

Overview and Certification

Shelburne Housing Authority

Annual Plan for Fiscal Year 2022

For State-Aided Public Housing

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

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

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

The Shelburne Housing Authority's Annual Plan for their 2022 fiscal year includes the following components:

1. Overview and Certification
2. Capital Improvement Plan (CIP)
3. Maintenance and Repair Plan
4. Operating Budget
5. Narrative responses to Performance Management Review (PMR) findings
6. Policies
7. Waivers
8. Glossary
9. Other Elements
 - a. SHA July Meeting Minutes Annual Plan Public Hearing
 - b. Cover sheet for AP Survey
 - c. Tenant Satisfaction Survey 667 Program

Overview and Certification

State-Aided Public Housing Developments

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

Dev No	Type	Development Name	Num Bldgs	Year Built	Dwelling Units
667-1A	Elderly	HIGHLAND VILLAGE 667-1A	3	1977	46
Total			3		46

LHA Central Office

Shelburne Housing Authority

241 Millers Falls Road, Turners Falls, MA, 01376

Gina Govoni, Management Agent

Phone: 413-863-9781

Email: ggovoni@fcrhra.org

LHA Board of Commissioners

	<u>Role</u>	<u>Category</u>	<u>From</u>	<u>To</u>
Roger Bowen Weld	Member		06/23/2020	06/23/2025
Susan Flaccus	Chair	State Appointee	11/14/2018	11/11/2025
Kim Levitch	Member		03/22/2000	06/28/2026
Rita Maccini	Vice-Chair		07/17/2003	07/05/2023
Margaret Payne	Member		06/13/2019	06/23/2024

Plan History

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

REQUIREMENT		DATE COMPLETED
A.	Advertise the public hearing on the LHA website.	04/23/2021
B.	Advertise the public hearing in public postings.	04/22/2021
C.	Notify all LTO's and RAB, if there is one, of the hearing and provide access to the Proposed Annual Plan.	N/A
D.	Post draft AP for tenant and public viewing.	04/23/2021
E.	Hold quarterly meeting with LTO or RAB to review the draft AP. (Must occur before the LHA Board reviews the Annual Plan.)	N/A
F.	Annual Plan Hearing. Hosted by the LHA Board, with a quorum of members present. (For Boston, the Administrator will host the hearing.)	06/09/2021
G.	Executive Director presents the Annual Plan to the Board.	06/09/2021
H.	Board votes to approve the AP. (For Boston Housing Authority, the Administrator approves and submits the AP.)	07/14/2021

Certification

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

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

This certification applies to the following applications:

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

CERTIFICATION FOR SUBMISSION OF THE ANNUAL PLAN

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

Date of certification: 07/28/2021

The Department of Housing and Community Development (DHCD) completed its review of this Annual Plan (AP) on September 15, 2021. Review comments have been inserted into the plan.

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

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

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

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

The CIP includes the following parts:

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

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

Category of Funds	Allocation	Planned Spending	Description
Balance of Formula Funding (FF)	\$51,946.98		Total of all FF awards minus prior FF spending
LHA Emergency Reserve	\$5,194.70		Amount to reserve for emergencies
Net FF Funds (First 3 Years of the CIP)	\$46,752.28	\$94,997.57	Funds to plan & amount actually planned in the first 3 years of the CIP
ADA Set-aside	\$4,340.05	\$4,000.00	Accessibility projects
DMH Set-aside	\$0.00	\$0.00	Dept. of Mental Health facility
DDS Set-aside	\$0.00	\$0.00	Dept. of Developmental Services facility
Unrestricted Formula Funding (FF)	\$42,412.24	\$90,997.57	Funds awarded by DHCD to be used on projects selected by the LHA and approved by DHCD.
Special DHCD Funding	\$1,530.00	\$1,530.00	Targeted awards from DHCD
Community Development Block Grant (CDBG) Funds	\$0.00	\$0.00	Federal funds awarded by a city or town for specific projects.
Community Preservation Act (CPA) Funds	\$0.00	\$0.00	Community Preservation Act funds awarded by a city or town for specific projects.
Operating Reserve(OR) Funds	\$0.00	\$0.00	Funds from the LHA's operating budget.
Other Funds	\$0.00	\$0.00	Funds other than those in the above categories. See explanation below.
Total funds and planned spending	\$48,282.28	\$96,527.57	Total of all anticipated funding available for planned projects and the total of planned spending.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- o For projects with construction cost under \$10,000, the LHA has the sole responsibility to initiate, implement and manage the project. RCAT offers technical assistance upon request.
- o For projects with construction cost between \$10,000 and \$100,000 the RCAT will have lead responsibility to initiate, implement and manage the project with both DHCD and LHA involvement and oversight throughout the process. For projects in this range, the LHA will work with the RCAT Project Manager who will contact the LHA to initiate projects.
- o For projects with construction cost over \$100,000, or projects below that threshold that are complex or have a subsequent phase that exceeds \$100,000 construction cost, DHCD will take the lead and draft a WO or RFS to hire a designer to prepare plans and specs. RCAT will not be involved in the implementation of projects in this range and the LHA will continue to work directly with the DHCD Project Manager and DHCD design staff.

Capital Improvement Plan (CIP)

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

Cap Hub Project Number	Project Name	Development(s)	Total Cost	Amount Spent Prior to Plan	Remaining Planned for 2021	fy2022 Planned	fy2023	fy2024	fy2025	fy2026
268032	FF: SHA Community Room Enclosure	HIGHLAND VILLAGE 667-1A	\$5,441	\$0	\$0	\$3,024	\$2,418	\$0	\$0	\$0
268033	FF: Additional concrete walkways	HIGHLAND VILLAGE 667-1A	\$7,889	\$0	\$0	\$569	\$7,321	\$0	\$0	\$0
268037	Line painting for parking lot	HIGHLAND VILLAGE 667-1A	\$4,000	\$1,320	\$0	\$0	\$2,681	\$0	\$0	\$0
268038	H&S FY20: Tree removal due to overgrowth	HIGHLAND VILLAGE 667-1A	\$10,000	\$8,470	\$0	\$0	\$1,530	\$0	\$0	\$0
268040	Selected siding and trim repairs	HIGHLAND VILLAGE 667-1A	\$34,000	\$0	\$0	\$0	\$34,000	\$0	\$0	\$0
268041	667 Exterior lighting upgrade and additional lighting	HIGHLAND VILLAGE 667-1A	\$47,833	\$0	\$0	\$6,842	\$34,992	\$0	\$0	\$0
•	SHA Roof Replacement Project Building 2	HIGHLAND VILLAGE 667-1A	\$46,654	\$0	\$0	\$0	\$0	\$13,589	\$33,066	\$0
•	SHA Roof Replacement Project Building 3	HIGHLAND VILLAGE 667-1A	\$46,410	\$0	\$0	\$0	\$0	\$0	\$0	\$40,493
TOTALS			\$202,227	\$9,790	\$0	\$10,434	\$82,940	\$13,589	\$33,066	\$40,493

Capital Improvement Plan (CIP)

FUNDS IN ADDITION TO ANNUAL FORMULA FUNDING AWARD

Cap Hub Project Number	Project Name	DHCD Special Award Comment	Special DHCD Awards				Other Funding			
			Emergency Reserve	Compliance Reserve	Sustain- ability	Special Awards	CDBG	CPA	Operating Reserve	Other Funds
268038	H&S FY20: Tree removal due to overgrowth	H&S FY20: Tree removal due to overgrowth	\$0	\$0	\$0	\$10,000	\$0	\$0	\$0	\$0
TOTALS			\$0	\$0	\$0	\$10,000	\$0	\$0	\$0	\$0

Capital Improvement Plan (CIP) Narrative

Including Requests to DHCD & Supporting Statements

1. Request for increased spending flexibility.

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

Shelburne Housing Authority has not submitted an Alternate CIP.

2. Request for additional funding.

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

Shelburne Housing Authority has not requested additional funding.

3. Overall goals of the Housing Authority's CIP

We are addressing some safety issues with additional exterior lighting, selected siding and trim repairs and selected walkway improvements. Future priority is to complete roof replacements.

4. Changes from the Housing Authority's previous CIP

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

No major changes

5. Requirements of previous CIP approval

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

6. Quarterly capital reports

Our most recent quarterly capital report (form 80 and 90) was submitted on 02/26/2021.

7. Capital Planning System (CPS) updates

Our CPS facility data has been updated with current condition information, including changes resulting from projects completed in the past year, as of 03/01/2021.

8. Project priorities

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

9. High priority deficiencies

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

Future projects will be completed as funds become available.

10. Accessibility

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

11. Special needs development

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

12. Energy and water consumption

Our 12 most recent monthly energy reports are for months 4/2020 to 3/2021.

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

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

667-1A

There are no current projects to reduce electric use. We will continue to educate all tenants on conservation.

13. Energy or water saving initiatives

Shelburne Housing Authority is currently pursuing energy or water-saving audits or grants as not. A recent LEAN assessment is pending a report.

AP-2022-Shelburne Housing Authority-00306 had an energy audit under the Low-Income Energy Affordability Network (LEAN) program on 04/05/2021

14. Vacancy rate

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

2.2% c. 667 (DHCD Goal 2%)

0% c. 200 (DHCD Goal 2%)

0% c. 705 (DHCD Goal 2%)

Shelburne Housing Authority will address the excess vacancies in the following manner:

Vacancy rate is still very low and we will continue to work towards full occupancy.

15. Vacancies

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

CIP Approval For Shelburne Housing Authority for FY 2022

Formula Funding Capital Improvement Plan (CIP), WorkPlan 5001

9/14/2021

Congratulations! The CIP-2022 submitted by Shelburne Housing Authority is approved, subject to the following conditions:

- There were no assigned projects for FY 22 & 23 due to the LHA overspending their cap share. If an emergency comes up, we will handle it at the time of the emergency.
- Your LHA participates in the Regional Capital Assistance Team (RCAT) program and project implementation responsibilities are as follows:
 - o For projects with construction cost under \$10,000, the LHA has the sole responsibility to initiate, implement and manage the project. RCAT will offer technical assistance upon your request. DHCD recently revised the Small Project Guide to address statutory and policy changes. It is available on the web at <http://www.mass.gov/hed/docs/dhcd/ph/small-projects/dhcdsmallprojectsguide.pdf>. The Guide contains step-by-step instructions to help you make sure that your projects are done efficiently, cost-effectively and according to applicable statutes, rules and regulations. Please be sure to complete projects in accordance with the requirements and procedures described in the Guide.
 - o For projects with construction cost between \$10,000 and \$100,000 the RCAT will have lead responsibility to initiate, implement and manage the project with LHA involvement and oversight throughout the process. If you have projects in this range, you will be working with your RCAT Project Manager who will contact you to initiate your project(s). Please note that DHCD has increased the threshold for independent implementation to \$100,000 construction cost in response to the passage of Chapter 218. Projects with an estimated Construction cost greater than \$25,000 still require soliciting the professional services of an architect or engineer. (See DHCD Small Project guide "When to Hire a Designer" (<http://www.mass.gov/hed/docs/dhcd/ph/small-projects/dhcdsmallprojectsguide.pdf>)). The RCAT may be able to provide "In House" specifications with an estimated construction cost greater than \$25,000, but requires the approval of DHCD before proceeding.
 - o For projects with construction cost over \$100,000, or projects below that threshold that are complex or have a subsequent phase that exceeds \$100,000 construction cost, DHCD will take the lead and draft a WO or RFS to hire a designer to prepare plans and specs. At this point, RCAT will not be involved in the implementation of projects in this range and you will continue to work directly with your DHCD Project Manager and DHCD design staff.

There are no projects to be managed independently by the LHA or RCAT.

There are no large or complex projects to be managed by DHCD.

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

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

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

This document was created on 9/14/2021 by Jackline Monteiro-Mendes, Project Manager

Maintenance and Repair Plan

Maintenance Objective

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

About This Maintenance and Repair Plan

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

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

Classification and Prioritization of Maintenance Tasks

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

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

Emergency Request System

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

METHOD	CONTACT INFO.	TIMES
Call Answering Service	413-772-5562	04:30pm to 08:30am
Call LHA at Phone Number	413-863-9781	08:30am to 04:30pm

Though the text of DHCD's goal is to initiate a response to emergency work orders within 48 hours, staff typically respond within 1 hour to all emergency work orders. Assessment and coordination with other trades may take the full 48 hours to get someone on site and remedy the problem, but initial response is within 1 hour if during business hours.

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

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

Normal Maintenance Request Process

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

METHOD	CONTACT INFO.	TIMES
Text Phone Number		
Call Answering Service	413-772-5562	04:30pm to 08:30am
Call Housing Authority Office	413-863-9781	08:30am to 04:30pm
Submit Online at Website		24/7
Email to Following Email	workorders@fcrhra.org	24/7
Other	in person	scheduled office hours on site

Residents are encouraged to report the need of a work order to the property manager directly. Property Management has created a special work order link on the FCRHRA website as an option, the link emails all the property managers in the department to insure no emergency needs are over looked

Work Order Management

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

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

Work order classification used:

Emergency	
Vacancy	
Preventative Maintenance	
Routine	
Inspections	
Tenant Requests	

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

C. Our work order process includes the following steps:

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

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

During the past year emergency work orders are the priority due to COVID 19 restrictions. Staff has limited the amount of time in tenant units to maintain social distancing protocols. Staff has continued to complete requested work orders as needed for preventative maintenance concerns.

Maintenance Plan Narrative

Following are Shelburne Housing Authority's answers to questions posed by DHCD.

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

There were no findings in the PMR

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

Maintenance has been limited in tenant units for COVID 19 safety protocols. Preventative maintenance and requested maintenance has continued where safety protocols can be followed.

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

Based on COVID 19 safety protocols emergency work orders will take precedent and as restrictions are lifted we may be able to again complete health and safety inspections and complete work that may not have occurred during the last year.

D. Maintenance Budget Summary

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

	Total Regular Maintenance Budget	Extraordinary Maintenance Budget
Last Fiscal Year Budget	\$51,870.00	\$5,200.00
Last Fiscal Year Actual Spending	\$55,076.00	\$7,300.00
Current Fiscal Year Budget	\$0.00	\$0.00

E. Unit Turnover Summary

# Turnovers Last Fiscal Year	14
Average time from date vacated to make Unit "Maintenance Ready"	62 days
Average time from date vacated to lease up of unit	161 days

Attachments

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

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

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

January Preventive Maintenance

Property managers will enter appropriate task by property

Follow up for closure at months end

TASK

Common Room Areas of 667
Wash Walls
Clean Kitchen Stoves and Cabinets
Wash and Polish Floors
Mid Winter Service Check on Snowblowers
Trim any Snow Bent Branches or Report removal for spring
Check Oil Tank leves where appropriate (heat)
Check locations with sump pumps for testing
Check laundry dryer vents and clear lint traps
Refill Sand buckets
Check plumbing in bathrooms for leaking or need to change washers
Monthly Check of the emergency lighting battery test

March Preventive Maintenance

Property Managers will enter appropriate tasks by property

Follow up for closure at months end

TASK

Begin Sand Clean up in Walkways and Stairwells (sweeping)
Review battery Stock for April smoke detector battery change
Review Stock for need of smoke detectors
Begin picking up sticks and branches(snow pending)
Check all water heaters and boilers for leaks and for spring cleaning
Make list of lawnmowers on property for spring tune up
Clean all common are light fixtures and glass
Place rodent traps in basements and storage areas
Review dates on Fire extinguisher report to office of out of date
Check laundry dryer vents and clear lint traps
Clean all common hallways of sand, inspect for damage
Wipe down common area furniture

May Preventive Maintenance

Property Managers will enter appropriate tasks by property

Follow up for closure at months end

TASK

Clean-undlog the sewer drains
Wash and wax hallways of common areas
Replace clothesline ropes
Inspect tah atll screens are in place and good condition
Place all common room air conditioners in and secure
Preapare summer work list of property for weekly completion
Paint trim work of common doors and doors

July Preventive Maintenance

Property managers will enter appropriate task by property

Follow up for closure at months end

TASK

Common Room Areas of 667
Wash Walls
Clean Kitchen Stoves and Cabinets
Wash and Polish Floors
Mid Winter Service Check on Snowblowers
Trim any Snow Bent Branches or Report removal for spring
Check Oil Tank leveasl where appropriate
Check locations with sump pumps for testing
Check laundry dryer vents and clear lint traps
Refill Sand buckets
Check plumbing in bathrooms for leaking or need to change washers
Monthly Check of the emergency lighting battery test

September Preventive Maintenance

Property managers will enter appropriate task by property

Follow up for closure at months end

TASK

Create boiler list for annual service (assigned locations per maintenance)
Inspect/repair/ replace fall tools need rakes, etc
Common area windows should be cleaned
Common area rugs shampoo as needed
Review snowblowers and prepare for winter tune up (coordinated effort)
Trim back any vegetation growing to close to buildings
Check Oil Tank leveasl where appropriate
Check locations with sump pumps for testing
Check laundry dryer vents and clear lint traps
replace damaged Sand buckets
Get count of need of batteries for fall battery change over

November Preventive Maintenance

Property managers will enter appropriate task by property

Follow up for closure at months end

TASK

Maintain clear walkways of leaf debris
Get sand to location to prepare buckets for winter
Schedule additional staff for ladders for gutter (weather permitting)
Snow blowers should have retruned
Check locations for on site ice melt-have order placed
Check that the winter spreaders are in working order/replace as needed
Check all porches for deariance of items before snow fall
Reminder to PM to notice tenants to remove items for plowing
Put out Stakes for notice of plowing: outline drives
Check shovels for replacement

February Preventive Maintenance

Property managers will enter appropriate task by property

Follow up for closure at months end

TASK

Refill All sand buckets at location entrances
Inventory Supplies in locations with garages
Check outside walkway/hallway lighting
Check gutters and drains for ice removal and any plow damage
Check Water heaters for leaking or corrosion
Remove any screens that are worn or damaged, send to
Check Oil Tank leveasl where appropriate
Check locations with sump pumps for testing
Check laundry dryer vents and clear lint traps
Refill Sand buckets
Check plumbing in bathrooms for leaking or need to change washers
Monthly Check of the emergency lighting battery test
Pumps - sump pump in basement, confirm operational

April Preventive Maintenance

Property Managers will end appropriate tasks by property

Follow up for closure at months end

TASK

Begin grounds care: trash, inspect for plow damage and report to office
Sweep doorways and and door jams
Inspect all gutters and down spouts
Clean up, need for soil replacement, damage bushes
Begin window washing in common rooms and hallway windows
Create paint list and inspect trim work for repairs
Review roofs for any winter damage
Start cleaning maintenance rooms, sweep and prepare for summer work
Sweep around dumpsters

June Preventive Maintenance

Property Managers will end appropriate tasks by property

Follow up for closure at months end

TASK

Cut back all vegetation from buildings (2 feet) no touching the building
Cut back all vegetation from walkways or hanging over parking areas
Clear drainage waterways,add stones to drain areas preventing washing
Paint outside lamp posts where needed
Participate in unit inspections as scheduled
Trim any Snow Bent Branches or Report removal for spring
Check laundry dryer vents and clear lint traps

August Preventive Maintenance

Property Managers will end appropriate tasks by property

Follow up for closure at months end

TASK

Check and clean all common room air conditioner filters
Check all water tanks for sepage/humidity damages or rusting
Check all basements for ventilation and humidity issues
Check and repair any lose railings on porches
Check gutters for animal nesting and clear
Check eves for nesting and clear
Check dumpsters for heat related odors and request santizing
Follow up on grills and yard fire pits: remove as needed
paint hallways and common doors
Follow up on Annual Inspections for completion/check in with PM's

October Preventive Maintenance

Property Managers will end appropriate tasks by property

Follow up for closure at months end

TASK

Maintain clear walkways of leaf debris
Get sand to location to prepare buckets for winter
Schedule additional staff for ladders for gutter
Remove all common area air conditioners
Snow blowers should have retruned
Remove gas and add stabilizer to lawn mowers
Get lawn mowers off properties to store for winter
Common hallways should get waxedd prior to winter
use shop vaccum on baseboard heating units to clear dust
Refill Sand buckets
Begin battery changes in smoke detectors

Clear lighting of any nesting and bugs/replace bulbs as needed

December Preventive Maintenance

Property Managers will end appropriate tasks by property

Follow up for closure at months end

TASK

Finish any outside work prior to snow and ground freeze
Ice melt should be on property
Finish and leave clean up and drainage prior to snow fall
stabilize all leaf blowers and weed whackers - drain gas
Check properties with generator-Feul level and did maintenance occur
Get all snow blowers on property if not completed
Door hinges should be greased

January Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Common room areas of 667

Wash walls

Clean kitchen stoves and cabinets

Wash and polish floors

Mid-Winter service check on Snowblowers

Trim any snow bent branches or report removal for spring

Check oil tank levels where appropriate (heat)

Check locations with sump pumps for testing

Check laundry dryer vents and clear lint traps

Refill sand buckets

Check plumbing in bathrooms for leaking or need to change washers

Monthly check of the emergency lighting battery test

February Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Refill all sand buckets at location entrances

Inventory supplies in locations with garages

Check outside walkway/hallway lighting

Check gutters and drains for ice removal and any plow damage

Check water heaters for leaking or corrosion

Remove any screens that are worn or damaged, send for repair

Check oil tank levels where appropriate

Check locations with sump pumps for testing

Check laundry dryer vents and clear lint traps

Refill sand buckets

Check plumbing in bathrooms for leaking or need to change washers

Monthly check the emergency lighting batter test

Pumps-Sump pump in basement, confirm if operational.

March Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Begin sand clean up in walkways and stairwells (sweeping)

Review battery stock for April smoke detector battery change

Review stock for need of smoke detectors

Begin picking up sticks and branches (snow pending)

Check all water heaters and boilers for leaks and for spring cleaning

Make list of lawnmowers on property for spring tune up

Clean all common area light fixtures and glass

Place rodent traps in basements and storage areas

Review dates on fire extinguisher report to office if out of date

Check laundry dryer vents and clear lint traps

Clean all common hallway of sand, inspect for damage

Wipe down common area furniture

April Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Begin grounds care: trash, inspect for plow damage and report to office
Sweep doorways and door jams
Inspect all gutters and down spouts
Clean up, need for soil replacement, damage bushes
Begin window washing in common rooms and hallway windows
Create paint list and inspect trim work for repairs
Review roofs for any winter damage
Start cleaning maintenance rooms, sweep and prepare for summer work
Sweep around dumpsters

May Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Clean-unclog the sewer drains
Wash and wax hallways of common areas
Replace clothesline ropes
Inspect that all screens are in place and good condition
Place all common room air conditioners in and secure
Prepare summer work list of property for weekly completion
Paint trim work of common doors and hallways

June Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Cut back all vegetation from buildings (2 feet) no touching the building
Cut back all vegetation from walkways or hanging over parking areas
Clear drainage waterways, add stones to drain areas preventing washing
Paint outside lamp posts where needed
Participate in unit inspections as scheduled
Trim any snow bent branches or report removal for spring
Check laundry dryer vents and clear lint traps

July Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Common room areas of 667
Wash walls
Clean kitchen stoves and cabinets
Wash and polish floors
Service check on Snowblowers
Trim any snow bent branches or report removal for spring
Check oil tank levels where appropriate (heat)
Check locations with sump pumps for testing
Check laundry dryer vents and clear lint traps
Refill sand buckets
Check plumbing in bathrooms for leaking or need to change washers
Monthly check of the emergency lighting battery test

August Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Check and clean all common room air conditioner filters
Check all water tanks for seepage/humidity damages or rusting
Check all basements for ventilation and humidity issues
Check and repair any lose railings on porches
Check gutters for animal nesting and clear
Check dumpsters for heat related odors and request sanitizing
Follow up on grills and yard fire pits: remove as needed
Paint hallways and common doors
Follow up on annual inspections for completion/check in with PM's.

September Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Create boiler list for annual service (assigned locations per maintenance)
Inspect/repair/replace fall tools, need rakes, etc.
Common area windows should be cleaned
Common area rugs shampoo as needed
Review snowblowers and prepare for winter tune up (coordinated effort)
Trim back any vegetation growing too close to buildings
Check oil tank level where appropriate
Check locations with sump pumps for testing
Check laundry dryer vents and clear lint traps
Replace damaged sand buckets
Get count of need of batteries for fall battery change over

October Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Maintain clear walkways of leaf debris
Get sand to location to prepare buckets for winter
Schedule additional staff for ladders for gutter
Remove all common area air conditioners
Snow blowers should have returned from servicing
Remove gas and add stabilizer to lawn mowers
Get lawn mowers off properties to store for winter
Common hallways should get waxed prior to winter
Use shop vacuum on baseboard heating units to clear dust
Refill sand buckets
Begin battery changes in smoke detectors
Clear lighting of any nesting and bugs/replace bulbs as needed

November Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Maintain clear walkways of leaf debris
Get sand to location to prepare buckets for winter

Schedule additional staff for ladders for gutter (weather permitting)
Snow blowers should have returned
Check locations for on site ice melt-have order placed
Check that the winter spreaders are in working order/ replace as needed
Check all porches for clearance of items before snow fall
Reminder to PM to notice tenants to remove items for plowing
Put out stakes for notice of plowing: outline drives
Check shovels for replacement

December Preventative Maintenance:

Property managers will enter appropriate task by property follow up for closure at months end.

TASK

Finish any outside work prior to snow and ground freeze
Ice melt should be on property
Finish and leave clean up and drainage prior to snow fall
Stabilize all leaf blowers and weed whackers-drain gas
Check properties with generator-fuel level and did maintenance occur
Get all snow blowers on property if not completed
Door hinges should be greased



SHELburne HOUSING AUTHORITY
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Shelburne Housing Authority Deferred Maintenance Plan

Definition: Deferred Maintenance is maintenance, needed upgrades, or repairs that need to be deferred into the future for either financial reasons or weather related scheduling. There will be times when maintenance will observe a project or needed repairs and time or resources do not allow the project to go forward.

This plan outlines how maintenance, property managers and tenant requests will be scheduled and addressed in the future as a deferred maintenance request.

Deferred maintenance should not be considered as a Capital Needs plan, all department staff should refer projects that could be a Capital Improvement to management to add the project to the CIP or formula funding projects list that will occur annually.

Examples of deferred maintenance:

- Maintenance upgrade needed that should occur when a unit is vacant.
- Replacement of carpets that may be stained or have normal wear and tear
- Kitchen counters that are past their useful life
- Ceilings that may need to be repainted
- Seasonal Items that cannot be completed due to weather
- Trees and shrubs that with snow on them lean over onto the building or in pathways
- Hallways that need painting but the outside is being painted in the summer
- Areas where snow melts and does not drain properly

Funding:

Again, where a carpet may be in need of replacement due to staining it may be cost effective to clean it to extend its life through the next lease up

Water drainage may need extensive repaving or to rent machinery to complete the task

Efficiency:

Scheduling plumbers for facet replacement could be combined with upgrades to the outside faucet

Equal Housing Opportunity



Organization tasks and maintenance upkeep:

At time there needs to be a clean out of a garage or storage area, restocking or taking items to the transfer station.

Items not to be included in the plan:

Life and Safety Items: All life and safety hazards must not be moved or deferred. These items must be completed within the 24-48 hour requirement.

Backlog:

Work orders should not be deferred to “get it off your list”

Minor repairs:

Small cracks in the wall or a tile should not just be moved to the plan. This should be discussed with the property manager for approval or to create a new work order.

What information should be included in the deferred maintenance plan:**See the deferred maintenance plan spreadsheet:**

Item

Date added to deferred maintenance plan

Item description

Location or unit number

Reason deferred estimated costs

Materials needed

Original work order number

Target completion date

Actual completion date

Any other comments

When you add an item to deferred maintenance plan:

All the required information must be provided for the plan to work

The plan should be reviewed weekly or biweekly with maintenance staff and the director to be sure the timing and funding has been appropriated to complete the work.

It will be very important that the items listed are complete so that all considerations may be made prior to initiating the plan for the best outcome.

Operating Budget

The tables on the following pages show the approved budget and actual income and spending per budget account (row) for the fiscal year ending 09/30/2020. It also shows the approved budget for the current year (2021) if there is one, and the percent change from last year's spending to this year's approved budget. The final column shows the current approved amount for each account divided by the number of housing units and by 12 months to show the amount per unit per month (PUM). The chart does not show a draft budget for the coming fiscal year as that will typically be developed in the final month of the fiscal year.

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

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

LHA Comments

As of 4/23/21, the required publishing date, the FY21 budget has not yet been reverted by DHCD as is therefore populating all zeros.

Operating Reserve

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

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

The Shelburne Housing Authority operating reserve at the end of fiscal year 2020 was \$69,157.00, which is 50.3% of the full reserve amount defined above.

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Shelburne Housing Authority.						
REVENUE						
Account Number	Account Class	2020 Approved Revenue Budget	2020 Actual Amounts Received	2021 Approved Revenue Budget	% Change from 2020 Actual to 2021 Budget	2021 Dollars Budgeted per Unit per Month
3110	Shelter Rent - Tenants	\$173,942.00	\$182,250.00	\$0.00	0%	\$0.00
3111	Shelter Rent - Tenants - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
3115	Shelter Rent - Federal Section 8	\$0.00	\$0.00	\$0.00	0%	\$0.00
3190	Nondwelling Rentals	\$0.00	\$0.00	\$0.00	0%	\$0.00
3400	Administrative Fee - MRVP	\$0.00	\$0.00	\$0.00	0%	\$0.00
3610	Interest on Investments - Unrestricted	\$25.00	\$0.00	\$0.00	0%	\$0.00
3611	Interest on Investments - Restricted	\$0.00	\$0.00	\$0.00	0%	\$0.00
3690	Other Revenue	\$7,481.00	\$5,999.00	\$0.00	0%	\$0.00
3691	Other Revenue - Retained	\$0.00	\$21,517.00	\$0.00	0%	\$0.00
3692	Other Revenue - Operating Reserves	\$0.00	\$0.00	\$0.00	0%	\$0.00
3693	Other Revenue - Energy Net Meter	\$0.00	\$1,227.00	\$0.00	0%	\$0.00
3801	Operating Subsidy - DHCD (4001)	\$112,315.00	\$86,916.00	\$0.00	0%	\$0.00
3802	Operating Subsidy - MRVP Landlords	\$0.00	\$0.00	\$0.00	0%	\$0.00
3803	Restricted Grants Received	\$0.00	\$0.00	\$0.00	0%	\$0.00
3920	Gain/Loss From Sale/Disp. of Prop.	\$0.00	\$0.00	\$0.00	0%	\$0.00
3000	TOTAL REVENUE	\$293,763.00	\$297,909.00	\$0.00	0%	\$0.00

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Shelburne Housing Authority.						
EXPENSES						
Account Number	Account Class	2020 Approved Expense Budget	2020 Actual Amounts Spent	2021 Approved Expense Budget	% Change from 2020 Actual to 2021 Budget.	2021 Dollars Budgeted per Unit per Month
4110	Administrative Salaries	\$30,982.00	\$26,704.00	\$0.00	0%	\$0.00
4120	Compensated Absences	\$0.00	\$627.00	\$0.00	0%	\$0.00
4130	Legal	\$0.00	\$891.00	\$0.00	0%	\$0.00
4140	Members Compensation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4150	Travel & Related Expenses	\$4,500.00	\$1,931.00	\$0.00	0%	\$0.00
4170	Accounting Services	\$0.00	\$0.00	\$0.00	0%	\$0.00
4171	Audit Costs	\$3,150.00	\$2,400.00	\$0.00	0%	\$0.00
4180	Penalties & Interest	\$0.00	\$0.00	\$0.00	0%	\$0.00
4190	Administrative Other	\$43,169.00	\$47,646.00	\$0.00	0%	\$0.00
4191	Tenant Organization	\$0.00	\$0.00	\$0.00	0%	\$0.00
4100	TOTAL ADMINISTRATION	\$81,801.00	\$80,199.00	\$0.00	0%	\$0.00
4310	Water	\$22,000.00	\$9,784.00	\$0.00	0%	\$0.00
4320	Electricity	\$85,000.00	\$73,354.00	\$0.00	0%	\$0.00
4330	Gas	\$0.00	\$0.00	\$0.00	0%	\$0.00
4340	Fuel	\$0.00	\$0.00	\$0.00	0%	\$0.00
4360	Net Meter Utility Debit/Energy Conservation	\$0.00	\$0.00	\$0.00	0%	\$0.00
4390	Other	\$12,600.00	\$13,041.00	\$0.00	0%	\$0.00
4391	Solar Operator Costs	\$0.00	\$0.00	\$0.00	0%	\$0.00
4392	Net Meter Utility Credit (Negative Amount)	\$0.00	\$0.00	\$0.00	0%	\$0.00
4300	TOTAL UTILITIES	\$119,600.00	\$96,179.00	\$0.00	0%	\$0.00

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Shelburne Housing Authority.						
EXPENSES						
Account Number	Account Class	2020 Approved Expense Budget	2020 Actual Amounts Spent	2021 Approved Expense Budget	% Change from 2020 Actual to 2021 Budget	2021 Dollars Budgeted per Unit per Month
4410	Maintenance Labor	\$36,796.00	\$35,341.00	\$0.00	0%	\$0.00
4420	Materials & Supplies	\$6,500.00	\$7,903.00	\$0.00	0%	\$0.00
4430	Contract Costs	\$8,574.00	\$11,832.00	\$0.00	0%	\$0.00
4400	TOTAL MAINTENANCE	\$51,870.00	\$55,076.00	\$0.00	0%	\$0.00
4510	Insurance	\$7,171.00	\$9,502.00	\$0.00	0%	\$0.00
4520	Payment in Lieu of Taxes	\$0.00	\$1,250.00	\$0.00	0%	\$0.00
4540	Employee Benefits	\$28,280.00	\$23,612.00	\$0.00	0%	\$0.00
4541	Employee Benefits - GASB 45	\$0.00	\$0.00	\$0.00	0%	\$0.00
4542	Pension Expense - GASB 68	\$0.00	\$0.00	\$0.00	0%	\$0.00
4570	Collection Loss	\$0.00	\$0.00	\$0.00	0%	\$0.00
4571	Collection Loss - Fraud/Retroactive	\$0.00	\$0.00	\$0.00	0%	\$0.00
4580	Interest Expense	\$0.00	\$0.00	\$0.00	0%	\$0.00
4590	Other General Expense	\$0.00	\$0.00	\$0.00	0%	\$0.00
4500	TOTAL GENERAL EXPENSES	\$35,451.00	\$34,364.00	\$0.00	0%	\$0.00
4610	Extraordinary Maintenance	\$5,200.00	\$7,300.00	\$0.00	0%	\$0.00
4611	Equipment Purchases - Non Capitalized	\$4,000.00	\$1,900.00	\$0.00	0%	\$0.00
4612	Restricted Reserve Expenditures	\$0.00	\$0.00	\$0.00	0%	\$0.00
4715	Housing Assistance Payments	\$0.00	\$0.00	\$0.00	0%	\$0.00
4801	Depreciation Expense	\$0.00	\$56,083.00	\$0.00	0%	\$0.00
4600	TOTAL OTHER EXPENSES	\$9,200.00	\$65,283.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$297,922.00	\$331,101.00	\$0.00	0%	\$0.00

Consolidated Budget (400-1) for all state-aided 667 (Elderly), 200 (family), and 705 (scattered site family) developments owned by Shelburne Housing Authority.						
SUMMARY						
Account Number	Account Class	2020 Approved Budget	2020 Actual Amounts	2021 Approved Budget	% Change from 2020 Actual to 2021 Budget	2021 Dollars Budgeted per Unit per Month
3000	TOTAL REVENUE	\$293,763.00	\$297,909.00	\$0.00	0%	\$0.00
4000	TOTAL EXPENSES	\$297,922.00	\$331,101.00	\$0.00	0%	\$0.00
2700	NET INCOME (DEFICIT)	\$-4,159.00	\$-33,192.00	\$0.00	0%	\$0.00
7520	Replacements of Equip. - Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00
7540	Betterments & Additions - Capitalized	\$0.00	\$0.00	\$0.00	0%	\$0.00
7500	TOTAL NONOPERATING EXPENDITURES	\$0.00	\$0.00	\$0.00	0%	\$0.00
7600	EXCESS REVENUE OVER EXPENSES	\$-4,159.00	\$-33,192.00	\$0.00	0%	\$0.00

DHCD Review Comment

DHCD staff have reviewed the LHA's comments addressing the budget information and have the following comments:

Budget had been reverted for modifications. All modifications have been made and budget had been approved.

Explanation of Budget Accounts

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

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

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

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

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

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

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

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

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

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

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

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

3693: Other Revenue – Net Meter: This account should normally be credited with 75% of the total net meter credit savings realized by a deficit LHA, while surplus LHAs with net meter credit savings would enter \$0 here. Savings are calculated as the value of the net meter credits appearing on the LHA’s electric bills (or, in some cases, paid in cash to the LHA by their utility company), minus the cost of the payments made to the solar power developer under their Power Purchase Agreement (PPA). Deficit LHAs normally may retain 25% of the savings. That amount should be included as Other Revenue – Retained on line #3691. However, please note that for the period 7/1/16 through 6/30/20 all LHAs may retain 100% of their total net meter credit savings, and should report those savings as Other Revenue – Retained on line #3691. LHAs can keep 50% of savings effective 7/1/2020.

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

3802: Operating Subsidy – MRVP/AHVP Landlords:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4520: Payments in Lieu of Taxes:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Explanation of PMR Criteria Ratings

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

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

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

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

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

Policies

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

Policy	Last Ratified by Board Vote	Notes
*Rent Collection Policy	06/10/2020	
*Personnel Policy	06/07/2021	HRA Policy
*Capitalization Policy	07/06/2020	HRA Policy - from ICM
*Procurement Policy	06/10/2020	
*Grievance Policy	07/08/2020	
Pet Policy	09/09/2020	
Smoking Policy	08/12/2020	

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

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

Waivers

AP-2022-Shelburne Housing Authori-00306 has no current waivers from the regulations of the Department of Housing and Community Development (DHCD).

Glossary

ADA: Americans with Disabilities Act. Often used as shorthand for accessibility related issues or improvements.

AHVP: Alternative Housing Voucher Program

Alternative Housing Voucher Program provides rental vouchers to disabled applicants who are not elderly and who have been determined eligible for Chapter 667 (elderly and disabled) housing.

Allowable Non-Utility Expense Level (ANUEL) is the amount of non-utility expense allowed for each local housing authority based upon the type(s) of housing programs administered.

ANUEL: Allowable Non-Utility Expense Level

AP: Annual Plan

Annual Plan: A document prepared by each Local Housing Authority, incorporating the Capital Improvement Plan (CIP), Maintenance and Repair Plan, Budget, responses to the Performance Management Review, and other elements.

Cap Share is the amount of Formula Funding spending approved by DHCD for each year.

Capital Funds: Funds provided by DHCD to an LHA for the modernization and preservation of state-aided public housing, including Formula Funds and Special Capital Funds.

Capital Needs Assessment, similar to the CIP, often used for developments in the Section 8 New Construction/Substantial Rehabilitation program. Such developments are generally not eligible for state capital funds and therefore do not participate in the CIP process. However, to track their ongoing capital needs and plan for construction projects to address those needs, they often conduct a CNA to determine when building systems will wear out and need to be replaced, and what replacement will cost, so they can plan to ensure that the necessary funding will be available

Capital Projects are projects that add significant value to an asset or replace building systems or components. Project cost must be greater than \$1000.

CIMS is a web-based software system used for creating CIP's and Annual Plans. For the CIP, the CIMS program allows the LHA to prioritize, select and schedule projects, assign funding sources and direct project spending to specific fiscal years to create a CIP that is consistent with the LHA's FF award amount and FF cap shares, plus any additional funding resources the LHA has identified. The LHA submits its CIP and DHCD conducts its review of the LHA's CIP in CIMS. For the Annual Plan CIMS imports data from other DHCD systems and combines that with data entered by the LHA.

CIP: A Capital Improvement Plan (CIP) is a five (5) year plan which identifies capital projects, provides a planning scope, schedule and budget for each capital project and identifies options for financing and implementing the plan. The contents of a CIP are limited to available resources. An approved CIP is required in order to receive Formula Funds.

CNA: Capital Needs Assessment

CPS is DHCD's transparent Web-based capital planning system that catalogues the condition of every building and site in the statewide public housing portfolio, providing LHAs with detailed technical information to make strategic long-term capital investments. It includes a Facility Condition Index (FCI) for every development that compares the value of expired components of a development relative to its replacement cost.

Deferred Maintenance is maintenance, upgrades, or repairs that are deferred to a future budget cycle or postponed for some other reason. Sometimes it is referred to as extraordinary maintenance.

Deficit housing authority: a housing authority whose income (mainly from rent) does not cover all its normal operating costs in its approved operating budget, and which therefore operates at a deficit and requires operating subsidy from DHCD.

DHCD: Massachusetts Department of Housing & Community Development

Extraordinary Maintenance: see the description for budget line 4610 in the Explanation of Budget Accounts in the Budget Section of this Annual Plan.

FF: Formula Funding

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

FYE: Fiscal Year End

HHA Administrative Fee is the fee paid to an HHA from the RCAT Program budget.

HHA: Host Housing Authority for the RCAT program.

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

HUD: U.S. Department of Housing and Urban Development

LHA: Local Housing Authority

LTO: Local Tenants Organization

Management and Occupancy Report: This is an annual HUD review process that is used to evaluate the performance of developments in various HUD housing programs, including the Section 8 New Construction/Substantial Rehabilitation program, which some LHAs operate. It is similar to the state PMR process in that it evaluates LHA performance on variety of financial, housing quality, and other standards

Massachusetts Rental Voucher Program (MRVP) is a state-funded program that provides rental subsidies to low-income families and individuals.

MOR: Management and Occupancy Report

MRVP: Massachusetts Rental V DHCD's annual review of each housing authority's performance. It pulls together data on the authority's occupancy rates, tenant accounts receivables, accounts payable, budget variance, operating reserve, capital improvement plan submission, capital spending, annual inspections and work order and maintenance systems to identify and address areas of strength and areas for development. Its goal is to allow DHCD and the LHA to

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

Performance Management Review (PMR):

PMR: Performance Management Review

RCAT: Regional Capital Assistance Team

Regional Capital Assistance Team: One of three organizations employed at HHAs designated by the Department to carry out the RCAT Program.

Sec.8 NC/SR (or S8NCSR): Section 8 New Construction and Substantial Rehabilitation

Section 8 New Construction and Substantial Rehabilitation (Sec.8 NC/SR): This term refers to a federal HUD housing program operated at a small number of state public housing developments whose construction was funded by state grants, but whose ongoing operating costs are supported by project-based subsidies from HUD's federal Section 8 program, rather than from state public housing operating funds..

Special Awards: In addition to allocations to each LHA, DHCD has created limited set aside funds to provide for extreme emergency or code compliance needs which are beyond the capacity of an LHA's current FF balance.

Surplus housing authority: a housing authority whose income (mainly from rent) covers all its normal operating costs in its approved operating budget, and which therefore operates at a surplus and does not require operating subsidy from DHCD.

Attachments

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

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

- SHA July Meeting Minutes Annual Plan Public Hearing
- Cover sheet for AP Survey
- Tenant Satisfaction Survey 667 Program



SHELBURNE HOUSING AUTHORITY
Highland Village • Shelburne Falls, MA 01370
Executive Office: 241 Millers Falls Road • Turners Falls, MA 01376
Telephone: (413) 863-9781 • Facsimile: (413) 863-9289

SHELBURNE HOUSING AUTHORITY
Annual Plan Meeting
June 9, 2021

Commissioners Present: S. Flaccus K. Levitch M. Payne R. Bowen Weld

Commissioners Absent: R. Maccini

Staff Present: G. Govoni L. Cornish P. Parmakian M. Taylor L. Vieland

Public Present: P. Clark B. Hoffman

FY22 Annual Plan Review:

G. Govoni began with reviewing the Boards term dates. Commissioner Payne noted her term expiration date is incorrect. Commissioner Levitch believes he started in 2006 not 2011.

The 3 year information for the Capital Improvement Plan is not populating as a result of the budget being reverted. L. Cornish clarified that when referring to reverting the budget DHCD means they are not accepting it and sending it back to be fixed.

G. Govoni reviewed the current formula funding projects for FY2021-FY2022 and those projects, that while listed as part of the Capital Improvement Plan for FY2023-FY2026, are not funded yet.

A question was posed as to whether the residents & Board would have input in regard to the location of the exterior lighting upgrade.

G. Govoni explained that we are working with the LEAN program, inquiring if they can assist with offsetting some of the lighting cost to see if additional lighting units might be feasible within the budget. There is funding to replace and upgrade the current lighting to be more energy efficient. There's not enough funding to create any additional lighting or upgrading of the lamp posts. With upgrading to different fixtures and bulbs it should allow for more lighting of the current areas.

L. Cornish clarified that only a certain amount of money is received for these projects. Working with the LEAN program, focusing on electrical upgrades, will allow for some savings that may be able to be used toward another project.

Equal Housing Opportunity



G. Govoni validated that all projects, currently funded or not funded, are needed. A new representative from RCAT is becoming familiar with the property and with that knowledge will provide more accurate estimations for costs of projects.

G. Govoni confirmed the focus of lighting is on the exterior of the buildings, not the interior.

Vacancy rate noted in the AP is at 2.2%, just slightly above the DHCD goal of 2%.

Maintenance and repair plan includes details about the preventative plan and the emergency maintenance plan. Last fiscal year's actual spending was over what was budgeted. The current fiscal year budget is not depicted due to the reverted budget.

G. Govoni will amend the plan regarding the reason for the high unit turnover summary if there is something not already noted in the plan.

Under the operating budget it states that as of 4/23/21, the FY21 budget had not yet been reverted by DHCD therefore populating all zeros. As of June 1, 2021 the budget was reverted by DHCD and they are awaiting direction from the Board.

P. Parmakian clarified that the notation under the maintenance and repair plan regarding assistance with emergencies are initiated 24-48 hours is related to the closing of the work order, not the time frame in which the emergency is dealt with. Response to emergency via phone to the resident is typically within 10 minutes of the placed call.

G. Govoni suggests that this section be revised stating responses will be made within the hour the call is received and the work will be completed within 24 hours, unless inclement weather compromises the situation. It can also be added that issues are fixed same day, less than 24 hours.

The annual operating budget incorrectly states that the operating reserve at the end of fiscal year 2020 was 50.3% of the full reserve amount.

The Performance Management Review (PMR) Findings will not be published by DHCD for fiscal years ending 3/31/20-12/31/20 due to Covid.

The policies starred are the policies required by DHCD to be in the plan and that they are less than 3 years old.

The 2019 survey compares SHA to other Local housing authorities in Western MA.

G. Govoni proposed that once the changes are made to the plan it will be brought back to the Board for approval at the scheduled July meeting.

Commissioner Levitch moved and Commissioner Payne seconded a motion to adjourn the annual plan meeting at 5:19 p.m.

Respectfully submitted,

A handwritten signature in black ink, reading "Gina Govoni". The signature is written in a cursive style with a large, stylized "G" and "G".

Gina Govoni
Secretary ex officio

Resident Surveys – Background

Since 2016 DHCD has been working with the Center for Survey Research (CSR) at the University of Massachusetts Boston to survey residents in the state public housing units it oversees. The surveys are confidential, mailed directly to the residents and returned to the Center by mail (or, starting in 2019, completed on-line). CSR surveys residents of elderly/disabled units (also known as c. 667 developments) and family units (also known as c. 705 and c. 200 developments).

During each round, all individual residents are mailed surveys, with one exception: in the case of the twelve housing authorities with more than 225 c. 200 family units, a randomly selected group of 225 residents was surveyed at each housing authority. This group was determined to be large enough to generate statistically useful results. In both rounds, responses from c.200 and c.705 residents are always combined together.

Round One Surveys (2016 – 2018)

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

Notes re: Round One Surveys

1. Generally, if there were at least twenty responses from residents of an authority's c.667 units or from their c.200/705 units, then there is a separate report for that program.
2. To protect resident confidentiality, survey results are generally reported ONLY for authorities that had at least twenty total resident responses from their combined c.667/200/705 residents. Therefore, authorities that didn't have twenty responses do not have a published survey report.

Round Two Surveys (2019 – 2022)

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

Notes re: Round Two Surveys

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

Shelburne Housing Authority

Chapter 667 Housing

Fall 2019

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

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

In the **Shelburne Housing Authority**, surveys were sent to a total of **46** Shelburne housing units (Chapter 667); **20** surveys were completed.

This report provides some information about how the residents from the **Shelburne Housing Authority** who answered the survey responded. It compares their answers to those from residents in the entire state and to those from small LHAs in Western Massachusetts. These small LHAs in Western Massachusetts include: Adams, Brimfield, Granby, Hatfield, Holyoke, Lee, Ludlow, Montague, Orange, Palmer, Shelburne, Southwick, and Williamstown.

Communication

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

	Shelburne Housing Authority	Small LHAs in Western MA *	Entire State
Felt they were usually or always treated with courtesy and respect when they contacted management.....	100%	88%	87%
Knew the Executive Director held a meeting with residents.....	56%	47%	54%

* Small LHAs in Western Massachusetts include: Adams, Brimfield, Granby, Hatfield, Holyoke, Lee, Ludlow, Montague, Orange, Palmer, Shelburne, and Southwick.

Maintenance and Repair

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

	Shelburne Housing Authority	Small LHAs in Western MA	Entire State
Felt they were treated with courtesy and respect when they contacted maintenance.....	100%	91%	89%
Were contacted by the Housing Authority before entering their apartment.....	100%	95%	92%

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

Building maintenance:

Shelburne Housing Authority



Small LHAs in Western MA

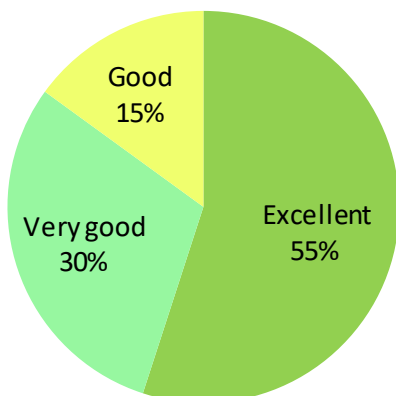


Entire State

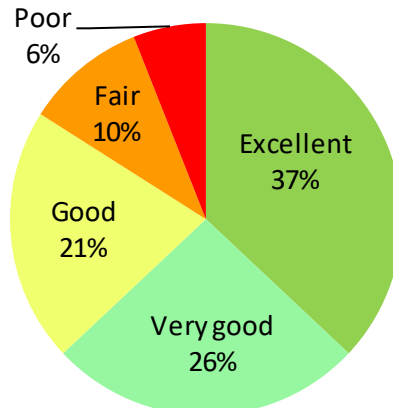


Outdoor maintenance:

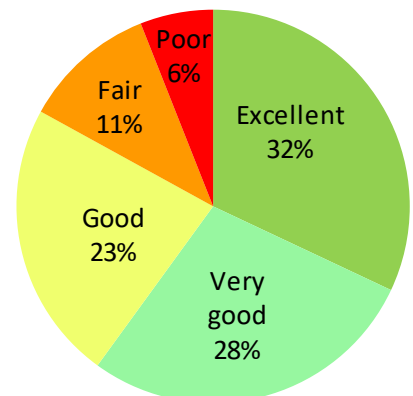
Shelburne Housing Authority



Small LHAs in Western MA



Entire State



- **Heating and Water Problems:** About a fifth of respondents had a problem with their heating and over a third had a plumbing problem in the last 12 months.

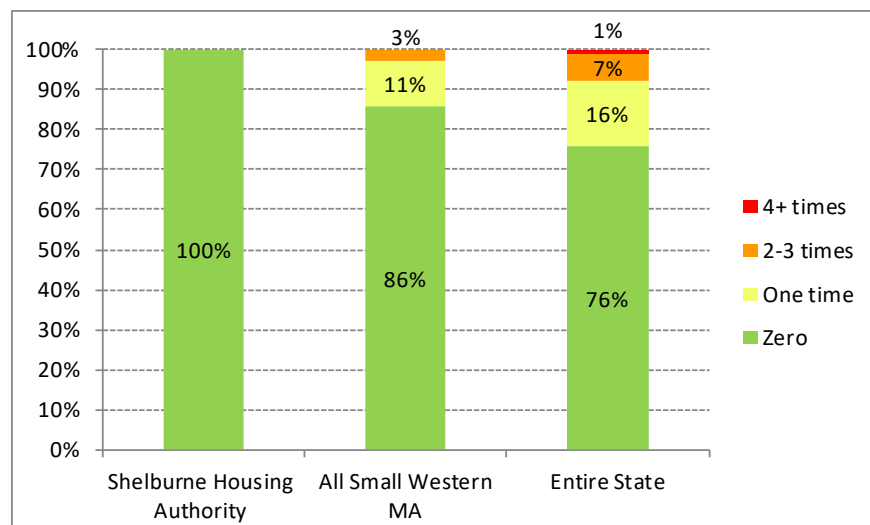
	Shelburne Housing Authority	Small LHAs in Western MA	Entire State
Had any heating problem.....	20%	37%	40%
Had any water problem.....	40%	53%	57%

• Heating Problems

How many times did residents completely lose heat?

The chart below shows how many times respondents had completely lost heat in the last 12 months.

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

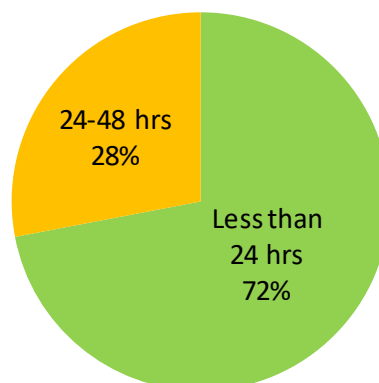


How long did it usually take for heat to come back on? For those respondents who reported completely losing heat, we asked how long it usually took for the heat to come back on – less than 24 hours, 24 - 48 hours, or more than 48 hours.

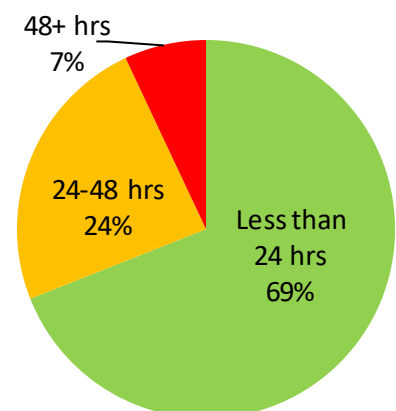
Shelburne Housing Authority

Not Applicable

Small LHAs in Western MA



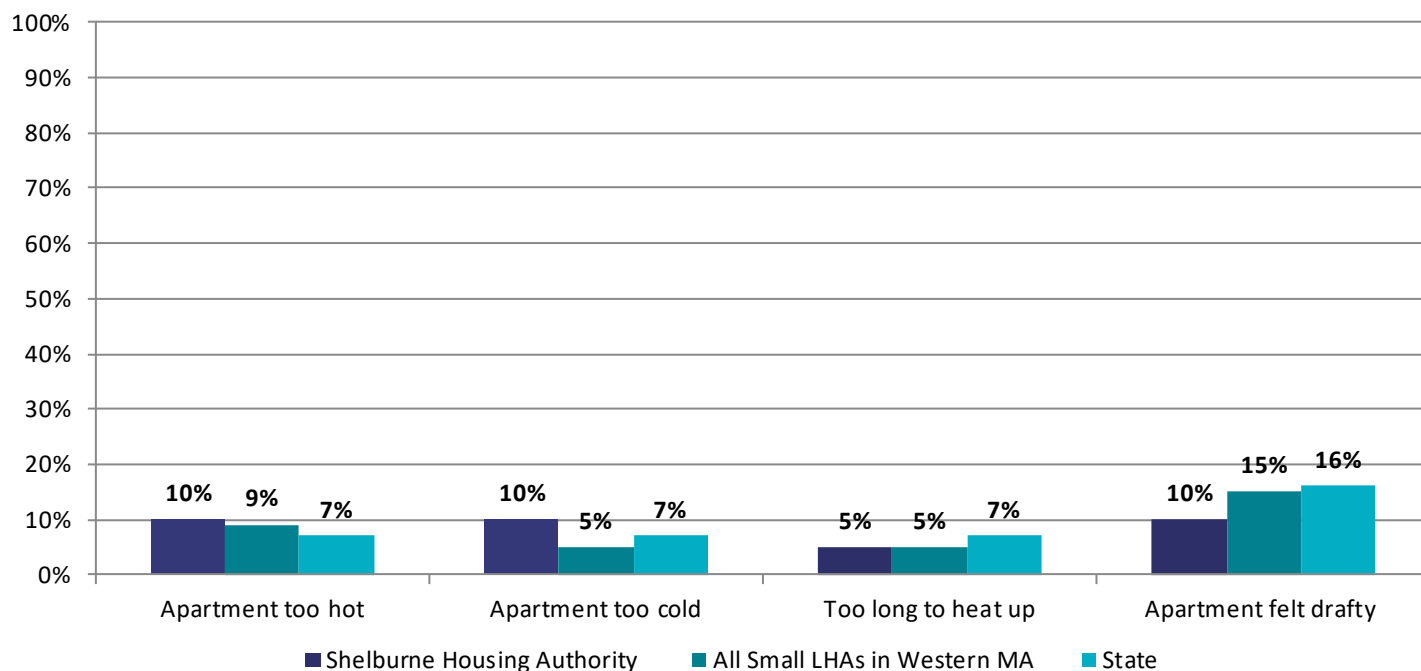
Entire State



- Other Heating Problems

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

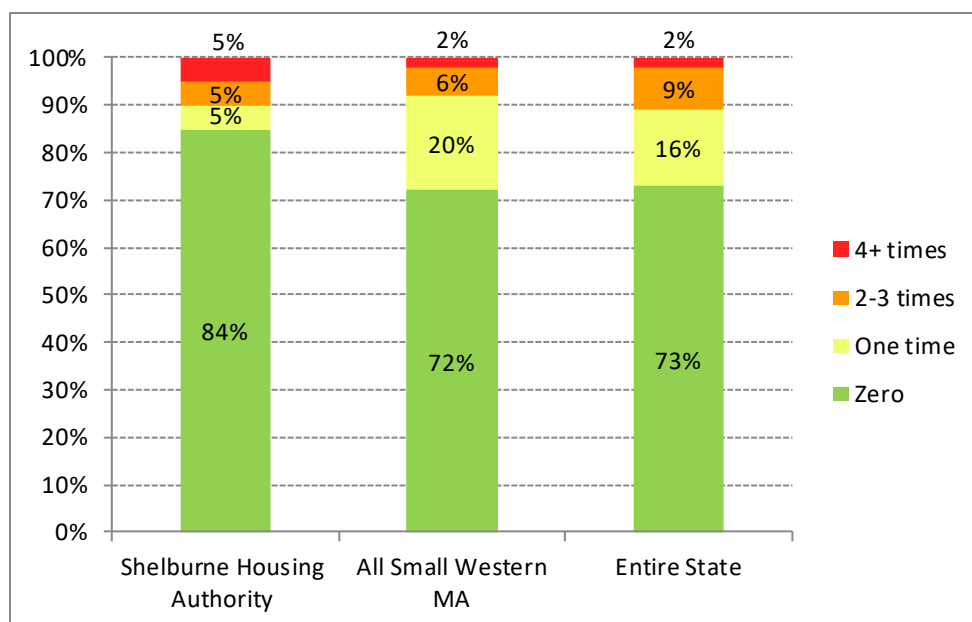
The chart below shows what percentage of residents experienced other heating problems in the last 12 months.



- Water or Plumbing Problems

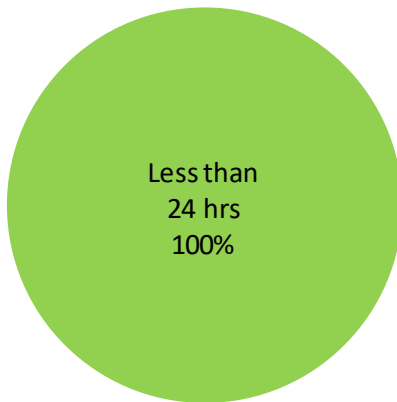
How many times did residents have no hot water in their apartment?

The chart below shows how many times respondents did not have no hot water in their apartment in the last 12 months. The green part of the bars shows what percentage of residents did not have the problem at all. The yellow shows who had the problem one time. The orange shows those who had the problem 2-3 times. And the red shows those who had the problem 4 or more times in the last 12 months.

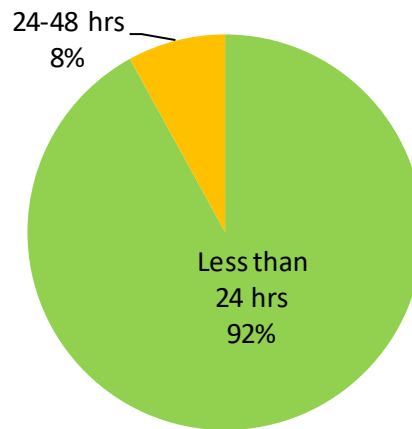


How long did it usually take for hot water to come back on? For those respondents who reported not having hot water in their apartment, we asked how long it usually took for hot water to come back on – less than 24 hours, 24 - 48 hours, or more than 48 hours.

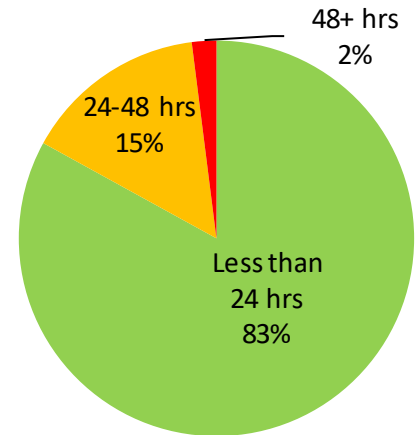
**Shelburne
Housing Authority**



**Small LHAs
in Western MA**



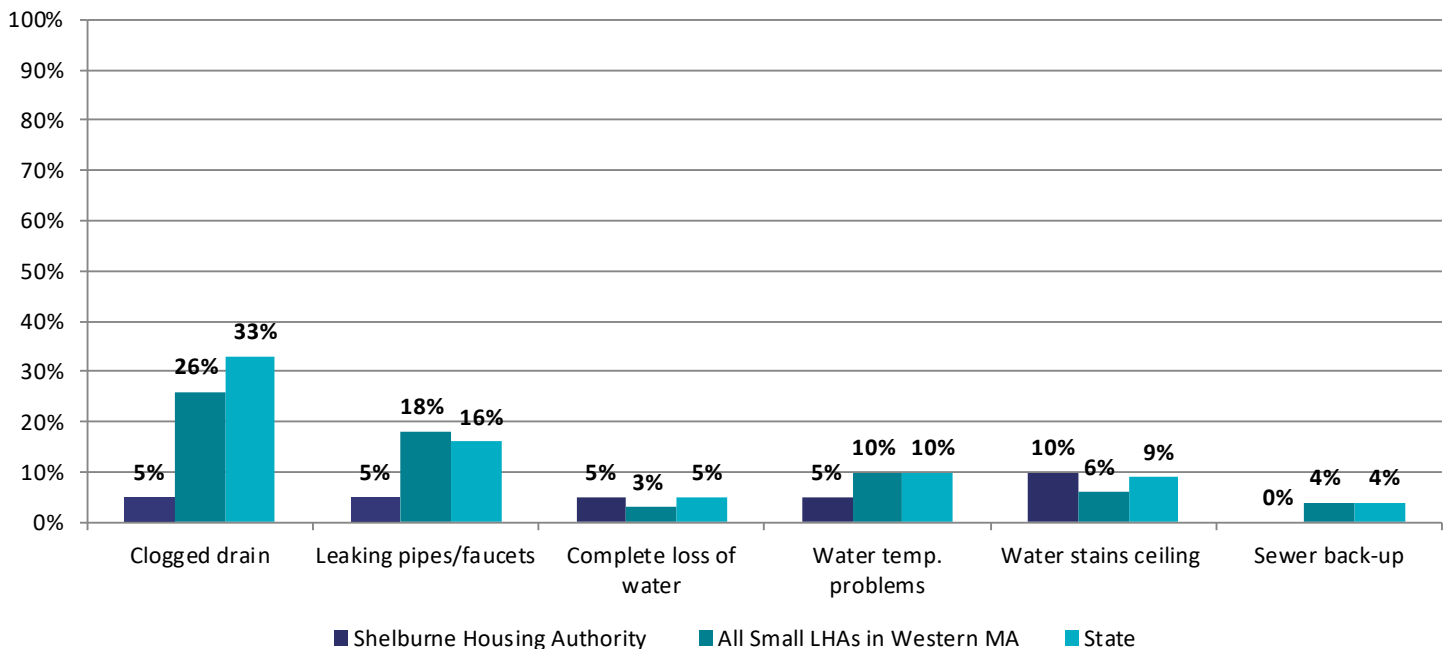
Entire State



• Other Water or Plumbing Problems

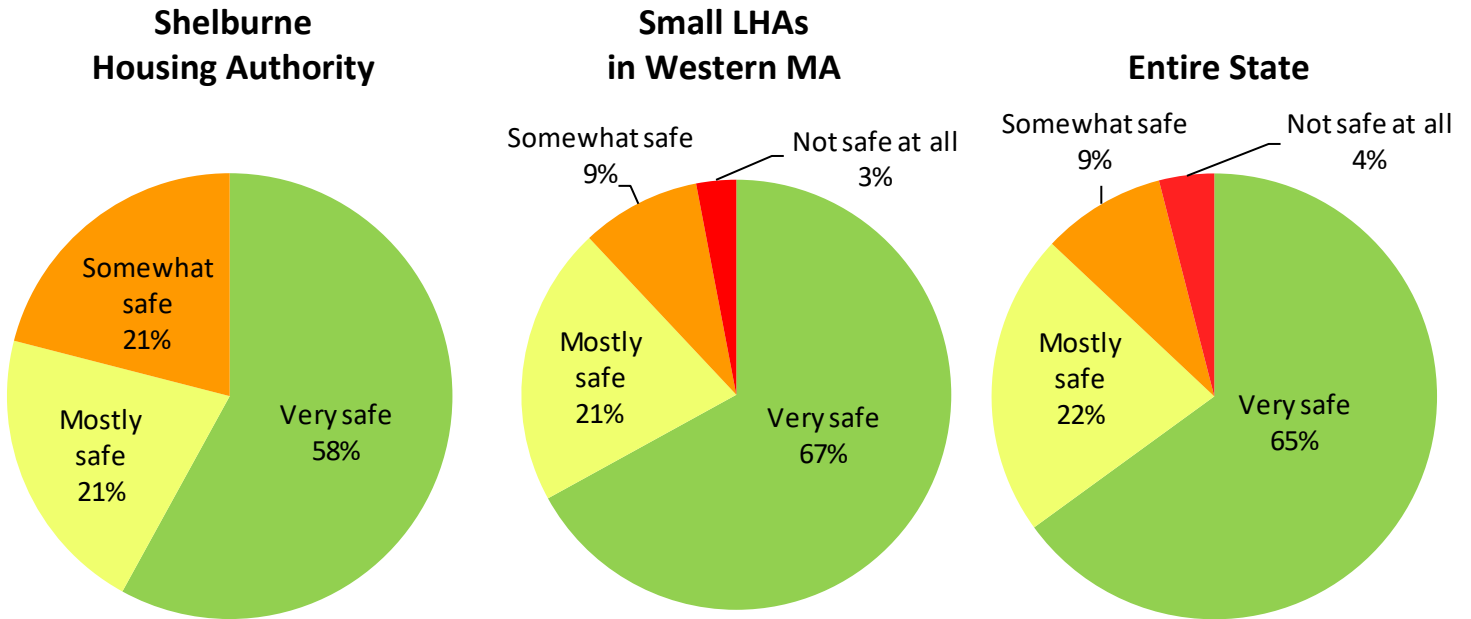
In the last 12 months did residents have other water or plumbing problems?

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

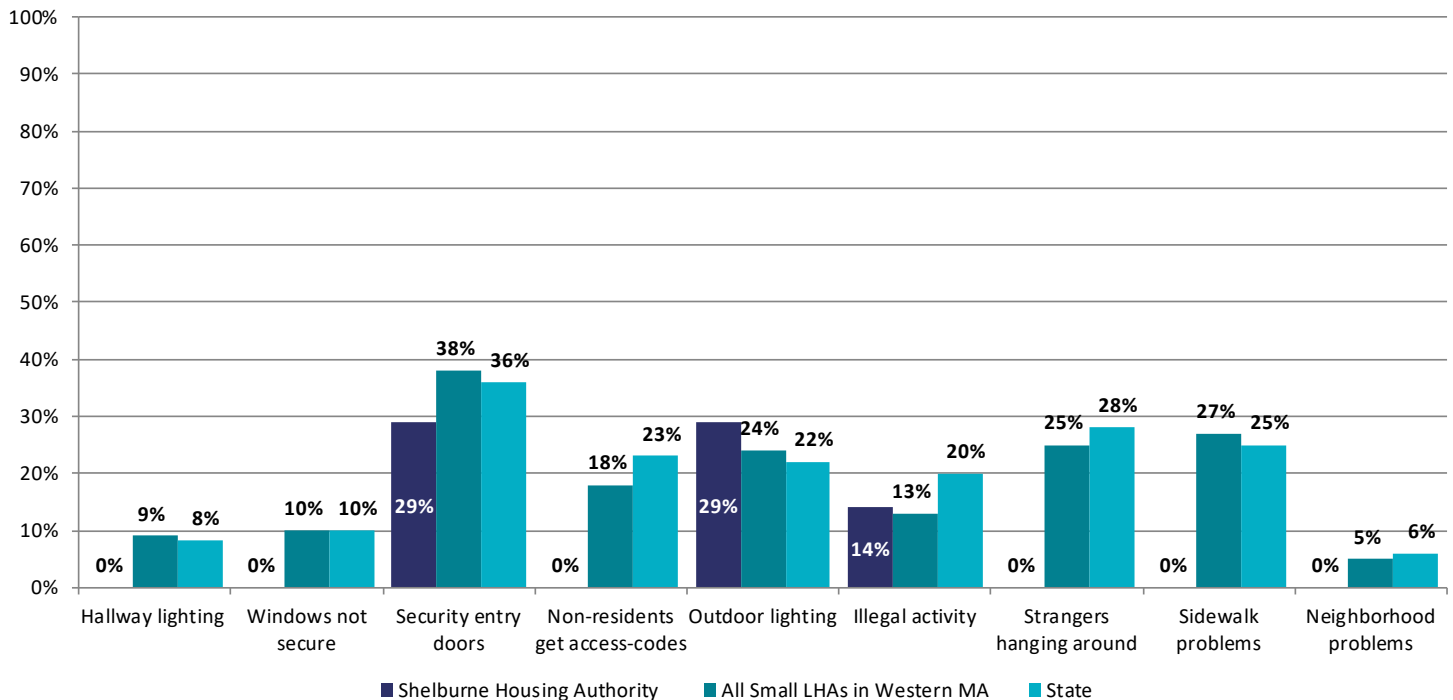


Safety

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



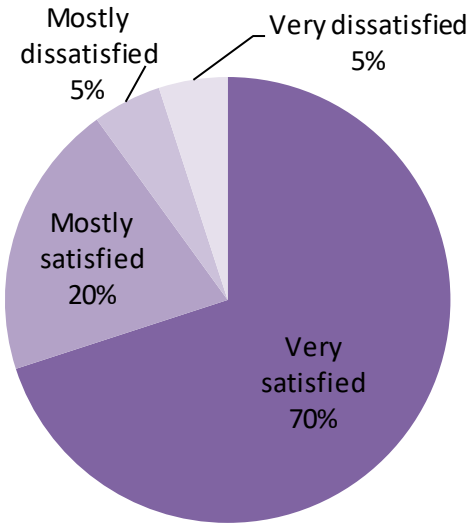
Reasons why respondents felt unsafe in their development: Respondents were asked why they felt unsafe in their development. This chart shows what specific concerns respondents mentioned.



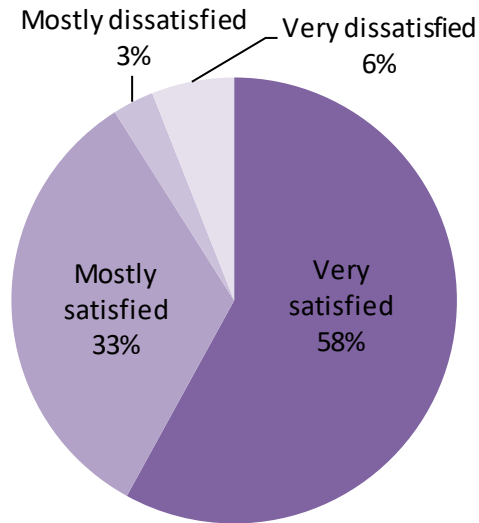
Overall Satisfaction

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

**Shelburne
Housing Authority**



**Small LHAs
in Western MA**



Entire State

