



New England

U.S. Department of Housing and Urban Development

Office of Public Housing
Boston Hub
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

Mr. Joseph Hart
Executive Director
Groveland Housing Authority
10 River Pines Road
Groveland, MA 01834

MAY - 4 2017

Re: Corrective Action Plan (CAP)

Dear Mr. Hart:

As part of the United States Department of Housing and Urban Development's (HUD) efforts to provide technical assistance to housing agencies, the Boston Field Office staff visited the Groveland Housing Authority (GHA) on April 4, 2017. The visit provided an opportunity for HUD to meet with PHA staff, discuss performance assessed under the Public Housing Assessment System (PHAS) and determine areas that need attention.

As you know this office issued a Take Action Letter to your agency on January 13, 2017 as a result of the Public Housing Assessment System (PHAS) score issued to GHA by the Real Estate Assessment Center (REAC) in December of 2016. The authority was designated substandard in the physical indicator for the period ending June 30, 2016. The Take Action Letter required that the GHA propose a recovery plan. Executive Director Joseph Hart responded in writing to our office on behalf of the Board of Commissioners with some details and plans for improvements designed to address issues causing the poor physical inspection results that took place at the fifty-eight (58) unit River Pines federal public housing development on May 27, 2016.

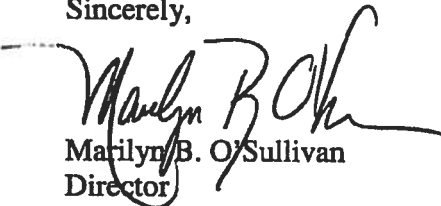
The improvement plan submitted in February of 2017 was not comprehensive and does not detail all items that were cited in the inspections. In addition, it does not present a timeline for completion of all actions and does not address the root causes of repeated conditions that contributed to less than adequate scores for the physical indicator. If the GHA does not identify the sources of the performance deficiencies and identify solutions to address the underlying issues it will be difficult to achieve an acceptable score and sustain that performance moving forward.

This purpose of this letter is to transmit a proposed Corrective Action Plan (CAP) for the review of the Board of Commissioners and the Executive Director. The enclosed CAP is a binding contract that delineates performance outcomes, timelines, and reporting requirements that must be strictly adhered to. It also specifies

suggested remedies to achieve agreed-upon levels of performance. If the GHA wishes to add items to the proposed plan or wishes to propose alternative dates we ask that you contact our office to discuss the proposed amendments. If items can be addressed earlier than proposed feel free to submit documentation with the monthly reports that addresses the specific item. Your first periodic report must be received by HUD no later than May 31, 2017. Subsequent to that we ask that the GHA report monthly by the last day of the month. Reports shall be submitted electronically. If the GHA agrees to the CAP items and dates with no proposed changes, return a scanned copy of the CAP Monthly Progress Report Page with your signature. Upon execution by this office a copy will be forwarded to you for your records.

We look forward to working with the Housing Authority of the Town of Groveland to recover from the substandard designation and achieve sustainable performance. If you have any questions about the Action Plan, please contact my office. Thank you for your ongoing assistance in this matter.

Sincerely,



Marilyn B. O'Sullivan
Director

Enclosure

cc: William F. Dunn, Chairman, Board of Selectman, Town of Groveland
Kathleen Prunier, Chairperson, GHA Board of Commissioners
Linda Anderson, Commissioner, Groveland Housing Authority
Valerie Osborne, Commissioner, Groveland Housing Authority
Elaine Davey, Commissioner, Groveland Housing Authority
Elizabeth Gorski, Commissioner, Groveland Housing Authority

Corrective Action Plan (CAP)

US Department of Housing and Urban Development

Office of Public and Indian Housing

Monthly Progress Report

PHA Name: Groveland Housing Authority

CAP Term: 5/5/17-6/30/2018

CORRECTIVE ACTION PLAN
Groveland Housing Authority

The following constitutes an agreement between the signatories of this Corrective Action Plan to proceed in good faith and in a mutually cooperative effort to bring the listed Tasks to completion by an agreed upon completion date by the listed responsible staff person.

Signature

Signature

Date

Date

Director
Boston HUD Office

Groveland Housing Authority

ACTION PLAN
GROVELAND HOUSING AUTHORITY AND THE U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
MAY 2017

Item #	Results and Determinations from Assessment	Desired Outcome	Target Accomplish Date	Actual Accomplish Date	Remedies	Comments / Accomplishments
AREA: Physical Condition						
#1	The Groveland Housing Authority is to create a plan which will ensure significant improvement in REAC inspection scores moving forward	GHA shall provide the Boston Field Office with evidence (completed work order or work order log) that all deficiencies noted in the 5/27/16 inspection have been corrected. For any deficiencies not yet corrected, provide a narrative of why not and when it will be corrected.	6/30/2017			
#2		GHA shall undertake a Capital Planning review which results in the creation of a 5 Year Capital Action Plan (HUD-50075.2) to address current physical needs of the property.	With 2017 CFP Funding (estimated date: 6/30/2017)			
#3		GHA shall investigate the use of an outside party (independent contractor, other PHA staff, etc.) to perform unit inspections in lieu of the regular maintenance staff to ensure all units receive a thorough and unbiased inspection	12/31/2017			
#4		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.	9/30/2017			
#5		Currently, the GHA performs unit inspections all at one time, usually during November. It is recommended that that GHA change the timing of the inspections to better align with the expected timing of REAC inspections in efforts to maximize the score achieved.	12/30/2017			

Item #	Results and Determinations from Assessment	Desired Outcome	Target Accomplish Date	Actual Accomplish Date	Remedies	Comments / Accomplishments
#6		The composition of GH-A's buildings and units require revisions in PIC. When provided with the list documenting the necessary changes the GH-A must work with staff in this office to ensure that both dwelling and nondwelling buildings are properly identified in PIC.	6/30/2017			
PHAS Management						
#7	The Groveland Housing Authority is to implement a plan to improve its PHAS Management score and ensure long-term sustainability at an acceptable level of performance.	The GH-A must submit a copy of an executed Management Agreement between the HH-A and the GH-A. Such agreement must define responsibilities associated with the federal program, the compensation provided for management of the federal property as well as a workplan that includes the federal property. It is requested that the agreement provide for a formal evaluation of the management agent's performance by the board.	6/30/2017			
#8		The GH-A should submit a Personnel Policy adopted by the Board of Commissioners. The Policy should provide for annual performance evaluations for staff. It is requested that the submission also be accompanied by position descriptions for all staff that have assigned responsibilities for management of the federal program. Notation in the CAP should indicate that all materials have been shared with applicable staff.	7/31/2017			

Item #	Results and Determinations from Assessment	Desired Outcome	Target Accomplish Date	Actual Accomplish Date	Remedies	Comments / Accomplishments
#9		The GH/A must develop a series of performance reports regarding the federal program that are shared with board members at each monthly board meeting. It is recommended that such reports possibly include year to date financial statements with comparisons of budgeted and actual revenue and expenses.	8/30/2017			
#10		The GH/A should submit a summary of training completed by GH/A staff and board members. Summary should include the names of those that have completed HUD's "Leading the Way" as well as any training required by the Department of Housing and Community Development.	8/31/2017			
#11		The GH/A must submit its PHA Plan certifications with evidence of advertisement and public hearing with information about its Resident Advisory Board. The certification was due to HUD 75 days prior to the beginning of the fiscal year. Submission is to be preceded by a public hearing. It is recommended that the public process for the GH/A 2017 Capital Fund Program (CFP) budget be accomplished with the same hearing.	8/30/2017			
#12		The GH/A must revise its Admissions and Continued Occupancy Policy for the federal public housing program to ensure that it reflects proper and current regulations and discretionary policies of the GH/A.	8/31/2017			

Item #	Results and Determinations from Assessment	Desired Outcome	Target Accomplish Date	Actual Accomplish Date	Remedies	Comments / Accomplishments
#13		The GHA must submit a Community Service Policy and board vote approving such to the HUD Office. The GHA must ensure that it is obtaining proper certifications and documentation to support residents that may be exempt from CSSR requirements. All exempt individuals must also be reflected appropriately in PIC.	7/31/2017			
#14		Correct the GHA website and PIC to reflect the current staff and board of commissioner members at your agency. Please also ensure that all meetings minutes are posted as they occur and continue to provide additional information about the agency to the general public.	5/31/2017			
#15		It is recommended that GHA implement a written internal control procedure that defines the separation of duties and assists in safeguarding your agency against fraud. The fee accountant may have samples that could be appropriate for the agency. Please submit the policy and board vote to this office.	8/31/2017			HUD staff have provided samples for your review and consideration
#16		Provide the flat rent schedule and board vote for such to the HUD office.	6/30/2017			
#17		Provide copies of the General Depository Agreement for your agency that stipulates where federal funds are deposited.	5/31/2017			The GHA has been provided with instructions for followup on this item.
#18		Submit the Reasonable Accommodation Policy and the Grievance Policy with board votes approving such to the HUD office.	7/31/2017			

Item #	Results and Determinations from Assessment	Desired Outcome	Target Accomplish Date	Actual Accomplish Date	Remedies	Comments / Accomplishments
#19		The GHJA should provide its residents with information about the ability to form a resident council. They may contact other PHJAs for contact information about active resident organizations and the GHJA can contact the HUD Office for regulations and pertinent notices to assist in this regard.	8/30/2017			