

Sudbury Housing Authority

Performance Management Review (PMR) Report

Fiscal Year End 3/31/2019

*For a detailed report of the Performance Management Review (PMR), please contact the Local Housing Authority

Performance Management Review

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)	
PMR Desk Audit Ratings Summary	
Housing Authority	Sudbury Housing Authority
Fiscal Year Ending	03/31/2019
Housing Management Specialist	Robert Pelletier
Facilities Management Specialist	Wilzor Exantus

Criteria	Score/Rating			
	Management			
	c.667	c.705	c.200	Cumulative
Occupancy Rate	No Findings	No Findings	Not Applicable	No Findings
	c.667	c.705	c.200	Cumulative
Tenant Accounts Receivable (TAR)	No Findings	No Findings	Not Applicable	No Findings
Board Member Training	No Findings			
Certifications and Reporting Submissions	No Findings			
	Financial			
Adjusted Net Income	No Findings			
Operating Reserves	No Findings			

Occupancy

Rating All: No Findings
Rating 667: No Findings
Rating 200: Not Applicable
Rating 705: No Findings

- Enter vacancies into system at least monthly and ensure that there are no duplicates. Reach out to HMS if accidental duplicates occur.
- Use online vacancy system, see user guide if need help. All vacancies must be reported; and quarterly certifications must be completed certifying all data is in system. Request waivers when applicable.
- Follow tenant selection best practices to improve vacancy turnover (pulling lists in CHAMP as soon as vacancy occurs and previewing list to prescreen in advance of vacancies as needed).
- Include unit turnovers in capital improvement plan.
- Engage in a management agreement or contract with private firms to help with heavy unit turnover.
- Review turnovers with staff weekly or biweekly to monitor status of vacant units.
- Develop plan for updating units with long term occupancy to limit turn over time at vacancy; family units may need consistent attentions o when lease up, condition is not affecting vacancy turnover time.
- Ensure that yearly inspection findings are addressed and address tenant damage/lease violations.
- Other:**

Tenant Accounts Receivable (TAR)

Rating All: No Findings
Rating 667: No Findings
Rating 200: Not Applicable
Rating 705: No Findings

- Create or update rent collection policy and procedures and submit to DHCD for review, with supporting Board vote.
- Adhere to your rent collection policy and lease, i.e. sending notices, reminder letters, 14 day notice to quit, 30 day notice etc. Send notices to tenants early and frequently.
- Increase ways to accept rent payment, i.e. check scanners, lock boxes, electronic debit, autopay, etc.
- Report to credit bureau when resident has vacated unit with past due rent balance.
- Consider using small claims court (<https://www.mass.gov/info-details/massachusetts-law-about-small-claims>)
- Create written repayment agreements, either in house or court ordered, and ensure they are adhered to.
- Evaluate vacated balances to better understand what is collectible and what is unlikely to be collected. Don't allow tenant balances to build-up before doing lease enforcement. Review aged receivables report regularly.
- Set reasonable thresholds for commencing legal action.
- Ensure proper documentation of past due balances and collection efforts with tenants.
- Other:**

Certifications and Reporting Submissions

Rating: No Findings

- Submit all four quarterly vacancy certifications by the end of the month following the quarter end.
-
- Submit all four quarters of Tenants Accounts Receivables (TAR) application within 60 days of quarter end.
- Submit all four quarterly operating statements within 60 days of the quarter end.
- Schedule board meetings well in advance. Consider scheduling a backup date to ensure you are able to have your board vote/approval in time to meet reporting deadlines.
-
- Set a recurring appointment in your email calendar for help remembering reporting dates and deadlines.
- Other:**

Adjusted Net Income/Revenue

Rating: No Findings

Revenue:

- Update and adhere to rent collection policy
- Update marketing plan
- Update internal policies related to vacant unit turnover
- Review rent roll to identify outstanding rents and/or patterns of rent delinquency.
- Review operating statements to identify trends in revenue collection such as LHA-wide or development-centered rent issues.
- Follow tenant selection best practices to improve vacancy turnover (pulling lists in CHAMP as soon as vacancy occurs and previewing list to prescreen in advance of vacancies as needed)
- Set up repayment agreements with tenants as soon as tenant becomes in arrears; do not let large balances accrue.
- Make it easier for tenants to pay rent. For example, consider online payments, lockboxes for night time drop-off or extended office hours
- Review budget reports with both fee accountant/financial staff and your board to stay on top of revenue trends.
- Ensure rent determinations are completed regularly and are in adherence with DHCD policy

Expense:

Salaries

- Monitor expenses throughout the year; over or underspending in certain budget lines, can be fixed by reducing or increasing other lines to ensure you stay within your ANUEL.
- Consider a reorganization of staff time/roles and improve processes.
- Hire temporary workers or offer overtime to current employees to pick up the workload of staff out on leave.
- Ensure your budget is in compliance with state and federal requirements regarding allocations.

Legal

- Review and if needed revise tenant selection process, rent collection process and notice to quit process to reduce evictions/legal costs.
- Start tracking or better estimate eviction costs based on historical averages throughout the year. If legal costs for evictions are running higher than expected, reduce other budget lines to ensure you stay within your ANUEL.
- If you qualify, use DHCD's regional attorney program.

Utilities

- Use online resources such as WegoWise, MassEnergyInsight or software provided by your utility company to track and monitor utility usage. Review the usage monthly to look for unusual expenditures.
- Weatherize units to improve insulation. Reach out to maintenance director or DHCD staff for more information.
- Request a referral from your HMS to DHCD's sustainability coordinator if you are interested in saving money through the installation of low-flow toilets, showerheads, LED lights or other cost-savings, energy-efficient measures. DHCD frequently has incentive programs that pay for the procurement and installation of energy and water saving appliances and tools at your LHA.
- Ensure that you have an air conditioner policy that precludes a/c being in windows out of season/enforce policy if already in place.

Maintenance

- Develop or update your preventive maintenance, deferred maintenance and routine maintenance plans and review monthly with maintenance staff.
- Develop or update your procurement and purchasing policies and review with staff.
- Develop a system to schedule and track preventive maintenance, reach out to your facilities management specialist for assistance.
- If contractor costs are high, see if your current maintenance team can complete the work or if it is possible to contract with a tradesman.
- Consider bulk purchasing for supplies and shop around for the best deals.
- Consider investing (through purchase or maintenance) in equipment that may reduce hours spent on maintenance (such as a snow blower to reduce time shoveling).

- Other:**

Operating Reserve

Rating: No Findings

- Please refer to PHN 2018-04 and current budget guidelines for information on operating reserve
- An LHA may spend down to 35% of maximum reserve level without consulting DHCD, but the LHA must budget these expenses in the correct line items of their annual operating budget. If the expense occurred after DHCD approval of the annual operating budget, the LHA should submit a budget revision with these expenditures.
- Any expenditures from the operating reserve that will result in a projected operating reserve of less than 35% of maximum reserve level, requires *prior written approval* from DHCD, *unless the expenses are to resolve health and safety issues*.
- Each LHA must maintain a projected operating reserve of 20% of maximum reserve level, which *remains the minimum operating reserve level for all LHAs*.
- Other:**

Board Member Training

Rating: No Findings

- Ensure you update the board attendance application with the most recent board members, and their term dates.
- Ensure each board member has a unique email for the board member training.
- Provide computer guidance as needed to help board members complete the training.
- Other:**

PMR Capital Benchmarks for LHA Fiscal Year 2019

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD) PMR Fiscal Year 2019	
Criteria	Score/Rating
	Capital
Capital Improvement Plan (CIP) Submitted	No Findings
Capital Spending	Operational Guidance

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)
PMR Physical Condition Ratings**

Housing Authority	Sudbury Housing Authority
Fiscal Year Ending	3/31/2019
Housing Management Specialist	Robert Pelletier
Facilities Management Specialist	Wilzor Exantus

Inspection and Work Order System Criteria	Rating
Inspections	
LHA conducted 100% of the unit inspections.	Corrective Action
Inspections report noted 100% of the necessary repairs in each unit.	No Findings
100% of inspection-related work orders were generated.	Corrective Action
Work order system identifies, tracks, and can produce reports for inspection work orders.	No Findings
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).	Corrective Action
Work Order System	
Emergency work orders defined per PMG, identified, tracked, reportable.	No Findings
Emergency work orders initiated within 24 to 48 hours.	No Findings
Vacancy work orders identified, tracked and reportable.	No Findings
Vacancy work orders were completed within 30 calendar days or if not completed within that timeframe, LHA has a waiver.	No Findings
Comprehensive Preventive Maintenance Program exists & preventive work orders identified, tracked, and reportable.	No Findings
Routine work orders identified, tracked, reportable and completed regularly.	No Findings
Requested work orders are identified, tracked and reportable.	No Findings
Requested work orders were 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 was added and completed in a timely manner as a part of the Deferred Maintenance Plan and/or CIP.	No Findings
LHAs have a 24 hour system for responding to emergencies and have distributed definition of emergency to residents, staff and answering service (if applicable).	No Findings

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD)
PMR Physical Condition Report**

Housing Authority	Sudbury Housing Authority
Fiscal Year Ending	3/31/2019
Housing Management Specialist	Robert Pelletier
Facilities Management Specialist	Wilzor Exantus

Health and Safety Violations. Must be initiated within 24 to 48 hours. If the box below is not checked, you did not have any health and safety violations.

DHCD will provide a list of health and safety violations found. Inspection reports will be provided by your HMS. The health and safety items have an 'X' in the HS column of the inspection report. Actions to correct these violations must be initiated within 24 to 48 hours. When you have completed work orders for these items send documentation to dhcd-phinspectionviolations@massmail.state.ma.us. In the subject line please indicate the LHA Name and the PMR Year. If health and safety violations are not resolved within 60 days, DHCD will follow-up with a second site visit.

Criteria A: LHA conducted 100% of the unit inspections - Corrective Action

- Look to a nearby LHA for help with inspections (formulate a management agreement)
- Attend a Regional DHCD-led Inspection Training (in person)
- Refer to Property Maintenance Guide - Chapter 3 on Inspections See Handout B
- Consider Organization of Staff (see Chapter 4 of PMG) See Handout B
- Develop/Improve internal organizational processes and procedures to ensure you are properly scheduling, tracking, and documenting inspections throughout the year.
- Consider software (web-based applications) or Excel/Access to help you conduct/track/document inspections See Handout H
- Schedule your inspections throughout the year (by development or by anniversary date), rather than once a year
- Hire a qualified contractor (contact the DHCD Compliance Specialist (#617-573-1100 or dhcd-publichousingprocurement@massmail.state.ma.us) for procurement information)

Additional Notes:

SHA should be conducting annual inspections of all units and producing W/O's labeled as Inspection and having work completed within 30 days. SHA should consider spreading out inspections far enough apart to be able to complete all work orders within 30

Criteria B: Inspection report noted 100% of the necessary repairs in each unit - No Findings

- Unable to make recommendations as did not notify tenants of possible inspections
- Attend a Regional DHCD-led Inspection Training (in person)
- Look into maintenance trainings offered by MAHAMS See Handout L
- Include tenant violations in inspection reports
- Review state sanitary code (https://www.mass.gov/files/documents/2016/07/pv/105cmr410_0.pdf)

Additional Notes:

Criteria C: 100% of inspection-related work orders were generated - Corrective Action

- Attend a Regional DHCD-led Inspection Training (in person)
- Refer to Property Maintenance Guide - Chapter 3 on Inspections See Handout B
- Ensure all tenant violations are included in the inspection report and that these violations are followed-up on by administrative staff with the tenant.
- Develop internal organizational processes and procedures to ensure you are properly generating and tracking inspection work orders throughout the year
- Improve internal organizational processes and procedures to ensure you are properly generating and tracking inspection work orders throughout the year
- Consider software (web-based applications) or Excel/Access to help you conduct/generate/track inspections See Handout H

Additional Notes:

SHA should be conducting annual inspections of all units and producing W/O's labeled as Inspection and having work completed within 30 days. SHA should consider spreading out inspections far enough apart to be able to complete all work orders within 30 days. If an inspection work order cannot be completed within 30 days because of backordered parts or some other valid reason, then that work order should be moved to your deferred list.

Work Order System Identifies, Tracks, and Can Produce Reports for the Following

Criteria D: Inspection - No Findings

Criteria F: Emergency (defined per PMG) - No Findings

Criteria H: Vacancy - No Findings

Criteria K: Routine - No Findings

Criteria L: Requested - No Findings

- Consider software (web-based applications) or Excel/Access to help you generate/track/close out work orders See Handout H
- Refer to Property Maintenance Guide - Chapters 1 to 3 on Work Order Systems See Handout B
- Refer to PHN 2016-16 and 2016-36 and 2018-8 on Maintenance Aspects of Performance Management Review See Handout C+D
- Train staff on work order types and how to input them into your work order system/If you use web-based software, reach out to your vendor for training/training materials/changes to the software See Handout K + Software Handouts (M, N, or O) If Applicable
- LHA should align work order types, their priorities and a definition of what is considered an emergency with the Property Maintenance Guide (Pages I-5 to I-10) See Handout B + K
- Look to other LHAs with strong work order systems/processes and procedures around work orders and ask for their assistance
- Definition of Emergency Work Orders Should Be Conditions (no matter the time of day) which are immediately threatening to the life or safety of your residents, staff, or structures. LHA should create emergency list and distribute to staff and tenants. Produce emergency work orders for any work that is on list and initiate work within 24 to 48 hours. See Handout J
- LHA should establish a system of move out inspections for all vacant units. Produce work orders from those move out inspection reports, and list on work order time spent working on turnover, date turnover was started and date finished, list of work done, and material used.

Additional Notes:

Timely Completion of Work Order Types

Criteria E: Inspection - Corrective Action

Criteria G: Emergency - No Findings

Criteria I: Vacancy - No Findings

Criteria M: Requested - No Findings

- Consult DHCD's list of work order types, their priorities and a definition of what is considered an emergency See Handout J + K
- Refer to Property Maintenance Guide - Chapters 1 to 3 on Work Order Systems See Handout B
- Refer to PHNs 2016-16 and 2016-36 and 2018-8 on Maintenance Aspects of Performance Management Review See Handout C + D
- Vacancy turnovers should be completed within 30 calendar days or less. If cannot complete work within 30 days, LHA should contact Housing Management Specialist for a waiver. Use Online Vacancy System to Apply for Waivers (see PHN 2013 - 07) for Waiver Types (if waiver-eligible) See Handout G
- Consider Use of Capital Improvement Plan (CIP) for Capital Projects (see PHN 2012-22 for Capital vs. Operating funds; Contact Your Project Manager or RCAT for More Information) See Handout I
- Hire a qualified contractor (if plan to procure, contact DHCD Compliance Specialist (#617-573-1100 or dhcd-publichousingprocurement@massmail.state.ma.us) for procurement information
- Schedule your inspections throughout the year (by development or by anniversary date), rather than once a year
- Train staff on work order types and how to input them into your work order system/If you use web-based software, reach out to your vendor for training/training materials/changes to the software See Handout K + Software Handouts (M, N or O) If Applicable
- Consider software (web-based applications) or Excel/Access to help you generate/track/close out work orders See Handout H
- Consider Use of a Deferred Maintenance Plan/Operating Funds (Talk to Facilities Management Specialist and/or Housing Management Specialist)
- Look into Maintenance trainings offered by MAHAMS See Handout L
- Look into Dwelling Unit Inspection trainings offered by DHCD
- Look to other LHAs with strong work order systems/processes around work orders and ask for their assistance (possibly formulate a management agreement)
- Request Vacant Unit Funds (see PHN 2016-34 for more information) See Handout F
- Look for other external funding sources
- Build a broader vendor network (to ensure timely delivery of parts/materials)
- Consider Organization of Staff (see Chapter 4 of PMG) See Handout B

Additional Notes:

Emergency Work Order:

Meets DHCD criteria

Vacancy Work Order:

Meets DHCD criteria

Timeliness Requested Work Order:

Meets DHCD criteria

Timeliness of Inspection Work Order:

SHA should be conducting annual inspections of all units and producing W/O's labeled as Inspection and having work completed within 30 days. SHA should consider spreading out inspections far enough apart to be able to complete all work orders within 30 days. If an inspection work order cannot be completed within 30 days because of backordered parts or some other valid reason, then that work order should be moved to your deferred list.

Criteria J: Comprehensive Preventive Maintenance Program Exists + Preventive Work Orders Identified, Tracked, Reportable - *No Findings*

- ☐ Refer to the Property Maintenance Guide (Pages I-23 to I-32 and Pages 8-7 to 8-26) See Handout B
- ☐ Refer to Annual PHNs on this topic, latest of which was PHN 2016-18 "Preventive Maintenance Monthly Reminders" See Handout E
- ☐ Process to schedule, generate, prioritize, and track work orders as a part of the Preventive Maintenance Program (consider using software to automate processes where possible) See Handout H
- ☐ Designate one person with the responsibility of reviewing/updating the Preventive Maintenance Program on a regular basis, as well as in real-time as new equipment is purchased
- ☐ Create a Preventive Maintenance Program/Plan that helps in the upkeep of all buildings and equipment. Work orders should be created and closed for all items on Preventive Maintenance Plan; Consult the Property Maintenance Guide (Pages I-23 to I-32) and Public Housing Notices 2016 - 18 "Preventive Maintenance Reminders" for how to develop a Preventive Maintenance Program See Handout B
- ☐ Consider software (web-based applications) or Excel/Access to help you generate/track/close out work orders See Handout H
- ☐ Refer to Property Maintenance Guide - Chapters 1 to 3 on Work Order Systems See Handout B
- ☐ Refer to PHN 2016-16 and 2016-36 and 2018-8 on Maintenance Aspects of Performance Management Review See Handout C+D
- ☐ Train staff on work order types and how to input them into your work order system/If you use web-based software, reach out to your vendor for training/training materials/changes to the software See Handout K + Software Handouts (M, N, or O) If Applicable
- ☐ Look to other LHAs with strong work order systems/processes and procedures around work orders and ask for their assistance

Additional Notes:

Criteria N: 24 Emergency Response System, Distributed Emergency Definition to Residents, Staff, and Answering Service (if applicable) - *No Findings*

- ☐ Create an Emergency System that Is Available 24 Hours a Day (if plan to procure, contact DHCD Compliance Specialist (#617-573-1100 or dhcd-publichousingprocurement@massmail.state.ma.us))
- ☐ Refer to Property Maintenance Guide (Pages I-5 to I-10) on Emergencies and System Setup See Handout B
- ☐ LHA should create a list of emergency items and distribute to all staff, tenants and answering service if have one. Produce emergency work orders for any work that is on your emergency list and initiate work within 24 to 48 hours. See Handout J

Additional Notes:

SUDBURY HOUSING AUTHORITY

55 HUDSON ROAD
SUDBURY, MASSACHUSETTS 01776
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Executive Director

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August 27, 2019

To: Bob Pelletier, HMS

From: Sheila Cusolito, ED

Re: FYE19 PMR Publishing Year Response

As a result of legislative changes enacted by the signing of Chapter 235, The Acts of 2014, housing authorities now participate in a series of performance assessments designed to strengthen operations and ensure compliance. The Department of Housing and Community Development (DHCD) is tasked with addressing necessary regulatory changes, providing guidance to housing authorities, and evaluating housing authority performance.

Notwithstanding the value of both enhanced performance metrics and improved oversight by the DHCD, the mandated changes mask a root cause of performance shortfalls: antiquated staffing models that predate the mandates. To a significant extent, Chapter 235 represents an unfunded mandate that emphasizes administrative reporting and record-keeping changes for those housing authorities, like Sudbury, that are historically high performing.

The results from the third annual PMR highlight this point. The SHA is pleased to note its continued strong performance in the areas of Occupancy Rate; Tenants Accounts Receivables; Board Member Training; Certifications and Reporting; Adjusted Net Income; Operating Reserves; and Capital Plan Submission and, notwithstanding findings relative to maintenance inspections and work orders, is pleased with its performance in these areas as well.

At the root of the findings in maintenance is staffing: the SHA was understaffed in maintenance for the entire period represented by the review. This exacerbated the already increased administrative burden associated with the new mandates, for both administrative and maintenance staff. The two corrective actions related to inspections derive from postponing one inspection at the request of a resident who was ill, then failing to reschedule. What the finding masks is that the SHA completed nearly 800 other work orders, excluding capital projects and supervision of contracted work during this period of understaffing. There is no recent record of the SHA failing to perform 100% of its annual inspections; in fact, until the promulgation of the new requirements, the SHA inspected its

units more frequently than required. Moreover, the SHA continues to more frequently inspect the units of tenants-at-risk, again despite the increased burdens on staff relating to the Chapter 235 mandates.

The SHA also received a corrective action for incorrectly logging an *intentionally deferred* work order—a clerical error representing less than 0.1% of the total of work orders processed correctly during the review period. The review metric places the weight on the administrative aspect of this incorrectly categorized work order, masking both the intent and the actual completion of the work.

With respect to its three-year capital spending, there are three significant factors that affected the SHA's performance. As a function of project costs, housing authorities are connected to a team of others—DHCD project and construction managers; DHCD-approved architects or engineers; the Regional Capital Assistance Team (RCAT); contractors and subcontractors—that must work together to see a project to completion. In this sense, a failure to meet the capital spending benchmark is a shared failure.

First, the failure to meet the capital spending benchmark belies the fact that during the audited time-frame, the SHA completed projects totaling over \$400,000 utilizing both sustainability and Community Preservation Act funds. Such funds are *not* utilized in the benchmark metric. Within the audit period, these projects were closed successfully, as were numerous other Formula Funding projects overseen exclusively by SHA staff. It would be unfortunate if small LHAs with limited staff capacity interpret the benchmark criteria as a disincentive to seeking competitive funding to augment its Formula Funding.

Second, the SHA is fortunate to have excellent reserves, a portion of which were historically earmarked for non-routine maintenance. It incurred out-of-pocket costs on one project that went out to bid significantly under-estimated for cost. Because the SHA had budgeted reserves to extraordinary maintenance, the DHCD initially required the reserve funds to be utilized. The SHA requested a recategorization to Formula Funding when it became clear that it would not meet its benchmark. Although the DHCD initially approved this request, a delay in processing expenses and an eleventh-hour reversal of its decision to cover costs through Formula Funding contributed to the net shortfall in capital spending during this review period. It would be unfortunate if the SHA determines it is not in its best interest to allocate resources to non-routine maintenance, solely as a strategy to ensure that its capital spending benchmark is attained.

Third, during this audit period, the SHA experienced project delays beyond its direct control, primarily related to project management by third-party collaterals; a need to re-bid; and, at the request of the SHA, a demand for a contractor to re-execute work in order to ensure the SHA's assets were protected. The SHA also committed a significant portion of its Formula Funding to a major utility project at its c. 667 development. This project has been delayed for two years for reasons entirely outside of what the SHA can control. It would have been irresponsible of the SHA to accept substandard contractor work or to divert the funds dedicated to the utility project in order to meet the near-term spending benchmark.

The SHA remains committed to its own high standard of performance, including staff training and enhanced communication with the DHCD. In hopes of mitigating the insufficiency of current, approved staffing models, the SHA has proactively requested DHCD approval of a reconfiguration of staff that will better meet both the current performance requirements and the needs of its residents. The SHA looks forward to an affirmative response and a continued partnership with the DHCD to meet both the PMR and other newly implemented performance requirements.