I don’t support,” or, “a part of the plan that could be improved. This is an opportunity for people to ask questions. If you’ve been on the call for a few minutes, you can hear different residents bringing up issues with programs or asking questions, so that’s really the purpose of this meeting. The meeting started at 6 pm.

There are a number of ways to access the plan itself. It’s on the BHA website, which is BostonHousing.org. That’s probably the easiest thing to do. There’s a copy at the Copley branch of the library. We also send copies out to the Resident Advisory Board and to LTOs, but probably the best way is to go to our website and the Annual Plan is there. Staff posted a link to the Plan in the chat function and staff also emailed the commenter a link to the plan documents on the BHA website.

Comment: I had a quick question. The results or minutes or the proceedings of this meeting, is that going to be found on this whole website method. I mean, where can we find it? It’s just that the method that is presently available for the recipients to get information

is kind of hard. I mean, I know caseworkers can’t email us everything, but if this happens once a year, maybe they could email us, because it would be so much easier. For Ms. Shea, even myself, I had a problem with registering today. I appreciate Mr. John Kane personally assisting and sending a link to my email. I just got a phone myself about four months ago, so that would have been impossible for me.

I appreciate everything, I do. I don’t want to sound like, “Oh my goodness, you people are doing nothing.” No, you all are doing great, but it’s just that there are certain little things that are not allowing us to get the full benefit of the reward that you all are trying to give us. Certain things like getting us that communication, John Kane mentioned all these sites earlier where the plan is at, but I don’t hear him, I don’t know what he’s talking about; I never heard of that. I don’t know how to get there. I did click on the link. I tried to read through it. That’s even confusing. It’s not for the layman person. It’s not for us. It’s not for us. Maybe sometimes you need someone like us, a resident on the board so you can have someone to speak our language, because it’s just not on our level, unfortunately. It’s difficult and it’s for us.

Response: The Annual Plan itself is a complicated document

and we do make it available, but I understand the difficulties and that’s why we try to have the Resident Advisory Board meetings et cetera. We’re learning, so I really like to hear your feedback. As Mac said earlier, this is our first virtual hearing. It makes things a little more difficult. It’s harder for us to communicate and actually talk to each other. In years past, we’ve all been in the same room and I could individually speak to people and get information and we could move ahead. This is a little more difficult, but we really appreciate your feedback – hopefully we don’t have to do this too many more times – and also, ways to make the Annual Plan itself more accessible, or at least the changes that the BHA is making accessible, so I appreciate that.

The Plan can be a difficult document to be able to access and process. There was this question earlier around our Resident Advisory Board. That is a group of residents who meet every month for a few hours. We have been presenting and talking about our plan for hours and answering questions. That’s something to think about and I know there’s more information in the link about the RAB. If you have that interest, we really welcome that interest. There are places where we can spend more time and unpack these documents which can be a little difficult to understand.

Public Safety

Comment: (also Legal) S: On pp. 48-50, Section 9, Safety & Crime Prevention, BHA has added a provision for BHA police to carry and administer Narcan while on duty. This can be key in saving the lives of those suffering from overdoses.

Response: Thank you for the comment.

RAD attachment

Comment: (all RED this section) On p. 1, BHA has revised this to make clear that the property owner is also obligated to comply with the various RAD attachments (in addition to BHA).

Response: Yes, that's right. A RAD conversion may (in some cases) involve a new, non-BHA owner. This change simply clarifies that the obligations to comply with RAD requirements apply to the BHA and any other owner, as applicably.

Comment: Note that pp. 3-5 and 13 were deleted for Lenox Street, St. Botolph Street, Bunte

Apartments, and J. J. Carroll. That's because it was initially thought last year that there might be done as RAD conversions—and BHA has decided to pursue them as Section 18 conversions.

However, from what's in the body of the FY 2021 PHA Plan Supplement, it appears that BHA had not yet obtained HUD approval for the demolition/disposition application for Bunte Apartments (p. 5)—so it may be premature to remove it from the RAD list until it is clear what HUD has done.

Response: HUD did recently approve BHA's application for a Section 18 disposition of Doris Bunte. That occurred on November 30, 2020. With that approval secured, BHA does now plan to pursue the Section 18 disposition instead of a RAD conversion.

Comment: On p. 6, cannot recall if Ausonia was on last year's list. While BHA reserved the possibility of a RAD conversion with a CHAP date from Feb. 2018, as noted in Section 16 of the Supplement, this may turn out to be a Section 18 conversion which would be submitted in 2021—so stay tuned.

Response: BHA intends to keep both options open (as HUD allows). Approval of a Section 18 disposition will depend on the level of capital needs at

Ausonia. BHA does believe that capital needs at the site are high enough that a Section 18 disposition is warranted, but a formal application to HUD has not been made yet.

Comment: On p. 7, this refers to some RAD PBV units which would be part of the Anne M. Lynch Homes Phase 3A redevelopment at Old Colony. The only revision here is to make clear that these are PBV units (rather than PBRA).

Response: Yes, that's right: this is merely to provide the additional detail that these are PBV units, rather than PBRA units.

Comment: On p. 8, Long Glen, this makes clear that these are PBRA units (rather than PBV).

Response: Yes, that's right.

Comment: On p. 9, Heritage, this is a conversion of the remaining small number of public housing units at the site to PBV, but also makes clear that only 28 of 31 remaining units are converting. (Two of the 3 units left are for employees, and one is an 'agency' unit for use of the LTO or programs.)

Response: Yes, that's right. The non-residential units cannot convert.

Comment: On p. 10, Lower Mills, this is also a conversion

of the remaining small number of public housing units at the site to PBV, but makes clear that only 17 or 19 remaining units are converting. (One of the 2 units left is for an employee and the other is an “agency” unit.)

Response: Yes, again, non-residential units cannot convert.

Comment: On p. 11, Mission Main Phases I, II, and III, all of the units (which were developed through HOPE VI in the 1990’s) are expected to be converted to RAD PBV by 2021.

Response: Yes, the conversion at Mission Main is still on track to convert in 2021.

Comment: On p. 12, Eva White, this is a 75% RAD, 25% Section 8 conversion “blend”—the only change here is that the closing date is moved to 2021.

Response: That’s right. Eva White has not yet secured state funding, which is needed to support a conversion. BHA and our procured developer partners, Winn Development and Castle Square Tenants Organization plan to apply for state funding in January 2021.

Comment: On p.14, Patricia White, as proposed this is a 75% RAD/25% Section 8 conversion. The summary here of the Section 18 conversion alternative should be revised—

BHA is no longer pursuing it as “obsolescence” due to high costs, but for other reasons. BHA is awaiting a response from HUD on its demolition/disposition proposal (see Section 16 of the Supplement), and this should be revised to reflect whatever final action is taken by HUD. BHA had, in Sept. 2020, told the RAB that it thought there might be a closing here in 2020, but it appears the date is moved to 2021.

Response: HUD approved a Section 18 conversion for Patricia White in November 2020, and the conversion occurred at the very end of the year. BHA will now update the RAD attachment to remove Patricia White.

Comment: Somewhere in the document, it may make sense to also refer to the Mixed Finance Tenant Participation MOA and Mixed Finance Grievance Procedure, which are designed to insure that residents in these properties also get the rights in the RAD attachments. BHA is also extending certain of those protections to Section 18 developments which otherwise are not subject to RAD protections with regard to tenant participation and grievance procedures, and that BHA is continuing to work on establishing other Mixed Finance Management protocols governing the form of lease,

interaction between BHA staff and owners on recertification/rent adjustment issues, and admission and transfer policy.

Response: These points are absolutely correct. The RAD attachment follows the format of a template provided by HUD, and it may not be appropriate to alter that format; nevertheless, the BHA does commit to implementing the tools mentioned here at each of our RAD conversions, as well as in the context of non-RAD conversions and redevelopment efforts.

Real Estate Development

Comment: S: On p. 65, Section 14, language about Whittier Street and Choice Neighborhoods was deleted from this section.

Response: BHA deleted the reference to Whittier, because that Choice Neighborhoods grant was already awarded (in 2016). This section is more specifically asking about future grants BHA may plan to pursue; and since BHA is still in the process of implementing the Whittier grant, there are no

current plans to pursue a future grant.

Comment: S: On p. 66, Section 15, BHA has stricken RAD conversion as possible options for St. Botolph. Bunte Apartments, J.J. Carroll, and Lenox Street, since HUD has authorized Section 8 conversions at these sites. I believe the same is true for Patricia White, but it may be that BHA is still waiting for a HUD response on that site.

Response: Yes, that's right, BHA had been waiting on a response from HU; however, HUD ultimately did approve a Section 8 conversion at Patricia White, and that conversion occurred at the very end of 2020. BHA will update the plan supplement accordingly.

Comment: S: On pp. 67-75, Section 16, BHA has made a number of revisions to its demolition/disposition summary, as follows:

A projected date for Phase 4 at Old Colony of 2022 is given, but the section should also include a description of Phase 4 (and not just Phase 3)

Response: Response: The details provided for both phase 3 and phase 4 are specifically related to demolition activity. The template does not provide a place to indicate the plans for redevelopment. The plans are, however, to replace the 250

original units demolished in phase 3 with 305 new units (currently in construction) and to replace the 208 units to be demolished in phase 4 with no fewer than 208 new units.

Comment: —p. 67; Charlestown gives a projected date of demolition for Phase One in 2021, with future demolition/disposition to occur in phases (although HUD gave approval for an overall demolition/disposition plan)

Response: Yes, that's right. BHA will update HUD as development proceeds on a phase-by-phase basis. Informal updates will occur by letter correspondence, and formal updates (upon each disposition action) will be recorded in HUD's PIC database system.

Comment: —p. 69; Amory is revised to reflect the disposition of the first parcel of vacant land in Sept. 2020, with construction underway, and with future disposition expected in 2021-22 and construction completion on all the land by 2024

—p. 70; There is an expected 2021 application for a portion of Hailey Apts. (no date set yet), and with future physical needs assessments to determine whether additional pieces of the site may go through the process

-p. 71; An application for McCormack is anticipated in

2020 or 2021, but plans are preliminary

—pp. 71-72. There is an anticipated application for either RAD or Section 18 disposition for Eva White for 2021

-p. 72; Lenox Street's application was approved, and BHA has submitted an application for tenant protection vouchers to support renovation work

—pp. 72-73. J. J. Carroll's application was approved, and BHA says that it will be seeking tenant protection vouchers to support the needed redevelopment

-p. 73. At Patricia White, this indicates that the demo/dispo application went to HUD in August, 2020. If, as expected, this application is approved prior to finalizing the FY 2021 PHA Plan, both this section and the prior section should be revised (since, with the approval, RAD would no longer be the planned method for redevelopment); it should also be noted that the Section 18 proposal here is not based on obsolescence, but on other factors

-p. 74. St. Botolph has an approved demo/dispo proposal and the language here provides that all of the tenant protection vouchers will be project based-

p. 74; For Bunte Apts., has the demo/dispo application been

approved? If, as expected, this occurs before the FY 2021 PHA Plan is finalized, this should be updated, and reference to RAD as an alternative should be removed

-p. 75. For Ausonia, BHA leaves open the possibility that this may either be a RAD or Section 18 conversion proposal but that it will not be going to HUD until 2021-p.75.

Response: With respect to these comments regarding pp 69 to 75, BHA can report updates in connection with Patricia White and Doris Bunte. In each case, HUD has recently approved the Section 18 disposition; and, just as the commentator states, Section 18 application for Patricia White was not made on the basis of obsolescence but rather other factors. With both Patricia White and Doris Bunte, BHA is opting to pursue a full Section 8 conversion (pursuant to the Section 18 approval) without any RAD component. BHA will update those details of the supplement before submitting the final document to HUD.

Comment: S: On p. 87, in Section 25, there is a discussion of other capital grant spending. Most of this is to cover how transitional capital funding, lost as of a result of demolition/disposition of public housing, will be spent. BHA has included this information for FY 2012 through FY 2017 and has

shown that the funding is now fully expended in conjunction with Old Colony Phase 3 redevelopment.

Response: Yes, that's right. In past years HUD used to award stand-alone capital grants called "Replacement Housing Factor"—or RHF—grants to housing authorities when public housing units are demolished for redevelopment purposes. HUD no longer awards RHF (since 2017) and BHA has fully expended its historical RHF funding. Now, instead of RHF funding, HUD awards housing authorities additional funding through the single annual Capital Grant; the additional funding is awarded as what HUD calls Demo/Dispo Transitional Funding—or DDTF—but the DDTF is treated as an integral part of the annual capital fund grant and not as separate grants.