



**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

Ms. Kathleen Prunier, Chair  
Board of Commissioners  
Groveland Housing Authority  
7 Harvard Road  
Groveland, MA 01834

**OCT - 9 2018**

Dear Ms. Prunier:

This is in response to the Groveland Housing Authority's (GHA) submission of its required monthly Corrective Action Plan (CAP) report on September 4, 2018. As you know the CAP, executed between the United States Department of Housing and Urban Development (HUD) and the GHA had an expiration date of August 31, 2018 with a sixty-day extension having been approved by this office on June 8, 2018. The GHA Managing Director Joseph Hart requested that this office officially close the CAP.

At this time, we cannot close the CAP due three items that require further attention. We are taking this opportunity to advise you and other interested parties about concerns that our office has relative to a number of issues that relate to the management of the federal public housing program in Groveland. The GHA and its board have been advised in writing regarding some of these concerns and others in writing previously. Items that are of concern at this particular time are detailed below:

- Item #7 in the CAP requires the submission of an executed Management Agreement for the management of the Groveland Housing Authority approved by the Massachusetts Office of Housing and Community Development (DHCD). The GHA has provided this office with a copy of a proposed Management Agreement submitted to DHCD. Due to the failure of your agency to address items set forth by DHCD in a letter to the GHA dated July 13, 2018, DHCD has not acted upon the agreement. Until such time as the Agreement is approved, this item will remain open in the CAP.
- Item #4 in the CAP requires that the GHA undertake or procure a full Physical Needs Assessment and create a long-term maintenance plan that will ensure the physical condition of the federal property in the future. The GHA has advised this office that it had advertised and selected a firm responsible for completing a Physical Needs Assessment and Energy Audit. The firm was informed of the selection on August 29, 2018. Until such time as the PNA is completed and the GHA utilizes that document to create a long-term capital plan this item in the will remain open in the CAP.
- Item #10 in the CAP requires that the GHA submit a summary of training completed by GHA staff and board members. The summary should include the names of those that have completed HUD's "Lead the Way" training as well as training required by DHCD. The GHA has advised that board members had completed the mandatory DHCD required training and one staff member that works with the GHA and its residents has completed the HUD Lead the Way training. None of the board members or the Managing Director have completed the HUD training. During our visit to the board of commissioners meeting at your agency on March 22, 2018 HUD strongly

encouraged the completion of this training as an educational tool for you and the board members. This item will remain open in the CAP.

- More than routine contact began with the GHA your agency after a physical inspection of the River Pines property by staff from the HUD Real Estate Assessment Center (REAC) on June 2, 2016 resulted in a physical score of 55 of 100 points. The GHA was designated a substandard physical performer under the Public Housing Assessment System (PHAS) for the period ending June 30, 2016. A Take Action Letter was issued to your agency on January 13, 2017. After a site visit on April 4, 2017 the CAP was executed with the first monthly report submitted for the period ending May 31, 2017. Please be advised that an inspection of the River Pines development was conducted by REAC on September 12, 2018. A score of 76 was assigned to the property.
- The GHA was notified via letter from this office dated January 19<sup>th</sup>, 2018 that potentially troubling conditions regarding the GHA's drinking water was reported to this office and that GHA was to complete a drinking water quality test and forward the results within 30 days. The GHA responded via email 10 days later requesting additional information as to what testing was required and where it could be procured. This office responded the same day advising actions to take. The GHA then waited another 21 days before collecting and delivering the sample for analysis which in turn meant that results of the analysis were not available until March 15<sup>th</sup>, or 25 days after the stated deadline. While some of this delay was out of GHA's control (due to failed equipment at the selected lab), GHA's slow response to this issue would have exposed residents to unnecessary risk had the testing results been different.
- The GHA was notified via letter from this office dated June 28, 2018 that it had violated the National Environmental Protection Act. This violation has compromised the 2017 CFP Grant of \$61,915. Forfeiture of such funds would be of great detriment to the residents at the development. The GHA was given a 90-day timeline to complete required corrective actions and was reminded via email when that deadline was 21 days away. The GHA has failed to complete any of the required corrective actions and waited until the day before the deadline to request an extension while providing no evidence of good faith progress being made. HUD is not granting any further extensions and may seek recapture of these funds.
- The GHA has failed to submit proper documentation to close its 2014-2016 Capital Fund Program (CFP) Grants despite multiple requests from this office.
- The GHA has been informed numerous times over the last two years that the Executive Director email address provided to this office and used by all HUD systems is 'full' and unable to receive messages. To date, this situation has not been resolved and as such GHA may not be receiving important communications from HUD. Additionally, this situation results in email communication between this office and the GHA occurring via an account belonging to Haverhill Housing Authority and therefore would be unavailable to a new Executive Director or Management Agent should that situation arise.
- The GHA has not submitted a 5 Year Capital Plan or Annual Budget in EPIC, nor has it submitted the required certifications despite multiple requests from this office. Failure to submit jeopardizes the 2018 CFP grant funds and is reducing the timeline for proper obligation and expenditure of these funds.
- This office has been informed that board meetings continue to be held in the Executive Director's private office. Our office has discussed this issue with both yourself and the board chair and has

also reduced to writing a recommendation that the meetings be held in the community room or another room conducive to appropriate public participation. This is unacceptable.

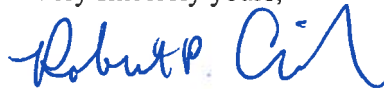
- This office has placed a zero threshold on the GHA's receipt of public housing operating funds. This means that in order to receive HUD operating funds the GHA must petition this office with appropriate backup documentation.

Enclosed are copies of correspondence that has been sent directly or copied to board members since January 13, 2017. These materials relate to the CAP, contact from residents, Congressional correspondence, concerns raised by employees and compliance with the regulations. HUD experience with agencies that are substandard or troubled has revealed that in many cases problems stem from areas related to finance and governance. This letter is to once again memorialize HUD efforts to obtain cooperation and compliance in the management of a fifty-eight (58) unit complex in the community.

Please be advised that continued or repeated failure by the Groveland Housing Authority to comply with HUD requirements and its Annual Contributions Contract under the United States Housing Act of 1937, as amended, may result in a more formal Recovery Plan with the Department which would involve state and local elected and appointed officials with public participation. This office expects to make a referral of a review of the GHA to HUD's Departmental Enforcement Center, which may seek any remedies, including, without limitation, Limited Denial of Participation, debarment, suspension, contraction of operation activities, consolidation, receivership, and delivery of possession and control of projects to HUD. In addition, we have been in communication with DHCD regarding ongoing nonperformance issues at the GHA.

If there are questions regarding this matter you may contact me at [marilyn.b.osullivan@hud.gov](mailto:marilyn.b.osullivan@hud.gov) or (617) 994-8420.

Very sincerely yours,



Marilyn B. O'Sullivan  
Director

Enc.

cc:

Joseph Hart, Managing Director, Groveland Housing Authority  
Inger Burke, Commissioner, Groveland Housing Authority  
Elaine Davey, Commissioner, Groveland Housing Authority  
Elizabeth Gorski, Commissioner, Groveland Housing Authority  
Valerie Osbourne, Commissioner, Groveland Housing Authority  
Robert Driscoll, Chair, Board of Commissioners, Haverhill Housing Authority  
Mr. William O'Neil, Chair, Board of Selectman, Town of Groveland