

NYCHA Compliance Department:
15th 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 December 1, 2025 to May 31, 2026

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I. Summary of Compliance in July 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 five (5) years of the Agreement. Both sites were converted to the Permanent Affordability Commitment Together (“PACT”) Program. As of May 31, 2026, NYCHA’s Real Estate Development Department (“REDD”) is reporting that the PACT partners have completed the interior abatements at both properties, except for one (1) 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. The PACT partner has since begun completing all exterior abatements, NYCHA is awaiting submission of all clearance reporting.

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 May 31, 2026, NYCHA abated and cleared approximately 19,948 units out of approximately 62,297 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 May 31, 2026, 4,726 units out of approximately 6,860 units requiring abatement (69%) had been reported as abated and cleared among the PACT sites that closed after January 2020.

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).

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

Summary of Compliance in January 2026 Publication and July 2026 Publication

Paragraph Section	Compliance in January 2026 Publication	Explanation of non-compliant findings	Compliance in July 2026 Publication (Current)	Explanation of non-compliant findings ²
14a	Yes		Yes	
14b	Yes		Yes	
14c	Yes		Yes	
14d	No	Occupied Units: 91% <i>Work orders did not contain dust wipe methodologies.</i>	Yes	
14e	Yes		Yes	
14f	Yes		Yes	
14g	No	Field Monitoring: <i>Property management lead disclosure files: 71.82%</i> <i>Tenant folder review: 68.82%</i>	No	Field Monitoring: <i>Property management lead disclosure files: 68.48%</i> <i>Tenant folder review: 78.79%</i>
15a	No	Field Monitoring: 94.34% <i>Additional training and supervision are needed to ensure system users are properly following RRP required protocols.</i>	No	Field Monitoring: 93.62% <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: 89.05%	No	Field Monitoring: 87.72%

² NYCHA is currently working with the Federal Monitor and HUD to determine the substantial compliance threshold. For the purposes of this report, “compliance” is defined as 98% and above.

Paragraph Section	Compliance in January 2026 Publication	Explanation of non-compliant findings	Compliance in July 2026 Publication (Current)	Explanation of non-compliant findings ²
		<i>Storeroom inspection for RRP supplies increased in compliance from 83.57% in the July 2025 Lead Certification.</i>		<i>Storeroom inspection for RRP supplies decreased in compliance from 89.05% in the January 2026 Lead Certification.</i>
15e	No	File Review: 96% <i>The renovator checklist needs to be accurate and complete.</i>	No	File Review: 94% <i>The renovator checklist needs to be accurate and complete.</i>
15f	No	Field Monitoring: 97.2% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and document distribution.</i>	No	Field Monitoring: 93.09% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and document distribution.</i>
15g	No	Field Monitoring: 65% for NOEs and 80% for NOHR exception cases - <i>NYCHA needs a period of consistent compliance for NOHRs and NOEs.</i>	Yes	
15h	No	File Review: 96% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>	No	File Review: 94% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>
15i	No	File Review: 96% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>	No	File Review: 94% <i>NYCHA needs to strengthen policies and IT controls on vendor recordkeeping and monitoring.</i>
15j	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</i>	No	File Review: 94.7% <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</i>

Paragraph Section	Compliance in January 2026 Publication	Explanation of non-compliant findings	Compliance in July 2026 Publication (Current)	Explanation of non-compliant findings ²
		<i>institute worksite protections after cleaning but pending final clearance results.</i>		<i>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 July 31, 2026, the Compliance Department conducted a review of NYCHA records and activities for the period between December 1, 2025, and May 31, 2026 ("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 Review:** This reflects EHS's observations of abatement, interim control or RRP work, and if these work orders observed during the Covered Period evidenced compliance with each specific regulatory requirement.
- **Recordkeeping/File Review:** This reflects the Monitoring Unit's evaluation of 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. The body of the report discusses non-compliant field and/or file review results. Details about compliant results are discussed in the Attachment (either EHS report or file review results). The file review data below reflects information available as of June 23, 2026.

III. Updates from EHS

During this Covered Period, EHS escalated seven (7)³ observations to the Office of the Chief Compliance Officer (“CCO”) and LHC for further review. The escalations included one (1) RRP job, one (1) abatement job, one (1) clearance job, and four (4) developments that failed both their initial lead disclosure document inspection and reinspection. Compliance took the following actions in response to the EHS escalations:

- A NYCHA painter disturbed lead-based paint (“LBP”) positive paint without proper wet methods or containment on January 5, 2026. Compliance received the escalation memo on February 10, 2026, and skilled trades issued a counseling memo to the employee on March 19, 2026.
- On December 3, 2025, an abatement vendor performed work area preparation without the presence of the abatement supervisor named on the Notice of Commencement. Compliance received the escalation memo on February 20, 2026. LHC issued a notice of noncompliance to the contractor on March 30, 2026; the vendor then acknowledged the noncompliance and committed to implement corrective actions.
- A vendor did not follow proper dust wipe collection procedures for one (1) of two (2) samples collected during post-abatement dust wipe sampling on May 6, 2026. LHC issued a letter of direction to the vendor, who then committed to re-train their staff. EHS and LHC agreed that re-testing was not necessary.
- A training is scheduled for July 24, 2026, for property management staff at Drew Hamilton, Vladeck, Borinquen Plaza I, and Borinquen Plaza II. The training will provide staff with instructions for compiling a binder for each property in their consolidation and will address 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 Testing and Abatement

As of May 30, 2026, NYCHA completed X-ray fluorescence (“XRF”) lead inspections in 138,592 residential units at the 0.5 mg/cm² standard, which is about 96.5% of the total units to be tested by LHC. Of these, 62,297 units (45%) tested positive for lead-based paint, while 76,295 units (55%) tested negative.

Out of the 62,297 units that tested positive, NYCHA has abated 19,948 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.

³ One (1) additional escalation was issued for an inspection and reinspection of the storeroom at Johnson Houses that found missing 6-millimeter sheeting. The inspections occurred in April and May of 2026, 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.”

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 May 30, 2026, LHC has completed quality assurance for 2,782 units and attempted all remaining units out of the target universe of 3,592 units. Currently, 509 units have been identified as requiring additional work⁵. The majority of these units involve a single component that needs to be abated, which typically requires simpler corrective actions. As of June 30, 2026, NYCHA has abated 306 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.

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 December 1, 2025, to May 31, 2026, there were five (5) capital projects that impacted positive or presumed positive components. For non-public space abatement, there was one (1) boiler room project at Monroe and exterior restoration and/or roofing projects at Bryant Avenue, Morris 1, and Sotomayor. For common area abatement, there was a community center upgrade at Sedgwick.

Abatement during Comprehensive Modernization Projects

During this Covered Period, A&CM’s Comprehensive Modernization (“CompMod”) program and LHC identified a dust clearance issue at a small number of units at CompMod projects. CompMod worked with LHC, Compliance, and the Monitor to institute the appropriate corrective actions and implement necessary internal controls.

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

General Statement

NYCHA Compliance uses two (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 1,014 work orders that had an “Actual Finish” date during the Covered Period and were closed as of May 31, 2026.

⁵ There were 535 units identified for additional work in the January 2026 Certification. LHC conducted additional review and removed 26 units from the QA universe based on additional photographs and notes.

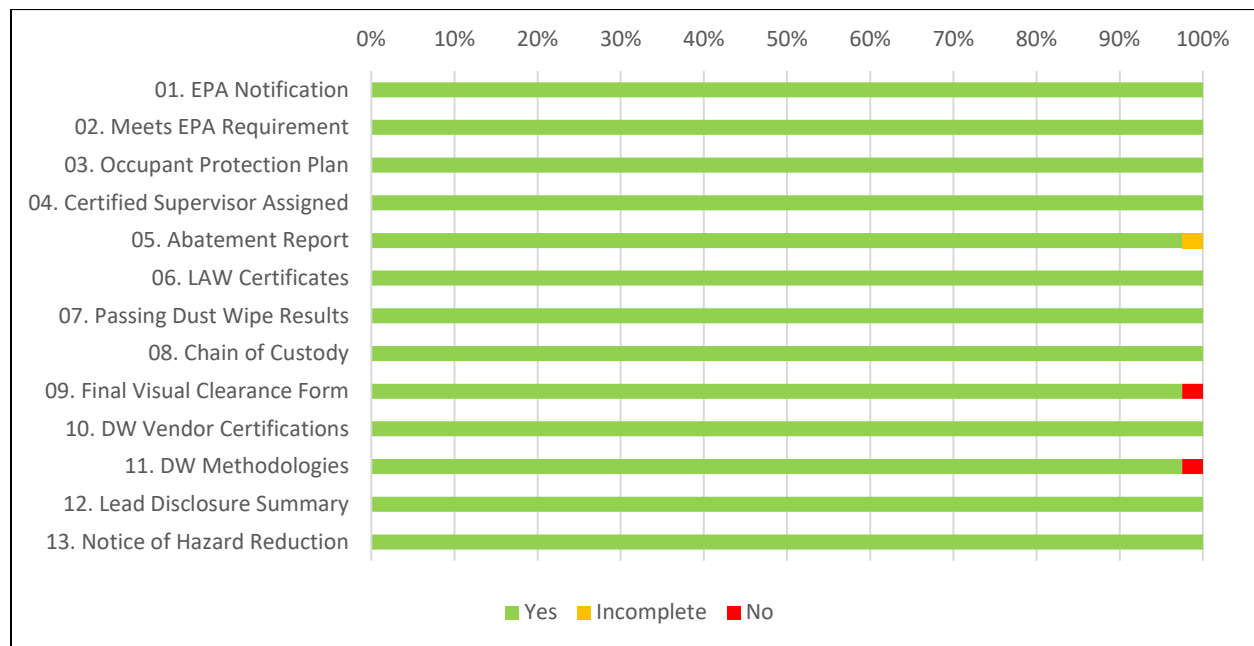
- The MU reviewed all five (5) elevated blood level (“EBLL”) abatements that were completed during the covered period and were cleared and closed by May 31, 2026. The MU selected a random sample of 30 occupied apartments with children under the age of 6 (“CU6”) out of the 240 units that were cleared and 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

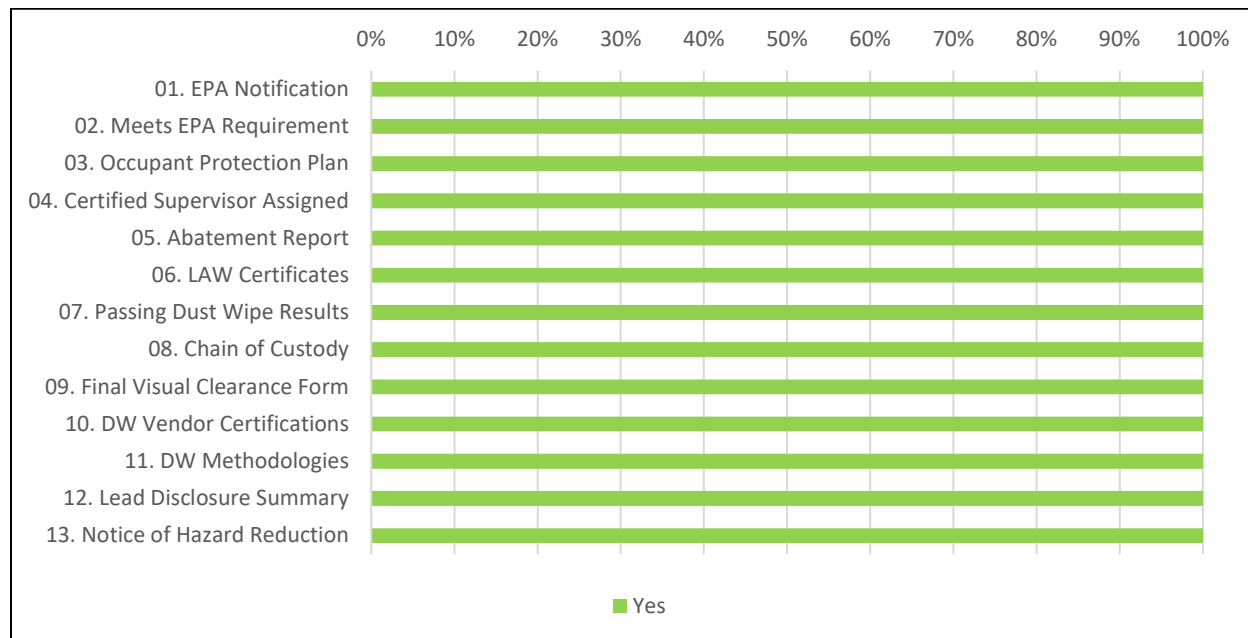
The MU reviewed a sample of 40 total moveouts with an “Actual Finish” date between December 1, 2025, and May 31, 2026, and a work order status of “CLOSE” as of May 31, 2026.



- One (1) of 40 abatement reports listed the name of a supervisor lead abatement worker, on the first page of the report, who was not on site for the abatement work. However, the actual onsite supervisor documented their labor details and signed the report. A copy of the supervisor’s certification was uploaded to the file.
- In addition, one (1) of 40 files was missing the Final Visual Clearance Form and the methodology section. The missing documents were subsequently uploaded by LHC upon request.

Summary of File Review for Abatements Performed in 35 Occupied Units

The MU selected 30 abatements in units abated as part of the TEMPO Abatement Program, which have CU6 occupants, and five (5) EBLI abatements closed during the Covered Period. The results of this review are set forth in Attachment F.



- All 35 abatement cases reviewed met the EPA notification requirement and contained the specified abatement and clearance documents, resulting in an 11.4% improvement over the prior review period.
- Of note, one (1) EBLI occupied unit was listed as vacant in both the Abatement Report and Occupant Protection Plan.⁶

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 monitoring 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 monitoring 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).

⁶ According to LHC, the resident permanently relocated before abatement, so the unit was vacant when abatement work was conducted.

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

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

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

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 monitoring 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 field monitoring 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 by the MU. However, the field observations revealed issues in property managements' recordkeeping, as discussed below.

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

EHS completed 184 inspections with a 68.48% compliance rate for property management lead disclosure files (development binder). EHS completed 165 inspections with a 78.79% 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. Maximo does not currently validate that the correct forms are attached 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 11 contracts to perform abatements and 10 contracts 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/PO No.	Vendor Name	Compliance Requirement	Compliance Determination	Basis
2216332	ABATEMENT UNLIMITED INC	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2425358	ABATEMENT UNLIMITED INC	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2216359	AGD CONTRACTING CORP.	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2425350	AGD CONTRACTING CORP.	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2435000	AIRTEK ENVIRONMENTAL LLC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2108266	THE ALC GROUP LLC DBA ALC ENVIRONMENTAL	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)

Contract/PO No.	Vendor Name	Compliance Requirement	Compliance Determination	Basis
2110330	ATC GROUP SERVICES LLC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2110331	ATHENICA ENVIRONMENTAL SERVICES INC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2216325	EMPIRE CONTROL ABATEMENT INC	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2425356	EMPIRE CONTROL ABATEMENT INC	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2110329	GENESIS ENVIRONMENTAL CONSULTANTS, INC.	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2438221	GENESIS ENVIRONMENTAL CONSULTANTS, INC.	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)

Contract/PO No.	Vendor Name	Compliance Requirement	Compliance Determination	Basis
			under 40 CFR 745 & 24 CFR 35.	
2108127	LEAD BY EXAMPLE ENVIRONMENTAL LLC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2435382	LEAD BY EXAMPLE ENVIRONMENTAL LLC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2216328	LINEAR ENVIRONMENTAL CORP.	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2216340	NEW YORK ENVIRONMENTAL SYSTEMS, INC.	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2425353	NEW YORK ENVIRONMENTAL SYSTEMS, INC.	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)

Contract/PO No.	Vendor Name	Compliance Requirement	Compliance Determination	Basis
2435038	INTERNATIONAL ASBESTOS REMOVAL INC	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2109210	SAI ENVIRONMENTAL CONSULTANTS INC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2435002	UNYSE, LLC	Exhibit A - Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2216340	NEW YORK ENVIRONMENTAL SYSTEMS, INC.	Exhibit A - Para. 14 (Lead Abatement)	Contract language aligns with requirements for lead abatement at 40 CFR 745.	Incorporates by reference Contract Performance Specs for Lead-Based Paint Abatement in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)
2611397	THE ALC GROUP LLC DBA ALC ENVIRONMENTAL	Exhibit A – Paras. 14 & 15 (Clearance Inspections)	Contract language aligns with requirements for clearance inspections under 40 CFR 745 & 24 CFR 35	Incorporates by reference Contract Performance Specs for Lead-Based Paint Clearance Inspections in Occupied and Unoccupied Apartments (Attachment to RFQ/Solicitation)

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 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 91.53% (57,704 out of 63,043) of work orders closed between December 1, 2025, through May 31, 2026, where renovators must answer the RRP enforcement questions, renovators indicated that they were not performing RRP work. 8.27% (5,214 out of 63,043) of the time, renovators did not provide any answer to the RRP question. This trend requires continued monitoring of whether the workers' selection of "No" or "No Components Selected" to the RRP enforcement questions is appropriate.⁷

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

EHS completed 188 inspections with a 93.62% 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 for NYCHA employees, as

⁷ 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."

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 observation results. Field observations revealed issues in maintenance of RRP supplies within storerooms.

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

Out of 114 total storeroom inspections for RRP supplies, 14 failed inspections, resulting in a compliance rate of 87.72%, a decrease from the compliance rate of 89.05% (137 inspections total) in the January 2026 Lead Certification Report. The most frequently missing item was the Renovate Right Pamphlet.

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 observed compliance for NYCHA employees, discussed in Attachment A with a compliance rate of 98.39%, but they 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. 197 of the 210 work orders (94%) had staff that completed the RRP Renovation Checklist. 12 of the 13 remaining work orders had partially completed RRP Renovation Checklists, and one (1) work order lacked any RRP Renovation Checklist entries.

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.

Based on the field monitoring of NYCHA employees during the Covered Period and lacking oversight of vendor work and recordkeeping, the Compliance Department does *not* recommend that NYCHA certify to Paragraph 15(f).

- **Field Monitoring for 15(f)**

With respect to NYCHA's internal staff, EHS completed 188 inspections verifying if the Lead Safe Certified Guide to Renovate Right (NYCHA Form 060.632) was distributed, and found a 93.09% compliance rate. This is a decrease in compliance with the requirements set forth in 15(f) from 97.2% in the previous covered period.

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

Attachments A and G demonstrate compliance based on field monitoring and file review results. A review of the Maximo data shows significant improvement in 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.

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 recordkeeping and monitoring. EHS did not observe any vendors completing RRP work. 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).

The Compliance Department does *not* recommend certifying to this requirement until NYCHA strengthens policies on vendor recordkeeping 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 but did not include vendors in its observations; 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 2,108 of 2,225 (94.7%) clearance examinations (dust wipes). NYCHA completed 1,877 of 2,108 (89.0%) of these clearance examinations within 24 hours of the last labor transaction on the corrective maintenance (“CM”) work order. NYCHA completed 1,973 of 2,108 (93.6%) 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 increased 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 June 17, 2026 for all clearance examinations from December 1, 2025 to May 31, 2026 as shown in the table below.

	DECEMBER	JANUARY	FEBRUARY	MARCH	APRIL	MAY	TOTAL
CAPTURED SAMPLE	0	1	0	3	4	2	10
FAILED DUST WIPE	5	5	0	6	12	7	35
FAILED VISUAL PAINT	35	25	22	40	45	43	210
NEEDS DUST WIPE INSPECTION	4	9	4	7	6	15	45
PASSED	354	377	273	361	322	238	1,925
TOTAL	398	417	299	417	389	305	2,225

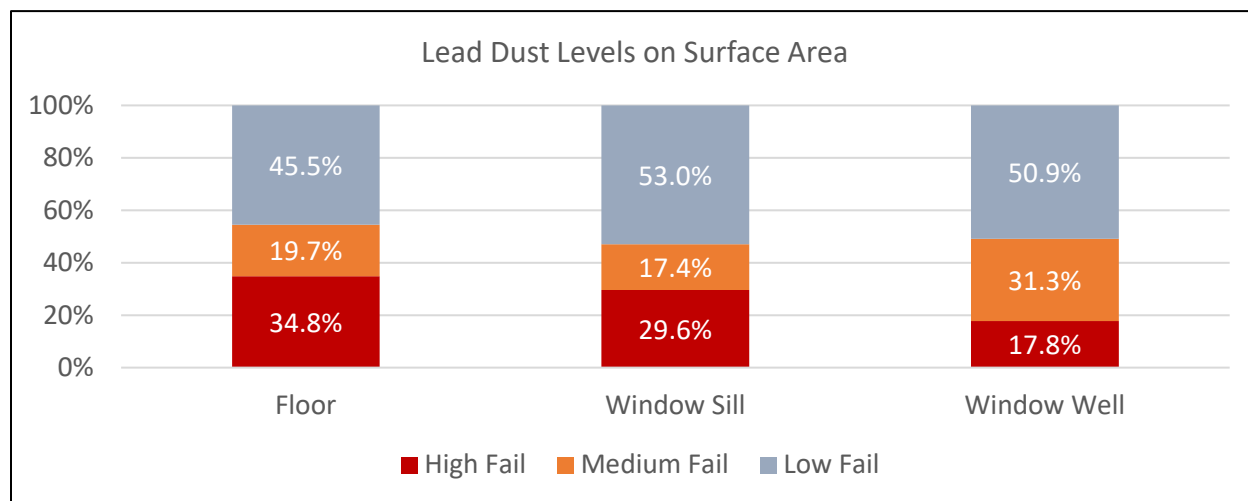
There are still some compliance shortfalls that NYCHA needs to address, as 13.5% of dust wipe clearance examinations are not in passed status.

Over the last three (3) Lead Certification Reports, dust wipes in fail status at the end of the reporting period have steadily increased. 5.3% failed in the July 2025 publication, 9.1% failed in the January 2026 publication, and 11.0% 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 December 1, 2025, to May 31, 2026. 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 30.7% in the January 2026 HUD Certification report to 34.8% in this Certification report. For window sills, the percentage of high fail dust wipes also increased, shifting from 20.4% in the January 2026 HUD Certification report to 29.6% in this Certification report. For window wells, the percentage of high fail dust wipes decreased from 27.1% in the January 2026 Certification report to 17.8% 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 May 31, 2026, REDD is

reporting that the PACT Partner for Harlem River has abated 691 of 692 units (99.9%), with one (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 permitted the use of 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. According to REDD, testing and abatement of the identified exterior areas have been completed, but verification of the clearance documentation for the abated areas remains pending.

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 as of June 5, 2026. NYCHA reviewed documentation for 50 abated and cleared units across seven (7) sites based on the total number of units that had been abated at a site.⁸ 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. REDD is conducting monthly randomized audits of abatement files to ensure that they are complete. The details of the Compliance Department's document review are set forth in Attachment K.

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

⁸ Compliance reviewed files at the following sites: Bay View ("BAY") (13 units reviewed), Boulevard ("BLV") (1 unit reviewed), Eastchester Gardens ("EAS") (11 units reviewed), Edenwald ("EDW") (19 units reviewed), Manhattanville ("MVL") (3 units reviewed), Northwest Bronx Scattered Sites ("NWB") (1 unit reviewed), and Sack Wern ("SWN") (2 units reviewed).

Summary of PACT Abatement Compliance at PACT Properties

Indicator	Evidence of Compliance (in Maximo or Smartsheet)	BAY	BLV	EAS	EDW	MVL	NVB	SWN
Sample size of abatements this Covered Period (as of June 5, 2026)		13 of 71	1 of 4	11 of 55	19 of 104	3 of 16	1 of 2	2 of 9
Certified Supervisor Assigned - 14(a)	Certified lead abatement supervisor assigned to abatement with current certification on file	69%	0%	82%	100%	0%	100%	0%
Lead Abatement Worker ("LAW") Certificates - 14(a)	Certifications on file for each lead abatement worker assigned to abatement	69%	0%	100%	95%	0%	0%	0%
Environmental Protection Agency ("EPA") Notification - 14(b)	EPA was notified of abatement	69%	100%	100%	100%	67%	100%	50%
Meets Five-Day EPA Requirement - 14(b)	EPA must be notified 5 full business days prior to the start of abatement	88%	N/A	100%	100%	N/A	100%	50%
Occupant Protection Plan - 14(c)	Completion of the Occupant Protection Plan	69%	100%	100%	100%	0%	0%	0%
Dust Wipe Methodologies - 14(d)	Specified methods of collection and lab analysis of dust wipes	100%	0%	73%	100%	100%	100%	100%
Chain of Custody - 14(e)	Chain of Custody completed for final passing dust wipe results	100%	0%	73%	100%	100%	100%	100%
Final Visual Clearance Form - 14(e)	Visual Clearance form completed for final passing dust wipe results	100%	0%	73%	100%	100%	100%	100%

Indicator	Evidence of Compliance (in Maximo or Smartsheet)	BAY	BLV	EAS	EDW	MVL	NVB	SWN
Sample size of abatements this Covered Period (as of June 5, 2026)		13 of 71	1 of 4	11 of 55	19 of 104	3 of 16	1 of 2	2 of 9
Passing Dust Wipe Results - 14(e)	Final passing dust wipe results	100%	0%	73%	100%	100%	100%	100%
DW Vendor Certifications - 14(e)	ELLAP and NLLAP Certifications	100%	0%	73%	100%	100%	100%	100%
Abatement Report - 14(f)	Completion of Abatement Report	69%	0%	91%	100%	0%	100%	0%
Notice of Hazard Reduction - 14(g)	Notice produced for each abated occupied unit and common area ⁹	100%	N/A	73%	100%	100%	100%	N/A

Field Monitoring for Paragraph 8:

During this reporting period, REDD's contract with STV Inc., which provided third-party environmental monitoring of lead abatement and clearance activities at PACT sites, ended. LiRo began performing the same functions in March 2026. Neither STV nor LiRo conducted field oversight at Williamsburg Houses or Harlem River Houses during the reporting period. Abatement of units and interior common areas at both developments has been completed, except for one (1) unit at Harlem River Houses. That unit remains pending and is currently subject to legal proceedings to obtain access and complete the required abatement work.

A complete list of STV's and LiRo's field monitoring observation results for applicable PACT sites is included in Attachments J and K.

Other Converted RAD/PACT Developments:

During this reporting period, lead abatement and clearance activities continued at Bay View, Boulevard, Eastchester Gardens, Edenwald, Manhattanville, Northwest Bronx Scattered Sites, and Sack Wern. The Compliance Department continues to coordinate with REDD, PACT Partners, and their contractors to monitor progress, address identified documentation and field-observation issues, and ensure that abatement and clearance activities comply with applicable regulatory requirements. In addition, NYCHA is providing a status update on a previously reported issue at Linden.

⁹ 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.

Linden (Status Update)

At Linden, 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 work. The work was not documented as formal lead abatement, and the required regulatory documentation was incomplete.

REDD reported that the chair rail issue involves 25 apartments, rather than 27, because two (2) units were listed more than once. REDD also reported that XRF testing has been completed in 20 of the 25 units, with all results negative for lead-based paint. According to REDD, the PACT Partner has not yet been able to access the remaining five (5) units and is working with Resident Engagement to coordinate with residents and obtain access.

VIII. Conclusions and Next Steps

The Compliance Department continuously monitors NYCHA's lead practices. The next Lead Certification Report is scheduled for publication in January 2027. NYCHA and Compliance will track the following areas to improve:

- 14(g): Maintenance of property management offices' lead disclosure files.
- 14(g): Maintenance of lead documents within tenant folders.
- 15(a): Improve IT controls to ensure 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(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.