

NYCHA Compliance Department:
14th Assessment of Compliance with Requirements of
Paragraphs 8 to 15 of Exhibit A to the January 31, 2019 Agreement
Between NYCHA, HUD, SDNY and the City of New York
Covering Period of June 1, 2025 to November 30, 2025

I. Summary of Compliance in January 2026 Publication	1
II. Introduction and Methodology	4
III. Updates from EHS	5
IV. Programmatic Updates.....	5
V. Assessment of Compliance with Paragraph 14 (Abatement) for the Covered Period.....	6
VI. Assessment of Compliance with Paragraph 15 (RRP) for the Covered Period.....	11
VII. Assessment of Compliance with Paragraphs 8, 9, and 14 for the Covered Period at Converted RAD/PACT sites.....	16
VIII. Conclusions and Next Steps	20

I. Summary of Compliance in January 2026 Publication

As required by Paragraph 30 (b) of Exhibit A of the HUD 2019 Monitoring Agreement (the “Agreement”), this report is compiled and distributed by NYCHA on a semi-annual basis to facilitate NYCHA’s certification as to its compliance Paragraphs 8 to 15 of the Agreement. Paragraph 8 requires that NYCHA abate all lead-based paint at Harlem River and Williamsburg within 5 years of the Agreement. Both sites were converted to the Permanent Affordability Commitment Together (“PACT”) Program. As of November 30, 2025, NYCHA’s Real Estate Development Department (“REDD”) is reporting that the PACT partners have completed the interior abatements at both properties, except for one unit at Harlem River that remains outstanding due to ongoing legal proceedings needed to gain access and complete the abatement. Previously, NYCHA reviewed the Williamsburg abatement plan and determined that exterior common areas had not been included in the original scope. Because Paragraph 8 requires abatement of all lead-based paint, NYCHA worked with the PACT partner to retest the exterior common areas at the 0.5 mg/cm² threshold, and that testing has now been completed.

Paragraphs 9 to 12 provide abatement benchmarks over 20 years following the Agreement. According to NYCHA’s Lead Hazard Control Department (“LHC”), from January 1, 2022¹ to November 30, 2025, NYCHA abated and cleared approximately 16,457 units out of approximately 59,641 units at 0.5 mg/cm² across the public housing portfolio via a range of programs including its move-out program, Team for Enhanced Management Planning and Outreach (“TEMPO”) abatement program, and other special projects. As of November 30, 2025, 4,359 units out of approximately 5,681 units requiring abatement (75%) had been reported as abated and cleared among the PACT sites.

Paragraph 13 provides definitions of “common areas” and “abatement,” which NYCHA applies to its abatement reporting and work.

The table below summarizes compliance status with Paragraph 14 (Abatement) and Paragraph 15 (Renovation, Repair, and Painting).

Summary of Compliance in July 2025 Publication and January 2026 Publication

Paragraph Section	Compliance in July 2025 Publication	Explanation of non-compliant findings	Compliance in January 2026 Publication (Current)	Explanation of non-compliant findings
14a	Yes		Yes	
14b	Yes		Yes	
14c	Yes		Yes	
14d	Yes		No	Occupied Units: 91%

¹ Following NYC’s lead standard change on December 1, 2021.

Paragraph Section	Compliance in July 2025 Publication	Explanation of non-compliant findings	Compliance in January 2026 Publication (Current)	Explanation of non-compliant findings
				<i>Work orders did not contain dust wipe methodologies.</i>
14e	No	Moveout Units: 90.0% <i>Work order missing dust wipe vendor certification.</i> ²	Yes	
14f	Yes		Yes	
14g	No	Field Monitoring: <i>Property management lead disclosure files: 74.31%</i> <i>Tenant folder review: 63.44%</i>	No	Field Monitoring: <i>Property management lead disclosure files: 71.82%</i> <i>Tenant folder review: 68.82%</i>
15a	No	Field Monitoring: 94.2% File Review: 90.3% <i>Additional training and supervision are needed to ensure system users are properly following RRP required protocols.</i>	No	Field Monitoring: 94.34% File Review: 90.1% <i>Additional training and supervision are needed to ensure system users are properly following RRP required protocols.</i>
15b	No	<i>EHS observed 100% compliance with NYCHA employees, however they could not observe vendors, and so Compliance cannot recommend certification of this section.</i>	No	<i>EHS observed 100% compliance with NYCHA employees, however they could not observe vendors, and so Compliance cannot recommend certification of this section.</i>
15c	Yes		Yes	
15d	No	Field Monitoring: 83.57% <i>Storeroom inspection for RRP supplies significantly decreased in compliance from 90.43% in the January 2025 Lead Certification.</i>	No	Field Monitoring: 89.05% <i>Storeroom inspection for RRP supplies increased in compliance from 83.57% in the July 2025 Lead Certification.</i>
15e	No	File Review: 89% <i>The renovator checklist needs to be accurate and complete.</i>	No	File Review: 96%

² LHC subsequently uploaded the missing dust wipe vendor certifications upon request.

Paragraph Section	Compliance in July 2025 Publication	Explanation of non-compliant findings	Compliance in January 2026 Publication (Current)	Explanation of non-compliant findings
				<i>The renovator checklist needs to be accurate and complete.</i>
15f	No	Field Monitoring: 98.4% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and document distribution.</i>	No	Field Monitoring: 97.2% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and document distribution.</i>
15g	No	Field Monitoring: 72% for NOEs and 83% for NOHR exception cases - <i>NYCHA needs a period of consistent compliance for NOHRs and NOEs.</i>	No	File Review: 65% for NOEs and 80% for NOHR exception cases delivered within the required 15-day period. <i>NYCHA needs a period of consistent compliance for NOHRs and NOEs.</i>
15h	No	File Review: 89% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>	No	File Review: 96% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>
15i	No	File Review: 89% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>	No	File Review: 96% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>
15j	No	File Review: 96% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i> <i>NYCHA needs to improve the timing of initial clearance examinations and performance of re-clearance examinations. NYCHA needs to institute worksite protections after cleaning but pending final clearance results.</i>	No	File Review: 93.1% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i> <i>NYCHA needs to improve the timing of initial clearance examinations and performance of re-clearance examinations. NYCHA needs to institute worksite protections after cleaning but pending final clearance results.</i>

See sections V and VI for further information regarding findings of noncompliance.

II. Introduction and Methodology

To evaluate NYCHA's ability to certify to the requirements of Paragraphs 8, 14, and 15, on January 31, 2026, the Compliance Department conducted a review of NYCHA records and activities for the period between June 1, 2025 and November 30, 2025 ("Covered Period"). Additionally, the NYCHA Environmental Health and Safety Department ("EHS") issued a report (annexed as Attachment A) documenting field oversight activities that should be read in tandem with this Report.

The Compliance Department uses the following methodology to evaluate NYCHA's compliance with Paragraphs 8, 14, and 15:

- **Existence of Written Policies, Procedures, or Contract Specifications:** This criterion evaluates whether NYCHA has established specific written policies, procedures, contract specifications, training, or instructional materials that required staff and/or vendors to perform the requirements set forth in the regulations during the Covered Period. The NYCHA Lead Standard Procedure (annexed as Attachment B), subsequent Compliance Advisory Alerts, and Regulatory Requirements (annexed as Attachment C) have been reviewed and cover the Agreement requirements.
- **Existence of IT Controls:** This criterion evaluates whether NYCHA's Maximo Work Order system (or other system) has established IT controls that strengthen compliance with the applicable regulatory requirements during the Covered Period. These IT controls are annexed as Attachment D. The business requirements document ("BRD") and other abatement-related IT controls are annexed as Attachment E.
- **Field Monitoring Protocols:** This criterion evaluates whether NYCHA has performed any field monitoring during the Covered Period of abatement, interim control, or Renovation Repair and Paint ("RRP") projects to assess compliance with each specific regulatory requirement and the results of the quality assurance or field monitoring activities.
- **Recordkeeping/File Review:** This criterion evaluates whether project files for work orders closed during the Covered Period contain documentation required by and/or evidencing compliance with each specific regulatory requirement.

LHC provides updates on abatement requirements outlined in Paragraphs 9-12. Refer to [Section IV](#) for more information from LHC and progress on abatement completions.

Note, the sections below discuss compliance results from field oversight and file review for Paragraph 14 and 15. In some cases, the results from each component are not compliant, and the non-compliant results from both components are outlined in the body of this report. In other cases, the compliant results are discussed in the Attachment (either EHS report or file review results), and the non-compliant results are outlined in the body of this report. The file review data below reflects information available as of December 23, 2025.

III. Updates from EHS

During this Covered Period, EHS escalated 13³ observations to the Office of the Chief Compliance Officer (“CCO”) and LHC for further review, all of which pertained to developments that failed both their initial lead disclosure document inspection and reinspection. There were no deficiencies identified during any RRP, lead abatement, or clearance jobs that required escalation Office of the CCO. Compliance took the following actions in response to the EHS escalations for missing documents:

- Compliance held a training session that was attended by 2 Neighborhood Administrators, 1 Assistant Property Manager, and 1 Neighborhood Contract Manager in September and December of 2025. The training covered how properties should compile a binder for each property in their consolidation and addressed what was missing during each property’s inspection.

Please see Attachment A for the full EHS report and detailed EHS escalation summary.

IV. Programmatic Updates

Lead Hazard Control

As of November 30, 2025, NYCHA completed X-ray fluorescence (“XRF”) lead inspections in 133,055 residential units at the 0.5 mg/cm² standard, which is about 90% of the total testing universe. Of these, 59,641 units (45%) tested positive for lead-based paint, while 73,414 units (55%) tested negative.

Out of the 59,641 units that tested positive, NYCHA has abated 16,547 units. These units are now considered lead-free and safe for occupancy by residents. Based on this progress to date, LHC reports that NYCHA is on pace to meet the 10-year target⁴ with the Agreement.

LHC reports that it remains focused on the Verification Project, ensuring thorough quality assurance by conducting both desk reviews of documentation and field inspections of previously abated units. The Verification Project targets units that have not previously received a quality assurance inspection after the abatement was completed. As of November 30, 2025, LHC has completed quality assurance for 2,782 units and attempted all remaining units out of the target universe of 3,592 units. Currently, 535 units have been identified as requiring additional work. The majority of these units involve a single component that needs to be abated, which typically requires simpler corrective actions. As of November 30, 2025, NYCHA has abated 299 units needing additional work. LHC remains committed to ensuring that all abatement work meets the highest standards and that all deficiencies are addressed in a timely and efficient manner.

³ 1 additional escalation was issued for an inspection and reinspection that found a missing prepackaged RRP supply kit at Red Hook East. The inspections occurred in November 2025, but the escalation was issued outside of the covered period for this report.

⁴ “NYCHA shall abate, in accordance with 40 C.F.R. part 745 subpart L, all lead-based paint in 50% of apartment units that contain lead-based paint, and interior common areas that contain lead-based paint in the same building as those units. Units and interior common areas in the Early Abatement Developments shall be included in calculating compliance with the requirements in this paragraph.”

Abatement During Capital Projects

During the Covered Period, the Asset & Capital Management (“A&CM”) Division continued reporting each quarter to NYCHA’s Compliance Department on projects that required lead remediation pursuant to the A&CM White Paper. According to A&CM, from June 1, 2025 to November 30, 2025, there were 8 capital projects that impacted positive or presumed positive components. For non-public space abatement, there were boiler room projects at Carver, Bronx River, and Lincoln; and exterior restoration and/or roofing projects at Douglass I, Douglass II, and Sotomayor. For common area abatement, there were elevator and/or lobby projects at 303 Vernon Avenue and Baruch.

V. Assessment of Compliance with Paragraph 14 (Abatement) for the Covered Period

General Statement

NYCHA Compliance uses 2 methods for tracking compliance against the requirements of Exhibit A, Paragraph 14 of the Agreement for work impacting the public housing portfolio: file review and field monitoring.

For file review, the Compliance Department reviewed 75 abatements randomly selected for review, including 40 abatements in vacant units (“moveouts”) and 35 abatements in occupied units. The results of this review are set forth in Attachment F.

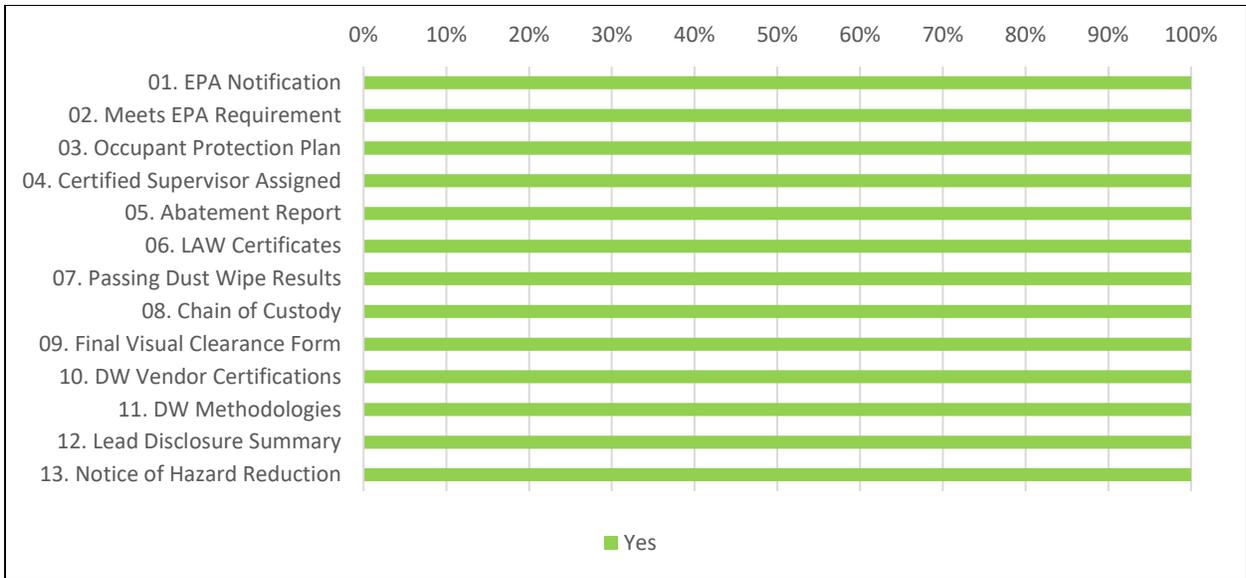
- The Compliance Department’s Monitoring Unit (“MU”) selected a random sample of moveout abatement work orders out of a total of 838 work orders that had an “Actual Finish” date during the Covered Period and were closed as of November 30, 2025.
- Of the 35 randomly selected occupied units, 29 are occupied with children under the age of 6 (“CU6”) and 6 are elevated blood lead level (“EBLL”) abatements closed during the Covered Period.

Documentation of the abatement field monitoring performed by EHS that is described in this section is set forth in Attachment A.

The specific forms and language to fulfill the Agreement sections and regulations under Paragraph 14 are identical to evidence used for PACT sites. The Compliance Department also includes Lead Disclosure Files in its Section 9 file review.

Summary of File Review for Abatements Performed in 40 Moveout Units

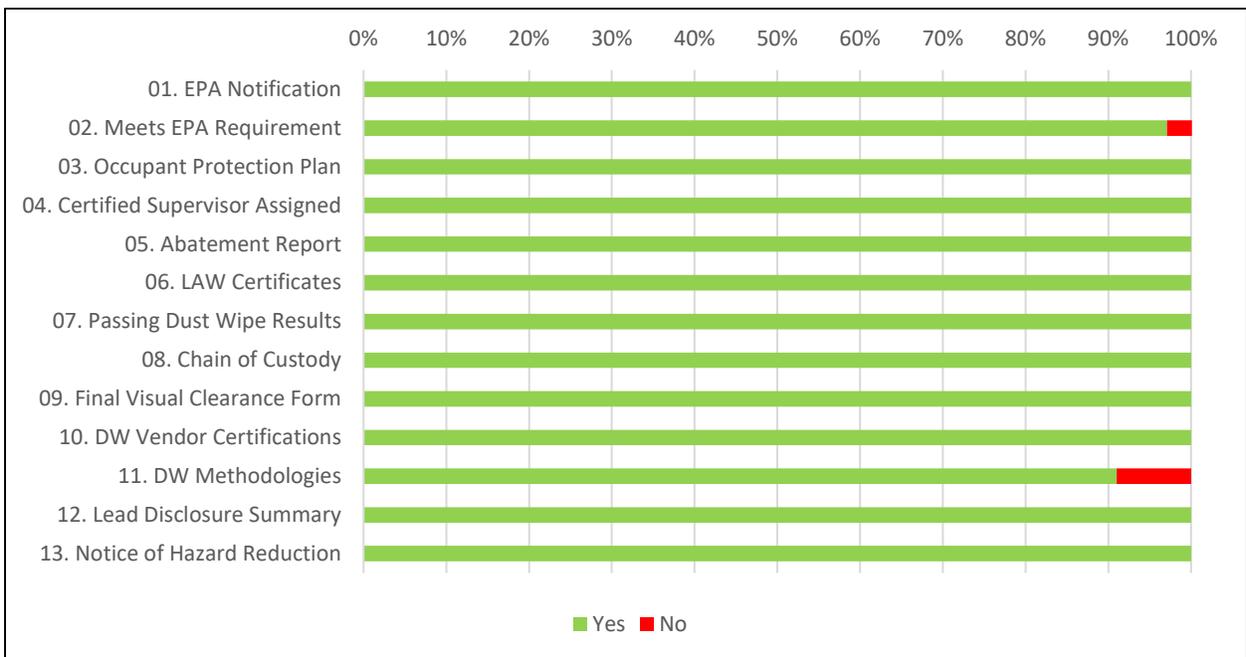
The MU reviewed a sample of 40 total moveouts with an “Actual Finish” date between June 1, 2025 and November 30, 2025, and a work order status of “CLOSE” as of November 30, 2025.



All 40 abatement cases reviewed met the EPA notification requirement and contained the specified abatement and clearance documents, resulting in a 17.5% improvement over the prior review period.

Summary of File Review for Abatements Performed in 35 Occupied Units

The MU also selected 29 abatements in units abated as part of the TEMPO Abatement Program, which have CU6 occupants, and 6 EBLL abatements closed during the Covered Period. The results of this review are set forth in Attachment F.



Overall, NYCHA performed better in unoccupied units than in occupied units:

- 1 file did not meet the 5-day EPA notification requirement. Upon request, an earlier EPA notification that did meet the requirement has been uploaded to Maximo. This notification expired prior to abatement.
- 3 files did not contain dust wipe methodologies. Upon request, LHC has uploaded methodologies.

Of note, 1 file contained a supervisor's certificate that expired after the abatement work was complete but before the abatement report was signed. This occurred in a CU6 Occupied unit. The certificate was valid through the abatement work. Upon notification, LHCD worked with the vendor to obtain the updated supervisor certificate.

The following sections provide details of NYCHA's Compliance Department and EHS reviews, including where issues were identified in the file and/or field review:

Paragraph 14(a): NYCHA shall ensure that a certified supervisor is onsite or otherwise available in accordance with 40 CFR § 745.227(e).

Attachments A and F demonstrate compliance based on field and file review results.

Paragraph 14(b): NYCHA shall notify EPA of lead-based paint abatement activities electronically using EPA's Central Data Exchange (CDX) in accordance with 40 CFR § 745.227(e)(4)(vii).

Attachments A and F demonstrate compliance based on field and file review results.

Paragraph 14(c): NYCHA shall prepare and implement written occupant protection plans for all abatement projects in accordance with 40 CFR § 745.227(e)(5).

Attachments A and F demonstrate compliance based on field and file review results.

Paragraph 14(d): NYCHA shall specify methods of collection and lab analysis in accordance with 40 CFR § 745.227(f).

Based on the file review during the Covered Period, the Compliance Department does *not* recommend that NYCHA certify Paragraph 14(d). The file review revealed issues in occupied units as discussed below. See Attachment A for field monitoring results which meet the compliance threshold.

- **File Review for 14(d)**

The MU reviewed 35 occupied abatement work orders and found a 91% compliance rate with 3 cases that did not contain methods of dust wipe collection and lab analysis.

The MU reviewed 40 moveout abatement work orders and found a 100% compliance rate.

Paragraph 14(e): NYCHA shall ensure that a clearance examination is performed, and a clearance examination report provided by a lead paint inspector/risk assessor certified and licensed as applicable for the property location, in accordance with 24 CFR § 745.227(e) (8)-(9). The lead paint inspector/risk assessor must be independent of the lead-based paint abatement firm, supervisor, and contractors performing the abatement work.

Attachments A and F demonstrate compliance based on field and file review results.

Paragraph 14(f): NYCHA shall ensure that the certified supervisor on each abatement project prepares an abatement report in accordance with 40 CFR § 745.227(e)(10).

Attachment F demonstrates compliance based on file review results.

Paragraph 14(g): NYCHA shall maintain records in accordance with 40 CFR § 745.227(i) and 24 CFR § 35.125.

Based on the file review during the Covered Period, the Compliance Department does *not* recommend that NYCHA certify to Paragraph 14(g). The Lead Disclosure Summary and Notice of Hazard Reduction forms were present in 100% of the files reviewed. However, the file review and field observations revealed issues in the vacant and occupied unit documents, as discussed below.

- **Field Monitoring for 14(g)**

EHS completed 181 inspections with a 71.82% compliance rate for property management lead disclosure files (development binder). EHS completed 186 inspections with a 68.82% compliance rate for the tenant folder review.

- **IT Controls for 14(g)**

NYCHA does not have IT controls available that support this requirement, although as of December 2019, the Occupant Protection Plan (“OPP”), the EPA notification, and abatement reports are to be attached to the Maximo work orders. IT does not have a control to ensure the correct forms are uploaded to the work order.

Abatement and Dust Wipe Vendor Compliance

All dust wipe and abatement vendor contracts have been reviewed for compliance with the Agreement requirements and can be found below.

During the Covered Period, NYCHA utilized 6 vendors to perform abatements and 5 vendors to perform dust wipes. Note that contracts for abatement vendors must adhere to 14(a), 14(b), 14(c), and 14(f), and dust wipe vendors must adhere to 14(d) and 14(e).

Contract/Vendor Name	Contract Type (Abatement or Dust Wipe)	Findings from Prior Report (July 2025)	Actions taken to correct	Findings of Current Reporting Period
- INTERNATIONAL ASBESTOS REMOVAL, INC.	Abatement	Not active.	None.	Paragraph 14(f): contract language requires an abatement report but does not specify that the abatement report is prepared by the supervisor.

Contract/Vendor Name	Contract Type (Abatement or Dust Wipe)	Findings from Prior Report (July 2025)	Actions taken to correct	Findings of Current Reporting Period
- AIRTEK ENVIRONMENTAL, LLC - GENESIS ENVIRONMENTAL CONSULTANTS, INC. - LEAD BY EXAMPLE ENVIRONMENTAL, LLC	Dust Wipe	Not active.	None.	Blanket Purchase Order and Contract Terms and Conditions provided do not contain language as specified in Paragraphs 14(d) and 14(e).
- ATHENICA ENVIRONMENTAL SERVICES, INC.	Dust Wipe	Not active.	None.	Blanket Purchase Order provided does not contain language as specified in Paragraphs 14(d) and 14(e).
-JOSEPH ENVIRONMENTAL LLC	Abatement	Not active.	None.	Not active.
- NEW YORK ENVIRONMENTAL SYSTEMS, INC. AGD CONTRACTING CORP. - ABATEMENT UNLIMITED INC - EMPIRE CONTROL ABATEMENT INC - LINEAR ENVIRONMENTAL CORP. ⁵	Abatement	Paragraph 14(f): contract language requires an abatement report but does not specify that the abatement report is prepared by the supervisor.	Continued coordination between LHC and Procurement	Paragraph 14(f): contract language requires an abatement report but does not specify that the abatement report is prepared by the supervisor.
-ATC GROUP SERVICES LLC	Dust Wipe	None.	None.	None.

The Compliance Department will continue to work with Procurement, Legal, and LHC to ensure the required language is included in future contracts.

⁵Compliance reported the same issue with Linear Environmental Corp. since the January 2025 Certification. This remains an open and repeat issue for this vendor.

VI. Assessment of Compliance with Paragraph 15 (RRP) for the Covered Period

The Compliance Department's file review for this section is annexed as Attachment G.

Paragraph 15(a): Establishing and maintaining sufficient information in NYCHA's renovation and maintenance computer systems to readily identify renovation and maintenance projects involving work to which lead-safe work practices regulations apply in accordance with 24 CFR §§ 35.1330, 35.1350 and 40 CFR §§ 745.85, 745.89.

The Compliance Department does *not* recommend certifying to compliance with 15(a) because based on file review and field observation results discussed below, NYCHA employees are not consistently answering the RRP question accurately.

- **File Review for 15(a):**

Potential RRP work orders contain a "flag" in Maximo signifying the presence of presumed or known lead-based paint ("LBP") in the apartment. This "RRP flag" then requires that any paint-disturbing work in the unit requires renovators to follow RRP protocols, including a clearance examination.

File review found that, for 90.10% (62,087 out of 68,911) of work orders closed between June 1, 2025 and November 30, 2025 where renovators must answer the RRP enforcement questions, renovators indicated that they were not performing RRP work. This trend requires continued monitoring of whether the workers' selection of "No" or "No Components Selected" to the RRP enforcement questions is appropriate.

Importantly, answering "No" to the RRP enforcement question does not necessarily indicate non-compliance and, indeed, can be entirely appropriate in several circumstances. For instance, NYCHA has a growing volume of XRF data showing that apartments are either negative or have a limited number of lead components at 1.0 and 0.5 mg/cm². If a renovator is performing work in a negative apartment or working on components that do not contain LBP, the renovator is correct to answer "No" to the RRP enforcement question. Additionally, for some work orders, the renovators are not performing work at all or are not performing work that disturbs paint above the de minimis thresholds, such as painting with no surface preparation or drilling small holes to install new cabinets on a wall. In these circumstances, renovators would also be correct to select "No."

- **Field Monitoring for 15(a):**

EHS completed 212 inspections with a 94.34% compliance rate for RRP work verification by personnel. In 12 cases, staff entered the improper response to the Maximo prompt, "Are you Performing RRP?"

Paragraph 15(b): Ensuring that only properly trained and certified firms and workers are assigned to perform work to which lead-safe work practices apply in accordance with 24 CFR §§ 35.1330, 35.1350 and 40 CFR §§ 745.85, 745.90.

The Compliance Department does *not* recommend certifying for this section. While EHS observed 100% compliance with NYCHA employees, they could not observe vendors. For the full EHS report, see Attachment A. Additionally, the MU's file review found 100% compliance as discussed in Attachment G.

- **IT Controls for 15(b):**

At present, Maximo does not identify the vendor or vendor staff assigned to perform RRP work at the lead paint developments. NYCHA instead relies upon either development staff or NYCHA paint supervisors to manually check the qualifications of the vendor and vendor staff at the development.

Paragraph 15(c): Obtaining and Maintaining certification as a certified renovation firm if any of the workers described in this paragraph are NYCHA employees, and the work they do is covered by 40 CFR part 745, subpart E ... in accordance with 40 CFR §§ 745.81, 745.89.

NYCHA is a certified RRP firm. Proof of the certification is annexed as Attachment H. Based on this documentation, there is evidence supporting NYCHA's certification that it is in compliance with the requirements set forth in 15(c).

Paragraph 15(d): Ensuring supplies necessary to perform lead-safe work practices in accordance with 24 CFR § 35.1350 and 40 CFR § 785.85 are readily available to trained and certified workers.

The Compliance Department does *not* recommend certifying for 15(d) based on field results. Field observations revealed issues in maintenance of RRP supplies within storerooms.

- **Field Observations for 15(d):**

Out of 137 total storeroom inspections for RRP supplies, 15 failed inspections, resulting in a compliance rate of 89.05%, an increase from the compliance rate of 83.57% in the July 2025 Lead Certification Report. The 15 failed inspections contained a total of 19 missing items. The most frequently missing item was the 6-mil polyethylene sheeting, which was lacking during 4 inspections.

Paragraph 15(e): Ensuring that firms and workers assigned to perform the renovation or maintenance work to which lead safe work practices apply use the RRP Renovation Checklist and establish and maintain records necessary to demonstrate compliance with the RRP Rule in accordance with 40 CFR § 745.86.

The Compliance Department does *not* recommend certifying for this section because NYCHA does not have strong recordkeeping practices for vendors, nor does it have appropriate controls to ensure that NYCHA employees accurately complete the RRP checklists. EHS found compliance as to NYCHA employees, discussed in Attachment A with a compliance rate of 100%, but did not observe vendors in their field oversight. As discussed below, there were concerns about the process for RRP checklist completion.

- **File Review for 15(e):**

Attachment G has details about the Compliance Department's review of work orders and the appropriate RRP Renovation Checklist. The Compliance Department assessed 210 work orders for the required attachments and confirmed whether the work orders had the RRP Renovation Checklist. 201 of the 210 work orders (96%) had staff that completed the RRP Renovation Checklist. The remaining work orders had partially completed RRP Renovation Checklists.

The Compliance Department first reported on instances of supervisors completing the RRP Renovation Checklist on behalf of the renovator(s) in the January 2025 Lead Certification Report. Subsequently, LHC and Operations have issued guidance to staff about requesting administrative closure if work orders were not properly completed and closed. During this Covered Period, the Compliance Department found

that all checklists within each work order were completed by someone that logged work within the Actuals tab in Maximo. See Attachment G. According to NYCHA Operations, supervisors assist their staff by completing Maximo entries that result from frequent IT connectivity issues.

Paragraph 15(f): Ensuring that residents of units and developments in which renovation or maintenance work to which lead-safe work practices apply will be performed are informed of the work to be performed and the risks involved in accordance with 24 CFR § 35.1345 and 40 CFR §§ 745.84, 745.85.

Compliance does *not* recommend certifying to this requirement until field monitoring shows a period of consistent compliance for vendors and NYCHA strengthens policies on vendor record-keeping. With respect to NYCHA’s internal staff, there is evidence supporting NYCHA’s certification that it is in compliance with the requirements set forth in 15(f) as seen in Attachments A and G.

Paragraph 15(g): Retaining records demonstrating compliance with the regulations set forth at 24 CFR § 35.125 and 40 CFR § 745.84.

NYCHA does *not* recommend certifying to compliance with this paragraph. A review of the Maximo data still shows that NYCHA needs to improve the timing of distribution of NOHRs as well as the distribution of Notices of Evaluation (“NOE”).

Though not explicitly required under 24 CFR § 35.125, there is still not a process for notifying residents in writing following a failed dust wipe. Instead, upon a failed clearance, residents are notified by telephone or email about the need for the development to reschedule a re-cleaning of the work area. A second clearance examination is required, and the NOHR are only generated when the unit passes clearance. Now that an automated system is in place for NOHRs, NYCHA needs to work on a method to auto-generate written notice to the residents following a failed clearance examination.

- **File Review for 15(g):**

Notices of Evaluation

The Compliance Department reviewed XRF inspection work orders in Maximo completed between June 1, 2025 and November 30, 2025. Based on data, as of December 11, 2025, 4,710 of 7,292 (65%) completed XRF inspection work orders contained the required NOE in Maximo. According to LHC, all residents receive the XRF inspection NOE within 2 weeks of the vendor completing the inspection. However, the NOE is not uploaded to Maximo until LHC completes their internal QA process, which led to the 2,582 work orders missing a NOE at the time of the review.

Notices of Hazard Reduction

Between June 1, 2025 and November 30, 2025, the MU found 1,650 RRP work orders requiring an NOHR via Data Warehouse. The MU selected a sample of 90 of these work orders and found that all 90 of these work orders had an associated NOHR. The MU confirmed the presence of these NOHRs as attachments in Siebel or Maximo.

The MU reviewed the sampled work orders by case type, whether as a non-exception (auto) case or exception (manual) case. In non-exception cases, NOHRs are automatically generated through the Siebel system, and in exception cases, the NOHR must be manually generated by LHC.

Notices of Hazard Reduction – Non-Exception (Auto) Cases

Between June 1, 2025 and November 30, 2025, the MU found 1,361 “Non-Exception” cases via Data Warehouse. The MU selected a sample of 50 of these cases and found that all 50 cases contained a copy of the NOHR attached in Siebel.

Notices of Hazard Reduction – Exception (Manual) Cases

For exception cases, the MU reviewed a sample of 40 work orders from a list of 289 exception work orders. The MU found that all 40 (100%) work orders sampled had the respective NOHR uploaded in Maximo. Further, all 40 (100%) work orders contained the respective email to the development with the NOHR attached. The MU found that 32 of 40 work orders sampled were sent to the development within the required 15 calendar day deadline, which is an 80% compliance rate and an improvement from the 50% compliance rate in the July 2025 Lead Certification Report. LHC provided copies of prior emails sent to the development within the 15-calendar day deadline for 4 of the 8 work orders. The 4 work orders for which emails were not sent to the development before the deadline were sent between 17 and 21 days after the clearance date.

Paragraph 15(h): Containing or causing to be contained any work area to which lead safe work practices will apply by isolating the work area and waste generated so that no dust or debris leaves the work area in accordance with 24 CFR § 35.1345 and 40 CFR § 745.85(a).

The Compliance Department does *not* recommend certifying to this requirement until NYCHA strengthens policies on vendor record-keeping and monitoring. EHS field monitoring for NYCHA employees demonstrated compliance as discussed in Attachment A. The results of the file review are discussed in the description of compliance with paragraph 15(e), which identifies the work orders where the RRP checklist was completed.

Paragraph 15(i): Containing, collecting, and transporting waste from the renovation in accordance with 40 CFR § 745.85(a)(4).

Overall, the Compliance Department does *not* recommend certifying to this requirement until NYCHA strengthens policies on vendor record-keeping and monitoring. EHS field monitoring results were 100% compliant but did not include vendors in its observations. File review results are captured in 15(e) and Attachment G.

Paragraph 15(j): Performing cleanup of any work area to which lead safe work practices apply until no debris or residue remains in accordance with 24 CFR § 35.1345, 35.1335 and 40 CFR § 745.85(a) and (b) and conducting and passing a clearance examination in accordance with 24 CFR § 35.1340 (including any follow-up as required by that section’s subsection (e) after clearance failure(s)), as provided by 40 CFR § 745.85(c).

NYCHA does *not* recommend certifying to compliance with this paragraph. A review of the Maximo data still shows that NYCHA needs to improve the timing of initial clearance examinations and the performance of re-clearance examinations. EHS field observations found compliance; see Attachment A. A detailed discussion of the issues in file review is below.

- **File Review for 15(j):**

Timing of Initial Clearance Examinations: During the Covered Period, NYCHA completed 2,741 of 2,943 (93.1%) clearance examinations (dust wipes). NYCHA completed 2,327 of 2,741 (84.9%) of these

clearance examinations within 24 hours of the last labor transaction on the corrective maintenance (“CM”) work order. NYCHA completed 2,498 of 2,741 (91.1%) of these clearance examinations within 48 hours of the last labor transaction on the CM work order. The percentage of clearance examinations performed during the Covered Period declined from the last reporting period. The percentage of clearance examinations performed within 24 and 48 hours improved from the last reporting period. See Attachment G.

Passed/Failed/Pending/Unperformed Statuses at the End of the Six-Month Reporting Cycle: In

addition to evaluating the timing of initial clearance examinations, Compliance examines the trends exhibited each month for the number of dust wipe batches that (i) have passed; (ii) have passed after the initial dust wipe failed; (iii) remain in fail status; (iv) have failed based on a visual clearance; and (v) have results pending at the laboratory. The Compliance Department conducted a review of the status as of December 18, 2025 for all clearance examinations from June 1, 2025 to November 30, 2025 as shown in the table below.

	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	TOTAL
CAPTURED SAMPLE	2	0	2	3	6	4	17
FAILED DUST WIPE	26	12	18	11	11	14	92
FAILED VISUAL PAINT	17	15	10	38	62	33	175
NEEDS DUST WIPE INSPECTION	15	8	4	4	10	2	43
PASSED	472	436	375	462	501	370	2,616
TOTAL	532	471	409	518	590	423	2,943

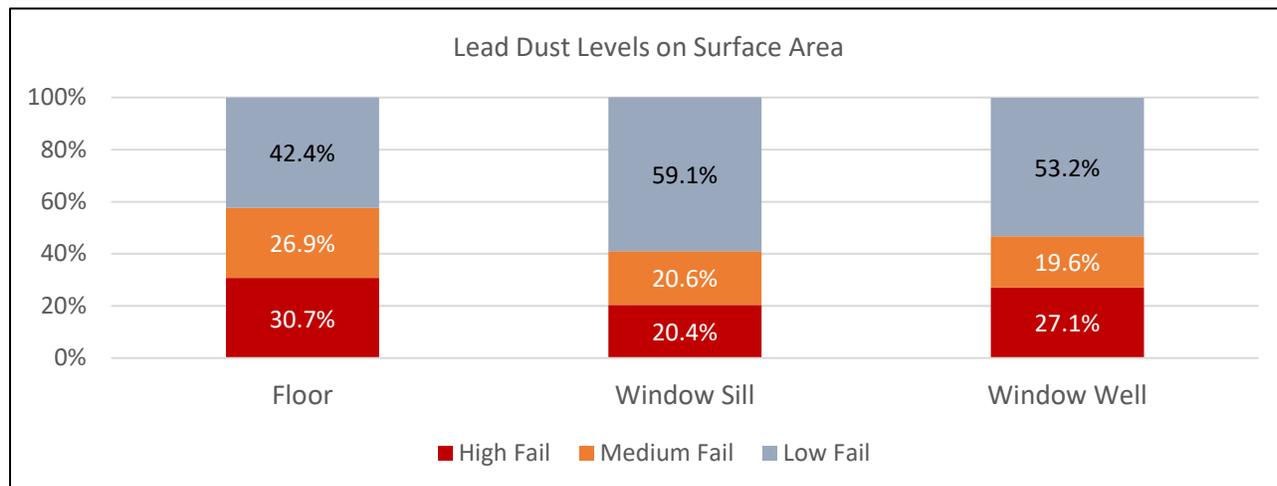
There are still some compliance shortfalls that NYCHA needs to address, as 11.1% of dust wipe clearance examinations are not in passed status.

Over the last 3 Lead Certification Reports, dust wipes in fail status at the end of the reporting period have steadily increased. 1.9% failed in the January 2025 publication, 5.3% failed in the July 2025 publication, and 9.1% failed in this report’s Covered Period. This indicates that NYCHA can still make improvements in the re-cleaning and re-clearance process. As first reported in the July 2024 Lead Certification Report, while LHC did build dashboards and trackers to monitor development responsiveness on re-cleaning needs, some lead clearance projects still remain in fail status for months.

Lead Dust Levels of Individual Failed Samples by Surface Area

Compliance also evaluates the levels of failed dust wipe samples to distinguish between minor exceedances and more significant exceedances. The chart below shows the lead levels of individual failed samples within pre-defined ranges, broken down by a range of low, medium, or high fail categories from June 1, 2025 to November 30, 2025. This analysis matches New York City’s revised lead

dust standards from June 2021. In addition, regardless of the category, any failed sample requires re-cleaning and re-clearance.



The (i) Low Fail samples for window sills that fall between 40-100 $\mu\text{g}/\text{ft}^2$, (ii) Low Fail samples for floors that fall between 5-10 $\mu\text{g}/\text{ft}^2$, and (iii) Low and Medium Fail samples for window wells that fall between 100-400 $\mu\text{g}/\text{ft}^2$ would all be below the current EPA standards.

The percentage of high fail dust wipes for flooring increased from 26.3% in the July 2025 HUD Certification report to 30.7% in this Certification report. For window sills, the percentage of high fail dust wipes increased, shifting from 19.0% in the July 2025 HUD Certification report to 20.4% in this Certification report. For window wells, the percentage of high fail dust wipes increased from 19.8% in the July 2025 HUD certification report to 27.1% in this Certification report.

VII. Assessment of Compliance with Paragraphs 8, 9, and 14 for the Covered Period at Converted RAD/PACT sites

To assess compliance at Rental Assistance Demonstration (“RAD”)/Permanent Affordability Commitment Together (“PACT”) sites with Paragraphs 8, 9, and 14, NYCHA employs various tools, including file review and field visits, described in the following sections.

Overall Compliance Assessment for Paragraph 8:

Under Paragraph 8, NYCHA was required to complete abatement of all lead-based paint at Harlem River Houses and Williamsburg Houses by January 31, 2024. Both sites were converted to the PACT Program and the abatement performed under that program by developer partners. As of November 30, 2025, REDD is reporting that the PACT Partner for Harlem River has abated 691 of 692 units (99.9%), with 1 remaining unit pending due to ongoing legal proceedings needed to gain access and complete the abatement. As previously reported, Harlem River has also completed abatement of the interior and exterior common areas. REDD also reported that the PACT Partner for Williamsburg has completed 100% of unit and interior common area abatement.

Previously, NYCHA determined that the Williamsburg abatement plan did not require abatement of exterior common areas and allowed interim controls, which require ongoing maintenance. Because Paragraph 8 requires full abatement of all lead-based paint, NYCHA worked with the PACT Partner to

retest the exterior common areas using the 0.5 mg/cm² threshold, and testing has been reported to have been completed. NYCHA is coordinating with the PACT Partner to schedule the required exterior abatement.

IT Controls for Paragraph 8 and other RAD/PACT sites:

Since PACT Partners do not use a single system to collect documentation for abatement projects, NYCHA’s Compliance Department and REDD created a uniform reporting system using Smartsheet. This system is used to track compliance with Paragraph 8 at the Early Abatement Developments (“EADs”) and with Paragraph 15, Section III for RAD/PACT. Each PACT Partner is required to upload information on a unit-by-unit basis and attach the supporting documents needed for NYCHA to track progress toward full project completion.

While some PACT Partners have improved their performance by routinely updating and uploading records, the absence of an automated reporting structure has become more challenging as the number of converted units increases. The Smartsheet also presents issues in maintaining uniformity for interior and exterior common area tracking because the scope and approach can vary widely across PACT projects.

File Review for Paragraph 8 and Paragraph 14:

The Compliance Department conducted a review of the abatement documents for a random sample of units that were marked as having been abated and cleared during the Covered Period. NYCHA reviewed documentation for 50 abated and cleared units across 7 sites based on the total number of units that had been abated at a site.⁶ The Compliance Department shared the deficiencies from their review with REDD, which followed up with each PACT Partner to communicate the errors identified to ensure correction and proper documentation going forward. The details of the document review are set forth in Attachment K.

Documents were evaluated for compliance with regulatory requirements listed under Paragraph 14 including the presence of:

Summary of PACT Abatement Compliance at PACT Properties

Indicator	Evidence of Compliance (in Maximo or Smartsheet)	BBM	BLV	EAS	EDW	MVL	RPR	SWN
Certified Supervisor Assigned - 14(a)	Certified lead abatement supervisor assigned to abatement with current certification on file	100%	100%	100%	100%	100%	100%	0%

⁶ Compliance reviewed files at the following sites: Boston Secor, Boston Road Plaza & Middletown Plaza (“BBM”) (4 units reviewed), Boulevard (“BLV”) (2 units reviewed), Eastchester Gardens (“EAS”) (9 units reviewed), Edenwald (“EDW”) (15 units reviewed), Manhattanville (“MVL”) (18 units reviewed), Reid Apartments + Park Rock Consolidated (“RPR”) (1 unit reviewed), and Sack Wern (“SWN”) (1 unit reviewed).

Indicator	Evidence of Compliance (in Maximo or Smartsheet)	BBM	BLV	EAS	EDW	MVL	RPR	SWN
Lead Abatement Worker ("LAW") Certificates - 14(a)	Certifications on file for each lead abatement worker assigned to abatement	100%	100%	89%	100%	100%	100%	0%
Environmental Protection Agency ("EPA") Notification - 14(b)	EPA was notified of abatement	100%	100%	100%	100%	6%	100%	0%
Meets Five-Day EPA Requirement - 14(b)	EPA must be notified 5 full business days prior to the start of abatement	100%	100%	22%	100%	6%	100%	0%
Occupant Protection Plan - 14(c)	Completion of the Occupant Protection Plan	100%	0%	100%	100%	89%	100%	0%
Dust Wipe Methodologies - 14(d)	Specified methods of collection and lab analysis of dust wipes	100%	50%	89%	100%	100%	100%	100%
Chain of Custody - 14(e)	Chain of Custody completed for final passing dust wipe results	100%	100%	89%	100%	100%	100%	100%
Final Visual Clearance Form - 14(e)	Visual Clearance form completed for final passing dust wipe results	100%	100%	89%	100%	100%	0%	100%
Passing Dust Wipe Results - 14(e)	Final passing dust wipe results	100%	100%	89%	100%	100%	100%	0%
DW Vendor Certifications - 14(e)	ELLAP and NLLAP Certifications	25%	100%	89%	100%	100%	100%	100%

Indicator	Evidence of Compliance (in Maximo or Smartsheet)	BBM	BLV	EAS	EDW	MVL	RPR	SWN
Abatement Report - 14(f)	Completion of Abatement Report	100%	100%	22%	100%	100%	100%	100%
Notice of Hazard Reduction - 14(g)	Notice produced for each abated occupied unit and common area ⁷	100%	0%	N/A	N/A	100%	100%	N/A

Field Monitoring for Paragraph 8:

NYCHA continued using STV Inc. as a third-party environmental monitoring firm to oversee compliance with lead abatement and clearance requirements at PACT sites.

During this reporting period, STV did not conduct any field observations at Williamsburg Houses or Harlem River Houses. Abatement of units and interior common areas at both developments was completed in a prior reporting period, and no new abatement or clearance activities occurred during the current cycle. As a result, no abatement or clearance observations were performed at these sites during this reporting period.

A complete list of STV’s field monitoring observation results for applicable PACT sites is included in Attachment J.

Other Converted RAD/PACT Developments:

The following RAD/PACT developments have reported that abatement in apartment units has been completed: Union Avenue Consolidated, and Audubon, Bethune, and Marshall (“ABM”). During this reporting period, REDD reported one new lead-based paint–related issue at a converted RAD/PACT development, Reid Park Rock. In addition, NYCHA is providing a status update on a previously reported issue at Linden. The Compliance Department continues to coordinate with REDD, PACT Partners, and contractors to address outstanding items and ensure alignment with regulatory standards.

Linden (Status Update)

At Linden, 27 apartments were previously identified in connection with bathroom renovations completed in 2022, during which chair rails that had tested positive for lead-based paint were removed as part of broader renovation activities. As previously reported, this work was not documented as formal lead abatement and required regulatory documentation was incomplete.

⁷ Cases for vacant units are not required to have a NOHR. They are reported as “N/A” in the table. Find Attachment I for a further breakdown.

For the current reporting period, NYCHA is providing a status update on these 27 units. As reported in the prior certification, lead dust risk assessments were completed in 19 of the 27 units, and all results were negative for lead dust hazards.

During this reporting period, second XRF testing was conducted in 18 of the 27 units. All XRF testing completed during this reporting period showed no lead-based paint.

At this time, lead-based paint inspections, including second XRF testing, remain incomplete in 9 of the 27 units, including one unit where access has been formally refused. In addition, lead dust risk assessments remain outstanding in 8 units. The PACT Partner continues outreach efforts to obtain access through phone calls, notices under the door, and certified mail.

Reid Park Rock

During an August 2025 site visit, STV identified a documentation deficiency associated with the contractor assigned to perform exterior lead abatement work on the fire escapes. The firm-level EPA Lead Abatement certification available on site did not match the contractor identified for the work, resulting in a documentation mismatch. No abatement work had commenced at the time of this inspection, and the contractor was subsequently removed from the project.

VIII. Conclusions and Next Steps

The Compliance Department continuously monitors NYCHA's lead practices. The next Lead Certification Report is scheduled for publication in July 2026. NYCHA and Compliance will track the following areas to improve:

- 14(d): Presence of dust wipe methodologies in abatement work orders for occupied units.
- 14(g): Maintenance of property management offices' lead disclosure files.
- 14(g): Maintenance of lead documents within tenant folders.
- 15(a): Accuracy of RRP workers' response to the Maximo prompt, "Are you Performing RRP?" and RRP checklists.
- 15(b, f, h, i, j): IT controls on vendor recordkeeping and document distribution to allow for proper tracking of vendor RRP procedure compliance.
- 15(d): Management of RRP supplies in storerooms.
- 15(e): Accuracy and completion of renovator checklist for RRP jobs.
- 15(g): Distribution and timing of distribution of NOHRs and NOEs.
- 15(j): Timing of initial clearance examinations and performance of re-clearance examinations.
- 15(j): Worksite protections after cleaning but pending final clearance results.
- Monitor the completion of exterior common area abatement at Williamsburg.