



**Groveland Housing Authority**  
**10 River Pines Road**  
**Groveland, MA 01834**  
**Phone 978-374-0370 • Fax 978-374-7621**

October 16, 2018

Marilyn B. O'Sullivan, Director  
HUD Office of Public Housing  
10 Causeway Street  
Boston, MA 02222-1092

Re: MA132 CAP Outstanding Items

Dear Ms. O'Sullivan:

I wanted to respond to your letter of October 9, 2018 to address the issues that you raised. You state that there are three outstanding issues from the corrective action plan. This is three of nineteen items in the plan. Sixteen of the items have been closed out by your office.

You listed item #4 which is the capital needs assessment. The question states, "GHA shall undertake or procure a full Physical Needs Assessment. Utilizing that assessment, GHA shall create a long term maintenance plan that will ensure the physical condition of the property into the future." The GHA has complied with procuring this item. The contractor has started by submitting HUD 91130 Building Code Certification to the building inspector. AEI Consultants, Inc. is in receipt of a signed contract and is in the process of scheduling a survey of the property.

Another item is #10 is the summary of training completed. "The GHA should submit a summary of training completed by GHA staff and board members, etc." There was no requirement to complete Lead the Way here. The board is willing to do this, but in the letter of the corrective action plan, it was not required.

Items 4 and 10 should be closed out because we complied with the instructions in the plan. We can revisit those issues in another context if you wish.

Item #7 which is the approved management agreement admittedly is not complete but the approval of this item rested on many different things which we have been addressing one-by-one. The new DHCD guidance on management agreements states that we will need to file a work plan to address any issues raised which may delay approval of the contract. Some issues were raised in the last AUP (Agreed Upon Procedures) audit. Another issue is that we need to conduct a follow up AUP audit for the state program. This needs to be procured and will complete all of the requirements before the end of the year.

Other issues:

A REAC inspection in 2016 in which we fared poorly was listed in your letter. This has been corrected as evidenced by our improved score this year.

Drinking water quality was reportedly poor. This issue may have been new to some at HUD but the housing authority hired an engineering firm in 2015 to report on the water quality and what steps we could take to improve it. The report was provided to residents, the town water department and staff at HUD. The Groveland water issue is town-wide and has been reported in newspapers and on television. The GHA would never knowingly expose residents to risk.

A violation of the National Environmental Protection Act happened and a corrective action was required. We are working on complying with this but there are many individuals who need to take action and it is taking longer than we anticipated. This will be completed in the near future. Given the nature of the violation, which was failure to advertise public notice for a gutter replacement project, we do not believe forfeiture of capital funds is warranted.

For the 2014 – 2016 Capital Fund Close Out, there was some confusion as to whether this needed to be done through EPIC or with paper forms. We have obtained guidance from the department and will close this out soon.

The e-mail account for the Executive Director has been problematic for quite some time. Several calls were made to the vendor that hosts the e-mail, PHA Web, and each time the performance would improve for a while but then drop off again. We had our IT vendor, Tech-n-Go, look at the issue and they did some maintenance which also worked for a while but then reverted to the same problems. We have migrated to Office.com for our e-mail. This was a process that took several weeks as we were having our IT vendor set up our account with a third party vendor. We do not anticipate any more problems.

The GHA is working on developing the five-year plan. It was hoped that our PNA would be completed before filing this in case the survey turned up any pressing physical needs. However, we will move forward with this and get our filing in promptly.

Board meetings have been held in the Director's Office which serves a dual purpose as a conference room. The open meeting law, which is enforced by the state attorney general's office, requires that there be adequate space for assembled members of the public. We are in compliance with the law as there is adequate space but in the interest of consensus between the board and our partners, we will hold meetings in the community room in the future when possible.

The freezing of the operating subsidy account will affect operations to some degree but without clarification on how this works, we cannot plan for this action. We need to know how this process works, how long it will last and what steps we need to take to return to normal operating procedure. We do not have any financial issues so it is unclear why this action was taken.

We appreciate your inclusion of copies of correspondence but these issues were dealt with as they arose as were most of the issues you listed. We are a small agency with limited capacity and we do not ignore our obligations. We have and will continue to work with HUD and DHCD to address any and all

concerns. We stand committed to adhere to the mission statement and policies in order to provide safe, decent and affordable housing to our residents.

We appreciate that you share our desire to succeed in complying with the requirements.

Sincerely,

A handwritten signature in blue ink that reads "Kathleen M. Prunier". The signature is written in a cursive style with a large initial 'K'.

Kathleen M. Prunier  
Chairwoman