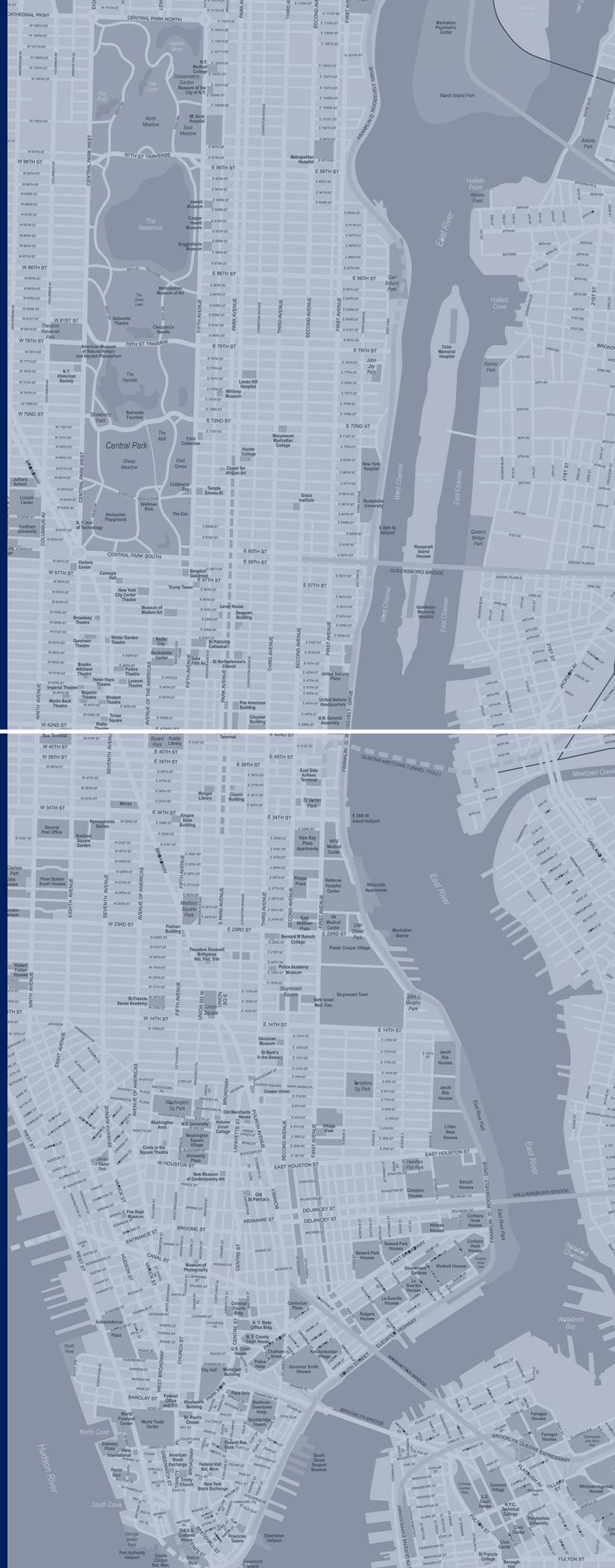


New York City Housing Authority Monitorship

Monitors' Report
April 3, 2025

Neil M. Barofsky and Matthew D. Cipolla
Jenner & Block LLP
1155 Avenue of the Americas
New York, New York 10036

www.nychamonitor.com



EXECUTIVE SUMMARY..... 1

SECTION I: PROPERTY MANAGEMENT 11

I.1 Heat..... 13

A. NYCHA’s Boiler Replacements (Requirement No. H1)..... 14

B. Mandatory Minimum Indoor Temperature Violations and
Accompanying Action Plan (Requirement Nos. H6-H8)..... 14

C. Heat Demand Variation..... 15

D. Heat Restoration Obligations (Requirement Nos. H9 and H11)..... 15

E. Heating Failure Investigations (Requirement No. H14)..... 18

F. Electronic Temperature Monitoring (Requirement Nos. H4, H5,
H15) 19

G. Completed, In Compliance, and Superseded Obligations 20

I.2 Elevators 27

A. Elevator Replacements (Requirement Nos. E1 -E2) 28

B. No-Service Conditions (Requirement Nos. E7-E8, E15-E16, E20,
E22)..... 29

1. Frequency of No-Service Conditions (Requirement Nos.
E7-E8) 29

a. No More Than One No-Service Condition Per Year
(Requirement No. E7) 29

b. No More Than Three No-Service Conditions Per
Year (Requirement No. E8)..... 30

2. Duration of No-Service Conditions (Requirement Nos. E15-
E16)..... 30

a. Four-Hour No-Service Resolution Obligation
(Requirement No. E15)..... 31

b. Twelve-Hour No-Service Resolution Obligation
(Requirement No. E16)..... 31

3. Timing of No-Service Conditions and Providing Advance
Notice to Residents (Requirement Nos. E20, E22) 32

C. Elevator Car Outages (Requirement Nos. E10, E12, E17-E19)..... 34

1. Frequency of Unplanned Elevator Car Outages
(Requirement Nos. E10, E12)..... 35

	a.	No More Than Eight Unplanned Outages (Requirement No. E10).....	35
	b.	No More Than Twelve Unplanned Outages (Requirement No. E12).....	35
	2.	Duration of Elevator Car Outages (Requirement Nos. E17- E19).....	36
	a.	Percentage Reduction in Outage Duration (Requirement No. E17).....	36
	b.	Ten-Hour Outage Obligation (Requirement No. E18).....	38
	c.	Eighteen-Hour Outage Obligation (Requirement No. E19) 39	
	D.	Remote Elevator Monitoring (Requirement No. E5).....	39
	E.	Completed and In Compliance Obligations.....	40
I.3		Pests & Waste	48
	A.	Pest Population Reporting and Reduction Requirements (Requirement Nos. P7-P11)	49
	1.	Pest Population Protocols.....	49
	2.	Publish Pest Population Estimates	51
	3.	Reduce Pest Populations	53
	B.	Respond to Resident Pest Complaints (Requirement Nos. P14- P15).....	55
	1.	Respond to Rat Complaints (Requirement No. P14).....	56
	2.	Respond to Other Pest Complaints (Requirement No. P15).....	57
	C.	Address Pest Complaints from Residents with Health Conditions in an Expedited Manner (Requirement No. P17).....	58
	D.	Implemented Integrated Pest Management Practices (Requirement Nos. P16, P18-P19).....	60
	1.	Apply Effective Pest Control Methods in a Timely Manner (Requirement No. P16)	60
	2.	Implement and Apply Integrated Pest Management Techniques.....	61
	3.	Address Common Area Pest Complaints	62
	E.	Improve Waste Management (Requirement No. P11).....	63
	1.	Inspect and Correct Negative Waste Conditions.....	63
	2.	Implement Waste Management Capital Projects.....	65

F.	Completed, In Compliance, and Superseded Obligations	65
I.4	Mold & Leaks.....	71
A.	Timely Remediation of Mold and Leaks (Requirements Nos. M5-M7).....	73
1.	Removal and Remediation of Mold (Requirement No. M6)	73
a.	Blended Rate	73
b.	Mold Removal	75
c.	Simple Repairs.....	75
d.	Complex Repairs.....	76
e.	Mold and Leak Work Order Backlog.....	77
2.	Work Plan Distribution (Requirement No. M5).....	78
3.	Abating Floods, Leaks from Above, and Other Moisture Conditions (Requirement No. M7).....	79
B.	Prevention of Mold Growth and Recurrence (Requirements Nos. M2-M4)	81
1.	Recurrence of Verified Mold Complaints (Requirement No. M2).....	81
2.	Existence of Large Mold Growths (Requirement No. M3)	82
3.	Recurrence of Mold (Requirement No. M4).....	84
4.	Initiatives to Address Mold Growth and Recurrence	84
a.	Mold Trainings	85
b.	Mold Related Capital Projects.....	86
i.	Comprehensive Modernization.....	86
ii.	Building Line Initiative	87
C.	Compliance with <i>Baez</i> (Requirement No. M2).....	89
D.	Completed and In Compliance Obligations.....	90
I.5	Lead.....	94
A.	Testing and Abatement Progress in Apartments (Requirement Nos. L6, L20-L22).....	95
1.	XRF Testing in Apartments	95
2.	Abatement in Apartments	98
B.	Complying with Elevated Blood Lead Level Obligations (Requirement Nos. L23-L25).....	100

1.	EBLL Obligations.....	100
2.	Abatement of Childcare Centers in Connection with EBLLS.....	101
C.	Conducting Visual Assessments and Remediating Identified Paint Deficiencies (Requirement Nos. L28-L29).....	104
D.	Conducting Risk Assessment Reevaluations (Requirement No. L30).....	106
E.	Ensuring PACT Partner Compliance with Abatement Requirements (Requirements Nos. L6, L20-22, L36) (abatement deadlines); (Requirement No. L.26) (regulatory requirements for conducting abatement).....	107
F.	Completed, In Compliance, and Superseded Obligations	109
I.6	Inspections.....	117
A.	HUD’s Guidance and Standards (Requirement Nos. I5 and 17).....	118
1.	NSPIRE Results.....	118
2.	Commonly Identified Deficiencies During HUD Inspections	119
3.	Lowest Performing Properties.....	120
B.	Annual Inspections Action Plan (Requirement No. II)	121
C.	Annual Self-Inspections (Requirement No. I3).....	121
1.	Inspections Completed	121
a.	Inspection Attempts.....	122
b.	Resident Communication.....	123
2.	Commonly Identified Deficiencies During Annual Inspections.....	124
D.	Repairs of Deficiencies (Requirement No. I4)	124
1.	Minor Repairs.....	124
a.	Documentation of Repairs Completed	125
b.	Oversight of Repairs Deferred.....	126
2.	High-Priority Repairs	126
E.	Completed, In Compliance, and Superseded Obligations	127
SECTION II:	ORGANIZATIONAL CHANGE.....	135
A.	Key Areas Update.....	137
1.	Neighborhood Model.....	137
2.	Work Order Reform	139

3. Performance and Accountability.....	140
4. Training	141
B. Transformation Plan Milestones.....	142
SECTION III: THE MONITORS' BUDGET AND ENGAGEMENT WITH STAKEHOLDERS	175
A. Monitorship Budget	177
B. Stakeholder Engagement.....	180
ENDNOTES.....	183
APPENDIX.....	197
GLOSSARY.....	199

EXECUTIVE SUMMARY

On January 31, 2019, the New York City Housing Authority (“NYCHA”) committed to implementing essential reforms to improve housing conditions for NYCHA residents through an agreement (the “HUD Agreement” or “Agreement”) with the U.S. Attorney’s Office for the Southern District of New York (“SDNY”), the U.S. Department of Housing and Urban Development (“HUD”), and the City of New York (the “City”). As part of the terms, a monitor was appointed to oversee and evaluate adherence to the Agreement. After the First Monitor completed a five-year term, on February 28, 2024, the current co-Monitors (“Monitors”), Neil Barofsky and Matthew Cipolla of Jenner & Block LLP, began their five-year term. This is their third report.

In their prior reports, available on the Monitors’ [website](#), the Monitors detailed their assessment of NYCHA’s compliance with the HUD Agreement, including NYCHA’s successes and challenges. In this report, and in others going forward, the Monitors provide regular updates on NYCHA’s progress in meeting those requirements. This report includes annual data for January 31, 2024, to January 31, 2025, the sixth year of the monitorship. As set forth in the report and summarized here, NYCHA continues to make progress to better its performance under the HUD Agreement, but there is still much room for improvement.

The Monitors recognize and thank those who are working to improve NYCHA and help it fully meet its obligations under the HUD Agreement. In particular, the Monitors have continued to benefit from the constructive and collaborative approach taken by NYCHA’s leadership and staff; the important feedback received from the numerous NYCHA residents and resident leaders who have taken time to engage with the Monitors; and the expertise and engagement from HUD, SDNY, and other stakeholders.

Property Management

NYCHA committed in the Agreement to various obligations related to heat, elevators, pests and waste, lead, mold, and inspections. Further detail concerning these topics is contained in **Section I** of this report. As described further in that section, NYCHA has achieved significant milestones in the past year, including:

- Heat. NYCHA replaced 138 boilers by the end of December 2024, exceeding the Agreement's requirement that it replace 133 by that time.
- Elevators. NYCHA reduced the frequency and duration of no-service conditions and elevator car outages across its developments, for the first time surpassing its obligation to resolve at least 85% of elevator car outages within ten hours of learning of them.
- Pests. NYCHA significantly improved its response time to all pest complaints in Year 6. Notably, NYCHA reached a significant milestone by meeting for the first time the HUD Agreement's requirement that it respond to 90% of rat complaints within two business days. NYCHA was able to accomplish this goal 97% of the time, a significant improvement over prior years' performance.
- Lead. NYCHA reached the important milestones of conducting XRF testing (a testing technique that uses X-rays to determine whether lead is present in paint) in over 100,000 apartments and abating over 12,000 total apartments, keeping it on track to meet NYCHA's obligation to abate 50% of apartments known to have lead-based paint by 2029.

At the same time, as detailed further in this report, there are several notable areas requiring continued focus from NYCHA including the following:

- Mold. Although NYCHA continues to make progress in some areas, such as reductions in mold complaints, NYCHA remains substantially out of compliance with several mold and leak requirements, with its performance decreasing in some critical areas. For example, the HUD Agreement requires NYCHA to remove or remediate mold and its root cause(s) within specified time frames 95% of the time. In Year 6, NYCHA met this requirement only 9% of the time, down from 11% of the time in Year 5. To improve its performance, NYCHA, with the Monitors, HUD, and SDNY, is developing an initiative that prioritizes addressing the

oldest mold and leak work orders in the highest-need apartments. The Monitors will provide an update on what should prove to be an important and impactful project in future reporting.

- Lead. Over the last four months of Year 6, NYCHA saw an increase in elevated blood lead level reports in childcare centers on its properties, which may be attributable to a regulatory change lowering the elevated blood level threshold for mandatory intervention. NYCHA acted promptly and comprehensively to address those reports, including by testing and abating the affected childcare centers in their entirety. In Year 7, NYCHA has committed to developing a plan for testing the remaining childcare centers on its properties to identify those needing abatement, but is not planning on beginning testing until late 2025, at the earliest. The Monitors urge NYCHA to assess the highest risk childcare centers early in the planning process and to accelerate testing in Year 7. It will be critically important that NYCHA continues to comply with visual assessment and interim control requirements in childcare centers while the testing plan is being developed and implemented. Finally, the Monitors have asked NYCHA, and NYCHA has agreed, to proactively consider any common areas and exteriors that may pose heightened risks to children, such as playgrounds, as it develops its testing and abatement plans.
- Inspections. Of the 138 NYCHA developments inspected for compliance with HUD's new physical condition standards this year, 75 (54%) of developments failed their inspections. Although this is an improvement over last year, when 85% failed inspections, there is still much more work to do to ensure NYCHA buildings meet HUD's requirements.

As noted in the Monitors' previous reports, there have been key areas where NYCHA was not measuring its compliance with the Agreement's requirements. Important progress has been made in these areas.

For example, with respect to NYCHA's pest management obligations, the Monitors, in consultation with NYCHA, finalized protocols pursuant to which NYCHA will produce pest population estimates for each development at least quarterly as required by the HUD Agreement. Using the protocols, the Monitors were able to determine whether NYCHA reduced the agency-wide rat, mouse, cockroach, and bed bug populations by certain percentages by the end of Year 5 as required under the Agreement. The protocols indicated that NYCHA met the Year 5 reduction requirements for cockroaches, mice, and bed bugs by Year 6, an important accomplishment. Although NYCHA has not yet met the Year 5 reduction requirement for rats, the agency made considerable progress in Year 6, improving the rat reduction rate dramatically from Year 5.

For other areas requiring additional work to measure progress, the Monitors are continuing to work with NYCHA. For example, with respect to NYCHA's obligations to provide adequate heat to residents throughout the heating season, NYCHA lacks a reliable means of directly measuring in-apartment heating performance. To address this, the Monitors are working with NYCHA, HUD, and SDNY to develop a new methodology based on residents' heat complaints and the work order data NYCHA generates when responding to those complaints.

In all, the Monitors continue to closely observe NYCHA's activity in all these areas, and the others detailed further in this report, and will continue to work with NYCHA on improvements.

Organizational Change

NYCHA committed under the HUD Agreement to change its management, organizational, and workforce structure, in a manner to ensure sustained compliance with the Agreement's requirements. In turn, NYCHA adopted a Transformation Plan to achieve these goals. Further detail concerning these topics is contained in **Section II** of this report.

As detailed in that section, NYCHA has taken important steps toward providing stronger training and accountability for its workforce, overhauling the programming for caretakers' daily "muster" meetings in order to offer more on-the-job training and guidance, developing new and more comprehensive training for

maintenance workers, giving the operating departments a greater role in the development of training materials, and instituting performance reviews for managerial employees. NYCHA also worked with the Monitors to better measure the frequency of missed appointments for in-apartment repairs with an aim to improve communications about these appointments and reduce the waste of workers' and residents' time that missed appointments create.

But here too, there is still much to be done. A key principle of NYCHA's transformation as an organization relies on the Neighborhood Model, aimed at decentralizing management so that properties can respond to residents' needs adeptly without the need to resort to central-office services. However, by the end of Year 6, many of NYCHA's core functions remain centralized and many NYCHA developments lack local resources and decision-making input on key processes. In addition, much of NYCHA's work in promoting greater accountability for its workforce remains unfinished, including developing an initial plan for instituting performance evaluations for its broader non-managerial workforce, which includes nearly all of its Property Management staff. Finally, a number of key systems and technology overhauls that are central to NYCHA's transformation, including a new HR system and a resident case management system, have faced numerous delays in their roll-out.

In order to clearly measure NYCHA's efforts to effect organizational change going forward, **Section II** outlines the current status of the 47 initiatives that NYCHA proposed in its Transformation Plan.

Capital Expenditures

Since the Monitors' December 2024 Report, the Monitors continue to track NYCHA's management of City Capital Action Plan ("CCAP") funding under the HUD Agreement. NYCHA anticipates receiving an additional \$200 million in CCAP funds from the City this year, bringing the total funding under the Agreement to \$1.6 billion. As of January 31, 2025, the amount spent or contracted remains unchanged since our last report—NYCHA has spent approximately \$300 million and has contracts in place for approximately \$1.1 billion. The Monitors' ongoing review includes tracking project progress, conducting site visits, examining delays and associated expenditures,

and regularly meeting with NYCHA's Asset & Capital Management team.

Monitors' Budget and Stakeholder Engagement

Section III of this report describes in detail the \$18,954,717 budget for work on the monitorship and also summarizes the Monitors' engagement with residents and other stakeholders since the Monitors' December 2024 Report.

* * *

Pursuant to Paragraph 28 of the HUD Agreement, NYCHA does not yet meet the criteria for termination. Further detail is set forth in the remainder of the report.

**SECTION I:
PROPERTY MANAGEMENT**

I.1 Heat

The HUD Agreement requires NYCHA to improve heating conditions for NYCHA residents through a variety of measures, such as (1) replacing a specified number of boilers, (2) establishing systems for responding to apartments affected by heating failures, (3) investigating failures to timely restore heat, (4) notifying residents of **heating outages**, (5) monitoring the temperature in apartments, and (6) reducing the number of heating failures experienced by residents.¹

Because the 2024-2025 heating season will not be complete until May 31, 2025, the Monitors report here on NYCHA's progress between October 1, 2024, and January 31, 2025, or half of the heating season. Over this time period, NYCHA has made progress in several areas. Notably, NYCHA has met its requirement to replace 133 boilers by the end of 2024, completing 138 boilers by the end of December 2024. Additionally, NYCHA resolves 91% of heating outages within 12 hours and 100% of heating outages within 24 hours.

While NYCHA is making progress, it is still not measuring or reporting on its heating performance related to individual-apartment heating failures. Because NYCHA lacks reliable temperature sensors across its developments, an alternative method of assessing NYCHA's in-apartment heating performance is necessary to assess NYCHA's compliance with certain heating obligations as they apply to heating failures in individual apartments. To address this, the Monitors are working with HUD, SDNY, and NYCHA to develop a new methodology to measure in-apartment heating performance based on residents' heat complaints and the work order data NYCHA generates when responding to those complaints. NYCHA has also submitted an amended proposal regarding its obligations to provide and restore heat in individual apartments, which the Monitors are reviewing and will discuss with HUD, SDNY, and NYCHA.

The Monitors will continue to track and support NYCHA's efforts to meet its outstanding obligations, focusing on efforts to strengthen maintenance processes, improve data systems, effectively measure and report on performance related to in-apartment heating failures, and encourage staff to manage both preventive and corrective maintenance efficiently and thoroughly, thereby reducing

Heating Outage: A failure of the central heating system that prevents the system from delivering heat to multiple apartments. It does not include instances when heat is not being provided to an individual apartment, such as when a single radiator malfunctions.

the risk of heating failures, and will provide updates in future reporting.

A. NYCHA's Boiler Replacements (Requirement No. H1)

The HUD Agreement requires NYCHA to replace 297 boilers by December 31, 2026, with an interim obligation to replace 133 boilers by the end of 2024.² NYCHA met this interim obligation by completing 138 boilers by December 31, 2024. Completing the remaining 159 boiler replacements on schedule by the December 31, 2026 deadline will require NYCHA to replace an average of slightly more than seven boilers per month.

B. Mandatory Minimum Indoor Temperature Violations and Accompanying Action Plan (Requirement Nos. H6-H8)

The HUD Agreement requires NYCHA to create a plan to monitor apartment temperatures and ensure apartments stay above the **mandatory minimum temperatures** required by the New York City Code during the heating season.³ Beginning with the 2024-2025 heating season, the Agreement sets limits on in-apartment heating failures—instances where an apartment's temperature falls below the mandatory minimum indoor temperature.⁴ Specifically, no more than 15% of occupied apartments may experience instances where temperatures fall below the legal minimum, and no apartment may experience more than three instances where temperatures fall below the legal minimum.⁵ The Agreement specifies that NYCHA's compliance with these obligations will be assessed according to procedures agreed upon in an action plan.⁶

Mandatory Minimum

Temperature: From October 1 to May 31 (the "Heating Season"), during the day (6:00 a.m. to 10:00 p.m.), apartments must be at least 68°F when the outside temperature is below 55°F, and at least 62°F at night (10:00 p.m. to 6:00 a.m.) regardless of the outside temperature.

At the time of the Monitors' August 2024 Report, NYCHA submitted a proposed plan to the Monitors describing how it would measure compliance with the HUD Agreement's temperature monitoring and in-apartment heating restoration obligations.⁷ Since then, the Monitors have worked with NYCHA to develop a methodology based on residents' heat complaints and the work order data NYCHA generates when responding to those complaints, and the Monitors are discussing this methodology with the parties. NYCHA has also provided an amended proposal regarding its obligations to provide and restore heat in individual apartments, which the Monitors are reviewing. The Monitors are working with NYCHA, HUD, and SDNY to establish a reliable method for tracking

apartment temperatures and assessing NYCHA's performance regarding in-apartment heating failures.

C. Heat Demand Variation

Before reporting on NYCHA's remaining heat-related obligations, the Monitors provide context regarding how the outdoor temperatures during the 2023-2024 and 2024-2025 heating seasons have compared, and more specifically how those outdoor temperatures have impacted demand for heating.

A commonly accepted way to measure the demand for heat placed upon a heating system is through **Heating Degree Days ("HDDs")**.⁸ HDDs measure the extent to which outside temperatures fall below a baseline, and therefore, increase the corresponding heating demand. HDDs are calculated by determining the difference between 65°F (the average minimum temperature requirement) and the average daily temperature for each day when the average temperature is below 65°F.⁹ The HDD value for a given month is cumulative and is calculated by totaling the HDD value of each day. The colder the weather, the higher the HDDs, meaning heating demand increases to keep apartments warm. Importantly, NYCHA's commitments under the HUD Agreement are not predicated upon achieving performance relative to HDDs; rather, this information provides context for differences between years in the demand for heating, which could influence, among other things, how residents may experience a heating outage or the time it takes to restore heat.¹⁰

Heating Degree Days:

A measure of how cold it is over a period of time, calculated based on the number of degrees the daily average temperature falls below a set baseline (typically 65°F). Higher HDD values indicate greater demand for heat.

In general, temperatures have been slightly colder through January of this winter compared to the period through January of last winter. From October 2023 to January 2024, there were 2,171.7 HDDs. From October 2024 to January 2025, there were 2,327.3 HDDs. In other words, through January 31, 2025, the current heating season has been slightly colder and has had approximately 7% greater heating demand than the prior heating season.

D. Heat Restoration Obligations (Requirement Nos. H9 and H11)

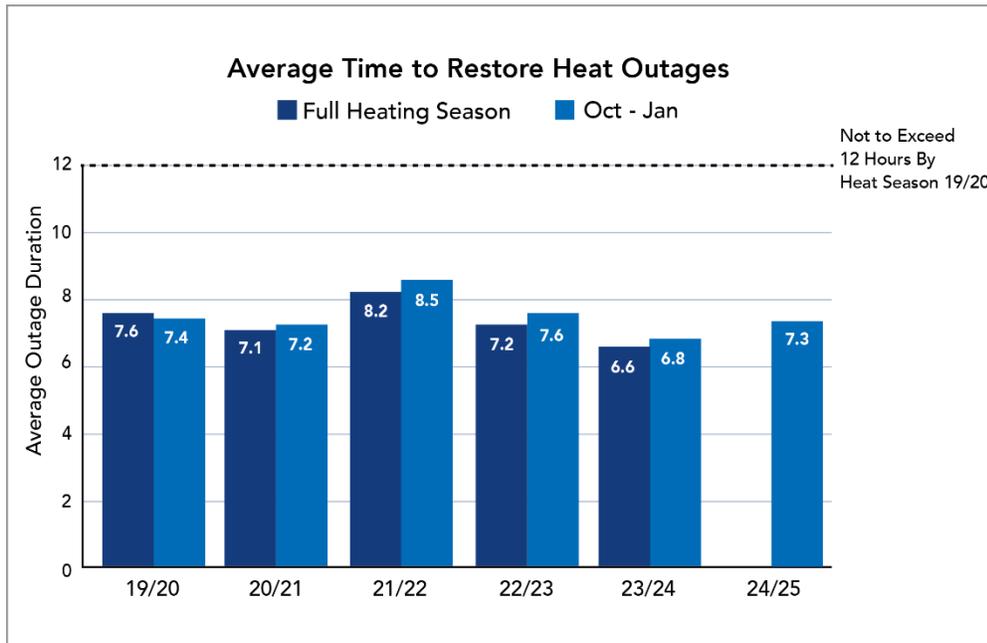
The HUD Agreement requires NYCHA to restore heat in a timely manner when an apartment loses heat. Since its inception, the Agreement has required NYCHA to restore heat to affected

apartments, on average, within 12 hours.¹¹ Beginning with the 2024-2025 heating season, the Agreement requires NYCHA to restore heat to 85% of apartments within 12 hours, and to restore heat to 100% of apartments within 24 hours.¹²

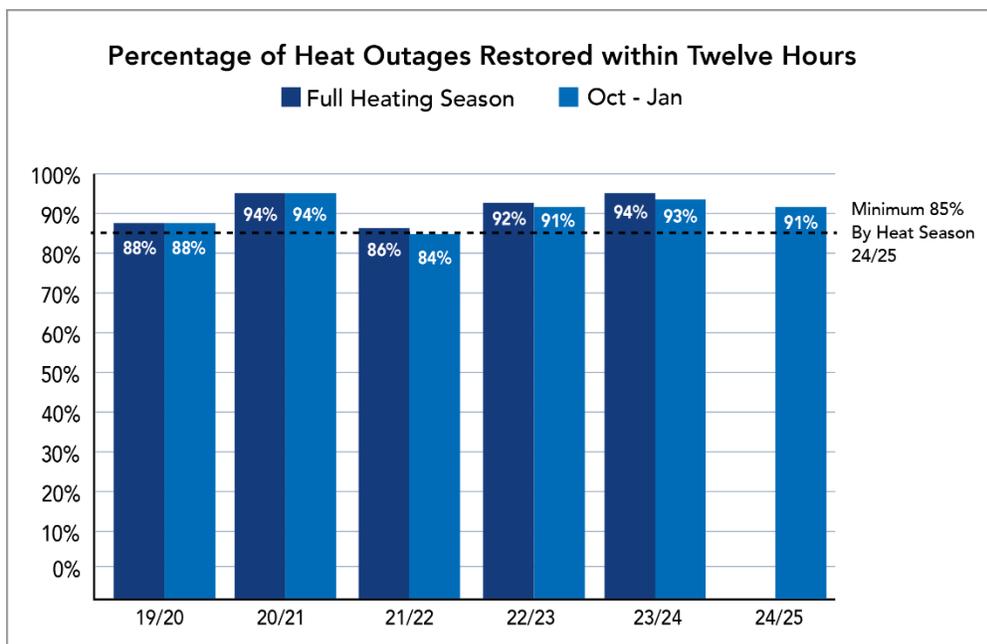
These requirements apply to all heating failures—in-apartment heating failures and systemwide outages affecting multiple apartments within the same building.¹³ As noted above in **Section I.1.B**, the Monitors are working with NYCHA to develop a plan to measure NYCHA's performance in restoring heat to individual apartments experiencing isolated heating failures. In the meantime, the Monitors continue to report on NYCHA's performance regarding heating outages.

Although the HUD Agreement does not contain a specific obligation regarding the number of heating outages, the Monitors have observed a notable increase in the number of outages during the current heating season compared to the previous one. The Monitors will further examine the underlying causes of this uptick and provide a more comprehensive assessment at the end of the heating season.

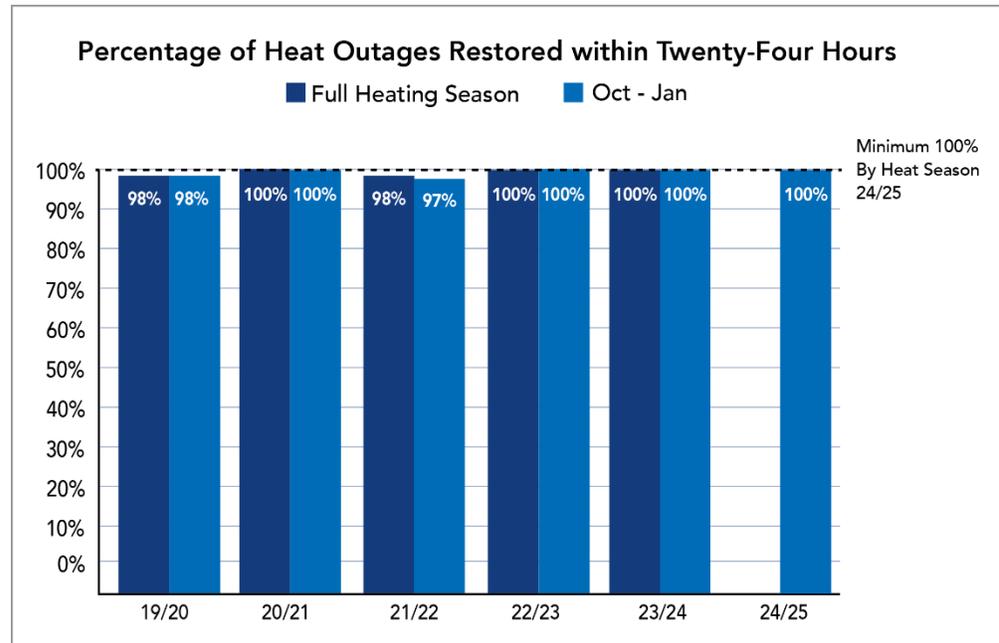
12-Hour Average Heat Restoration. Beginning with the 2019-2020 heating season, the HUD Agreement requires NYCHA to resolve heating outages and in-apartment heating failures in an average of 12 hours.¹⁴ Based on data through January 31, 2025, NYCHA is meeting this requirement for heating outages affecting multiple apartments, as illustrated in the graph below.



12-Hour Heat Restoration. Beginning with the 2024-2025 heating season, the HUD Agreement requires NYCHA to restore heat to 85% of apartments within 12 hours.¹⁵ As of January 31, 2025, NYCHA is on track to meet this obligation for heating outages, as illustrated in the graph below. In the first half of this heating season, NYCHA resolved 91% of heating outages within 12 hours.



24-Hour Heat Restoration. The HUD Agreement also requires NYCHA to resolve 100% of heating failures within 24 hours beginning with the 2024–2025 heating season.¹⁶ As of January 31, 2025, NYCHA is on track to meet this obligation for heating outages, as illustrated in the graph below. In the first half of this heating season, NYCHA resolved 100% of heating outages within 24 hours, consistent with its performance in the last two heating seasons.



E. Heating Failure Investigations (Requirement No. H14)

The HUD Agreement requires NYCHA to investigate and report on instances when it takes more than 12 hours to restore heat to a particular apartment.¹⁷ NYCHA’s Environmental Health and Safety (“EH&S”) Department conducts root cause failure analysis investigations for heating outages that impact multiple apartments lasting more than 12 hours and issues recommended corrective actions, but does not presently conduct or report on investigations of 12-plus hour heating failures that impact individual apartments.¹⁸ NYCHA’s amended proposal, mentioned in **Section I.1.B** above, also addresses the agency’s obligation to investigate heating failures of more than 12 hours in individual apartments.

As of January 31, 2025, NYCHA has had 18 heating outages that have lasted longer than 12 hours for which EH&S is conducting root cause failure investigations this heating season. The Monitors will

review the results of these investigations and track the remedial actions NYCHA takes in response to EH&S's proposals for corrective action. At HUD and the Monitors' request, NYCHA's Heating Management Services Department ("HMSD") has been implementing EH&S's recommendations for corrective action from prior heating seasons. According to NYCHA, since the Monitors' December 2024 Report, HMSD has implemented 58 of the 94 outstanding recommendations made by EH&S in prior heating seasons. For instance, HMSD has created borough-specific storerooms in Manhattan and the Bronx to provide easier access to commonly used materials that may be needed for emergency repairs. HMSD has also improved staffing levels on days forecasted to have below-average temperatures. While the Monitors commend NYCHA for its efforts to address the backlog of corrective recommendations, it is crucial that NYCHA consistently implements and closes out EH&S's corrective action recommendations in a timely manner.

F. Electronic Temperature Monitoring (Requirement Nos. H4, H5, H15)

The HUD Agreement requires NYCHA to install temperature sensors in at least 30% of the apartments in 44 developments with modernized **Building Management Systems** by December 31, 2020, to draft an action plan with a schedule for installing electronic temperature monitoring systems in the remaining developments, and to set deadlines for installing these sensors across all developments.¹⁹ The Agreement also requires NYCHA to include a mechanism for publicly disclosing temperature information from the sensors in that action plan.²⁰

Building Management Systems: Computerized controls that provide automation, remote monitoring, and remote control for building mechanical system such as boiler plants.

As of January 31, 2025, NYCHA reports that it has met the HUD Agreement requirement to install temperature sensors in at least 30% of the apartments in 44 developments. NYCHA is continuing its efforts to install temperature sensors at additional developments, consistent with its 2019 Heat Action Plan, which included a timeline for completing the installation of sensors across 277 developments.²¹

NYCHA has made real-time temperature data from sensors available to personnel responsible for heating, as well as to the Monitors, HUD, and SDNY, as the HUD Agreement requires.²² NYCHA removed sensor data from its website due to concerns about the accuracy of sensor readings.²³

The Monitors are verifying NYCHA's compliance with these obligations and are continuing to assess the functionality and reliability of these sensors to determine their effectiveness in providing accurate heating data.

G. Completed, In Compliance, and Superseded Obligations

The HUD Agreement obligations that NYCHA met prior to the period covered by this report (**Requirement Nos. H2, H3, H12, and H13**) are listed in Appendix A.

Overview of Outstanding Heating Obligations

The following table summarizes the status of NYCHA's compliance with the outstanding requirements of the HUD Agreement through January 31, 2025, unless otherwise noted. The table categorizes each requirement as a one-time requirement (blue); occurrence obligation (yellow); response obligation (orange); or policy and practice obligation (green).

Req. No.	Description	Status	Compliance Details
One-Time Requirements			
H1 (Ex. B ¶ 14(c))	Boiler Replacement–NYCHA: NYCHA will replace 297 boilers by December 31, 2026. Of the 297 boilers, 70 will be replaced by December 31, 2022, and another 63 (a total of 133) will be replaced by December 31, 2024.	As of December 31, 2024, NYCHA has replaced 138 boilers.	NYCHA has completed 138 boiler replacements as of December 31, 2024, and met the interim requirement of replacing 133 boilers by that date. The Monitors will track the agency's progress toward meeting this Agreement obligation.
H4 (Ex. B ¶ 7)	Installation of Electronic Temperature Monitoring Devices: NYCHA will install electronic temperature sensing devices sufficient to provide NYCHA a	Complete	As of January 31, 2025, NYCHA has installed temperature sensors in 30% of apartments in 44 developments.

Req. No.	Description	Status	Compliance Details
	comprehensive understanding of heating conditions in 30% of apartments in 44 developments by December 31, 2020.		
H5 (Ex. B ¶¶ 6- 7)	<p>Action Plans for Installing Temperature Monitoring and Disclosing Temperature Information.</p> <p>NYCHA will draft an action plan to set electronic temperature sensing device installation deadlines for the rest of the developments and provide an appropriate mechanism for disclosing information from electronic temperature reading devices to the public.</p>	Incomplete	The Monitors will work with NYCHA to update its action plan in light of its concerns regarding the accuracy of the temperature sensors.
H6 (Ex. B ¶ 2(a))	<p>Action Plan for Heat Mandatory Minimum Indoor</p>	Incomplete	This complaint methodology has been submitted to HUD and SDNY for review. Once the complaint

Req. No.	Description	Status	Compliance Details
	<p>Temperature: Establish an Action Plan setting forth a reliable method to measure what percentage of occupied apartments have had the temperatures fall below the mandatory minimum indoor temperature by October 1, 2024.</p>		<p>methodology is approved, the Monitors will work with NYCHA to incorporate it into an action plan.</p>
Occurrence Obligations			
<p>H7 (Ex. B ¶ 2(a))</p>	<p>Apartments with One Violation: Beginning in the 2024-2025 Heating Season, no more than 15% of occupied apartments shall have an occasion in which the temperatures fall below the mandatory minimum indoor temperature.</p>	<p>TBD</p>	<p>The Monitors will begin reporting on this requirement after coming to an agreement with the parties regarding how to measure compliance with the HUD Agreement regarding heating failures in individual apartments.</p>

Req. No.	Description	Status	Compliance Details
H8 (Ex. B ¶ 2(b))	<p>Apartments with More Than Three Violations: Beginning in the 2024-2025 Heating Season, no apartment shall have an occasion in which the temperatures fall below the mandatory minimum indoor temperature on more than three separate occasions.</p>	TBD	The Monitors will begin reporting on this requirement after coming to an agreement with the parties regarding how to measure compliance with the HUD Agreement regarding heating failures in individual apartments.
Response Obligations			
H9 (Ex. B ¶ 9(a))	<p>12 Hour Average Heat Restoration: Starting with the Heating Season beginning October 1, 2019, NYCHA will restore heat to apartments affected by a heating failure within an average of 12 hours.</p>	Partial compliance; 7.3 hours per heating outage	NYCHA responds to heating outages impacting multiple apartments within an average of 12 hours. NYCHA does not yet measure or report on its heating performance related to individual-apartment heating failures.
H11 (Ex. B ¶ 10(a))	<p>Overall Heat Restoration I - (2019-2024):</p>	On track for partial compliance	Supersedes H10 (Ex. B ¶ 9(b)). From October 1, 2024, through January

Req. No.	Description	Status	Compliance Details
	NYCHA will restore heat to affected apartments within (i) 12 hours for 85% of heating failures, and (ii) 24 hours for 100% of heating failures.	Heating outages: (i) 91% within 12 hours; (ii) 100% within 24 hours	31, 2025, NYCHA resolved 91% of heating outages within 12 hours, and 100% of heating outages within 24 hours. NYCHA does not yet measure or report on its heating performance related to individual-apartment heating failures.
Policy and Practice Obligations			
H14 (Ex. B ¶¶ 9(c), 10(b))	Heating Failure Investigation: Starting in October 2019, a root cause investigation will be performed for all heating failures where heat was not restored within 12 hours in a unit. Starting in October 2024, the investigation shall be performed by the Quality Assurance Unit.	Partial compliance	NYCHA is performing the required root cause investigations for all heating outages that lasted more than 12 hours, but not for all in-apartment heating failures. EH&S conducts investigations of some resident complaints received through NYCHA's Complaint Portal.
H15 (Ex. B ¶¶ 3-5)	Information from Electronic Temperature Sensing Devices: For apartments with electronic temperature	Partial compliance	NYCHA has made live temperature readings that are reported by electronic temperature sensors available to NYCHA development managers, the Monitors, HUD, and SDNY, but

Req. No.	Description	Status	Compliance Details
	<p>sensors, NYCHA shall institute and maintain a system that identifies apartments in violation of City temperature code requirements and the in unit and outdoor temperatures associated with the violations by April 1, 2019. This information will be available to all NYCHA personnel, the Monitors, HUD, and SDNY.</p>		<p>removed this data from its website.</p>

I.2 Elevators

The HUD Agreement requires NYCHA to (1) reduce the frequency and duration of occasions when all of the elevator cars in a bank are not in service (“**no-service conditions**”);²⁴ (2) reduce the frequency and duration of outages for all elevator cars;²⁵ (3) give prompt notice about elevator car outages and collect data about them;²⁶ (4) replace a set number of elevators;²⁷ (5) install remote elevator monitoring systems;²⁸ and (6) establish schedules for cleaning elevators and other planned elevator car outages that limit the inconvenience caused to residents.²⁹ The section below provides an update on NYCHA’s progress with respect to outstanding elevator-related obligations under the Agreement for the period from February 1, 2024, to January 31, 2025 (“Year 6”).

In Year 6, NYCHA made progress in several areas. For example, NYCHA has reduced the frequency and duration of no-service conditions and elevator car outages across its developments. In particular, for the first time, NYCHA met its obligation to resolve at least 85% of elevator car outages within ten hours of learning of them. NYCHA also satisfied its obligation to transfer 150 elevators to Permanent Affordability Commitment Together (“PACT”) developers before the respective deadline. Furthermore, NYCHA reported that it has satisfied its obligation to install remote monitoring units in 70% of its elevators, which the Monitors are in the process of verifying.

NYCHA made significant efforts in Year 6 to increase the quality of its elevator assets and the capacity and efficiency of its operations to reduce service outages and improve resident experience. A key component of this has been NYCHA’s enhancement of its preventive maintenance program.³⁰ NYCHA also revamped its elevator mechanic training program and adjusted its operations to resolve more outages on weekends.

Although NYCHA improved its performance on certain elevator requirements, it remains out of compliance with many of them. For example, in Year 6, NYCHA did not satisfy the HUD Agreement requirements that at least 85% of multi-elevator banks have no more than one no-service condition per year and that 100% of multi-elevator banks have no more than three no-service conditions per year. Additionally, NYCHA did not comply with the Agreement requirements that it resolve at least 85% of no-service

No-Service Condition:

The HUD Agreement defines “no-service conditions” to include only a situation where all elevators are out of service at one *building*. However, NYCHA, HUD, and SDNY have agreed that it is consistent with the purpose of the Agreement for “no-service conditions” to also include a situation where all elevators that serve an apartment are out of service, which generally means all elevators in one *bank* are out of service. For example, a single building may have one bank of elevators that serves the northern half of the building, and a second bank of elevators that serves the southern half of the building. If all of the elevators that serve the northern half of the building stop working, that would be considered a no-service condition because the apartments on the northern half of the building cannot be accessed by elevator, even though other elevators in the building continue to function.

conditions within four hours of learning of them and all no-service conditions within 12 hours of learning of them.

NYCHA also did not meet its elevator replacement obligation by December 31, 2024. The HUD Agreement required NYCHA to replace 275 elevators by December 31, 2024.³¹ NYCHA did not do so, replacing 168 elevators by December 31, 2024. As of January 31, 2025, NYCHA has replaced 176 elevators, and expects to replace the remaining 99 elevators by December 31, 2025. NYCHA also has not aligned its preventive maintenance work with the Agreement's requirements to avoid service disruptions during peak hours, between 6:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 8:00 p.m., or to provide advance notice to residents when it plans to take an elevator out of service for preventive maintenance.

The Monitors will continue to track and support NYCHA's efforts to complete its outstanding obligations, with a particular focus on efforts to improve assets and operations, such as further expanding the preventive maintenance program.

A. Elevator Replacements (Requirement Nos. E1-E2)

The HUD Agreement requires NYCHA to replace 275 elevators in its buildings by December 31, 2024.³² NYCHA fell short of this obligation, completing only 168 of the required elevator replacements by December 31, 2024³³—107 fewer than required by the Agreement.³⁴ As of January 31, 2025, NYCHA has completed eight additional elevator replacements, bringing the total to 176. NYCHA expects to complete the remaining 99 elevator replacements by December 31, 2025. Elevator replacements are critical for NYCHA to meet its other obligations and improve resident experience because newer (replaced) elevators have fewer outages than older elevators.

The HUD Agreement also requires NYCHA to transfer 150 additional elevators to third-party management through the PACT program by December 31, 2024, and for the PACT developer to replace those elevators "as needed," which reasonably encompasses substantial **modernization** efforts that significantly improve elevator performance, reliability, safety, and alignment with current regulatory and industry standards.³⁵ According to NYCHA, it met the requirement to transfer 150 elevators to PACT developers by August 31, 2024. As of February 24, 2025, the Monitors have verified that

Modernization:

Modernizing elevators refers to replacing key equipment and electronics and refurbishing the elevator cabs.

NYCHA's PACT partners modernized or replaced 73 of those elevators. The Monitors will continue their efforts to verify compliance with this obligation.

B. No-Service Conditions (Requirement Nos. E7-E8, E15-E16, E20, E22)

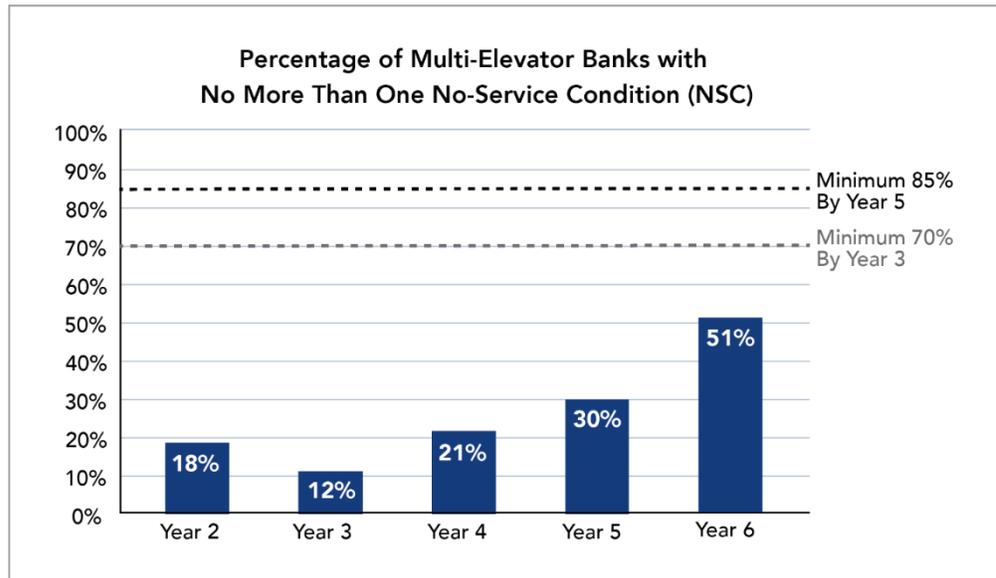
The HUD Agreement requires NYCHA to reduce how often and for how long residents face no-service conditions. NYCHA made improvements in Year 6 by reducing the frequency and duration of no-service conditions, in part through expanded preventive maintenance. However, NYCHA remains out of compliance and must do more in Year 7 to meet Agreement requirements, including avoiding planned outages during peak hours. The subsections below provide an update on NYCHA's obligations to (1) reduce the frequency of no-service conditions in elevator banks with multiple elevators; (2) reduce the duration of all no-service conditions; and (3) avoid scheduling planned outages that will result in a no-service condition during peak hours, between 6:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 8:00 p.m., and provide 24 hours' notice of planned outages to residents.

1. Frequency of No-Service Conditions (Requirement Nos. E7-E8)

The HUD Agreement requires NYCHA to reduce the frequency of no-service conditions in elevator banks with multiple elevators. In NYCHA developments, there are 709 elevator banks with multiple elevators.³⁶

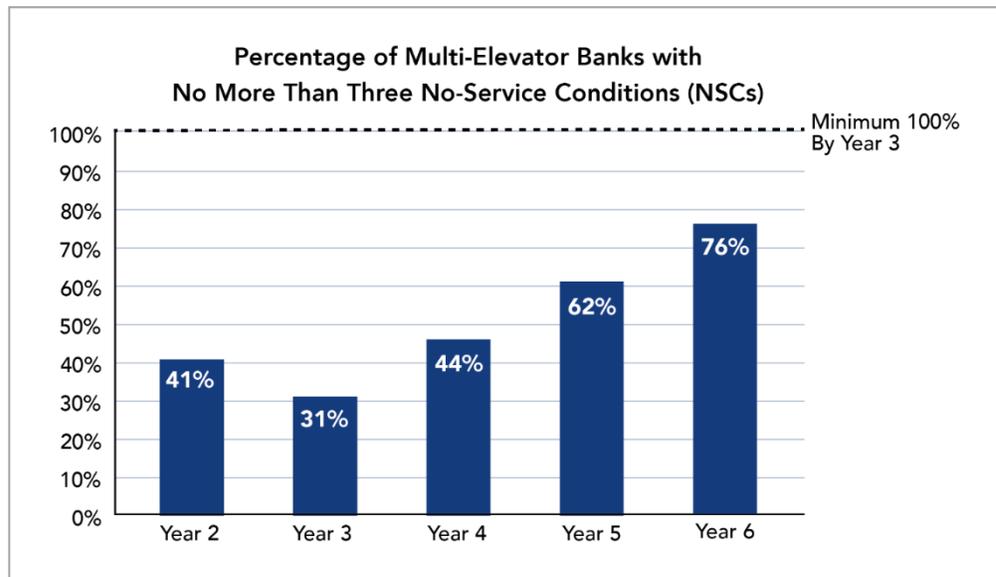
a. No More Than One No-Service Condition Per Year (Requirement No. E7)

Beginning in Year 5, the HUD Agreement requires NYCHA to ensure that at least 85% of multi-elevator banks have no more than one no-service condition per year.³⁷ NYCHA continued its multi-year improvement of its performance on this obligation in Year 6, as illustrated in the graph below, although it is still falling short of the Agreement's requirement.³⁸



b. No More Than Three No-Service Conditions Per Year (Requirement No. E8)

Beginning in Year 3, the HUD Agreement requires NYCHA to ensure that no multi-elevator banks have more than three no-service conditions per year.³⁹ Here too, NYCHA continued its multi-year improvement while still falling short of the Agreement’s requirement.⁴⁰

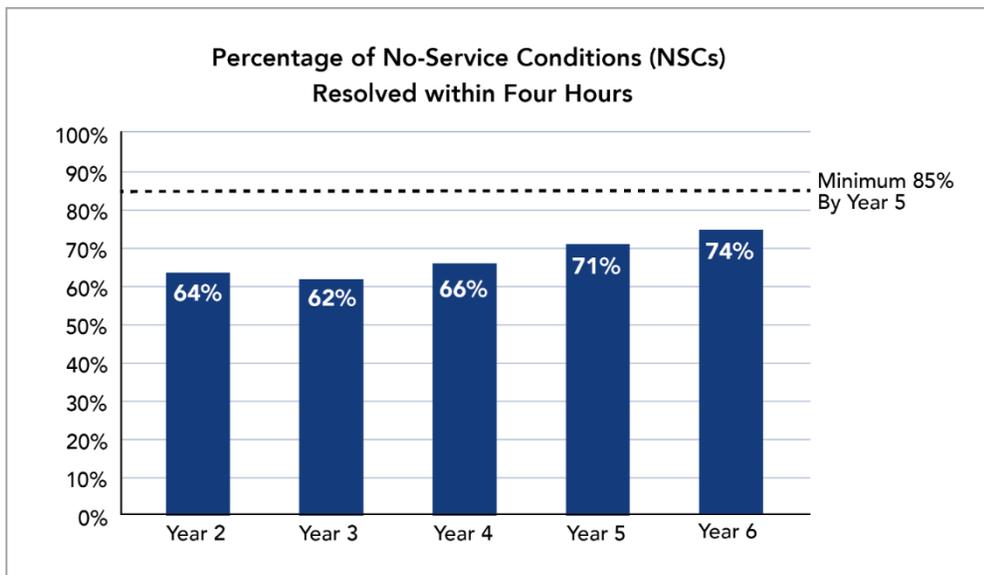


2. Duration of No-Service Conditions (Requirement Nos. E15-E16)

The HUD Agreement requires NYCHA to reduce the duration of all no-service conditions, regardless of whether they occur in multi-elevator banks or single-elevator banks.⁴¹

a. Four-Hour No-Service Resolution Obligation (Requirement No. E15)

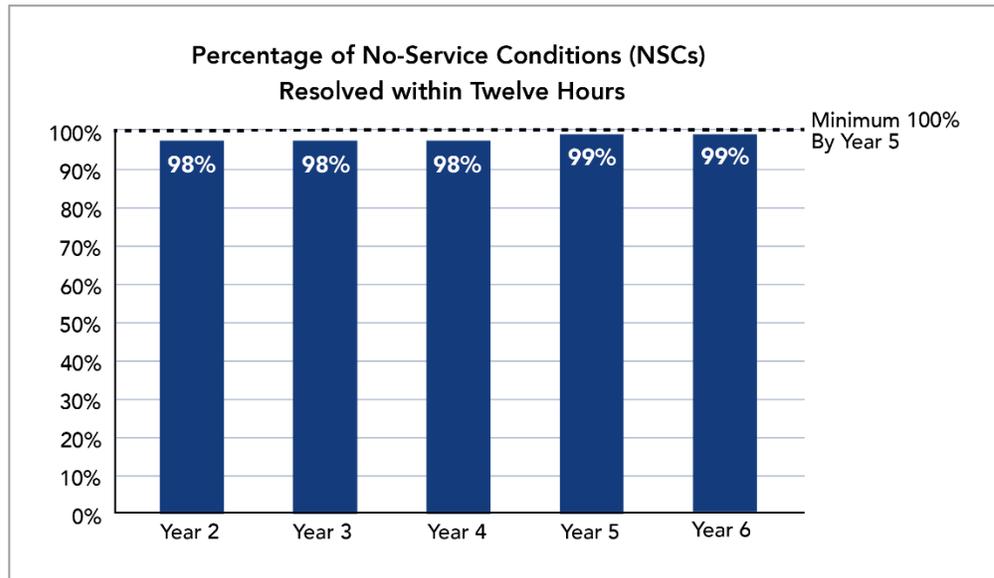
Beginning in Year 5, the HUD Agreement requires NYCHA to resolve 85% of no-service conditions within four hours of learning of them.⁴² In Year 6, NYCHA continued its improvement to 74%, but still fell short.⁴³



b. Twelve-Hour No-Service Resolution Obligation (Requirement No. E16)

Beginning in Year 5, the HUD Agreement also requires NYCHA to resolve 100% of no-service conditions within twelve hours.⁴⁴ NYCHA tracks outages due to elevator rehabilitation or replacement and is permitted to exclude those outages from this requirement. As such, the Monitors have excluded those outages from their assessment of NYCHA's performance under this obligation.⁴⁵

In Year 6, NYCHA maintained its performance, matching last year's performance of resolving 99% of no-service conditions within twelve hours, as illustrated in the graph below.⁴⁶



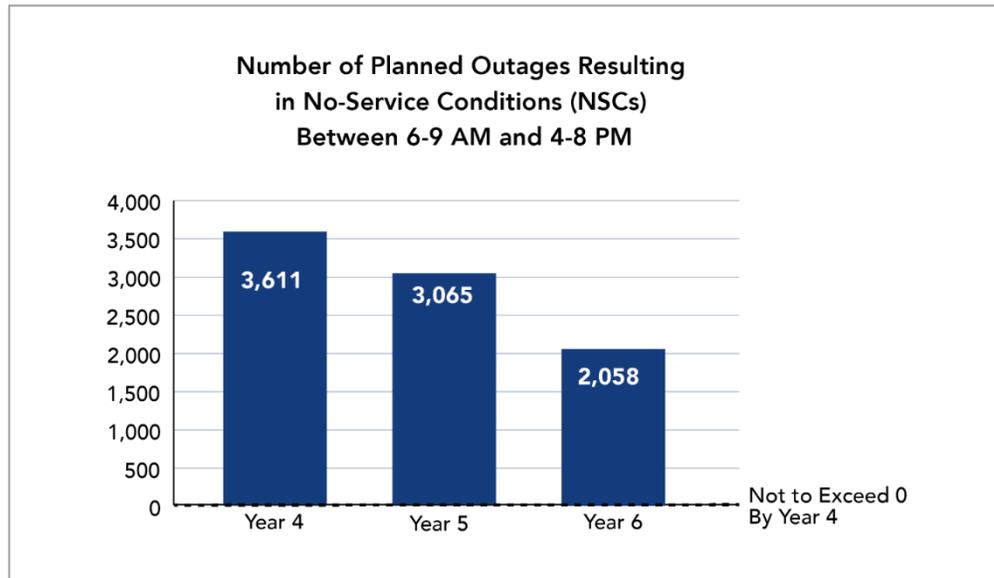
3. Timing of No-Service Conditions and Providing Advance Notice to Residents (Requirement Nos. E20, E22)

To minimize disruption to residents during peak morning and evening hours, the HUD Agreement requires NYCHA to avoid scheduling planned outages that will result in no-service conditions between 6:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 8:00 p.m.⁴⁷ There are only two exceptions to this rule—elevator replacement or rehabilitation, which can require an elevator to be out of service for weeks at a time, and a governmental agency or regulatory entity mandated outage, such as when the Department of Buildings conducts an elevator inspection.⁴⁸ Additionally, the Agreement requires NYCHA to provide residents with 24 hours’ notice of planned outages via robocall, postings in the development, and postings on NYCHA’s website.⁴⁹

NYCHA has not been in compliance with these requirements. As discussed in the Monitors’ December 2024 Report, residents reported that NYCHA frequently shut down elevators without notice and during peak hours.⁵⁰ However, NYCHA’s data did not reflect this noncompliance because these shutdowns were largely due to preventive maintenance, which NYCHA does not classify as planned outages.⁵¹ Accordingly, the Monitors previously could not fully assess the extent of NYCHA’s noncompliance with this obligation.

NYCHA does not classify preventive maintenance as a planned outage because NYCHA contends preventive maintenance falls under an exception in the HUD Agreement for outages mandated by a government agency. Specifically, NYCHA cites the New York City Construction Code, which requires property managers to perform elevator maintenance.⁵² After consulting with HUD and SDNY, the Monitors concluded that preventive maintenance outages do not fall within this exception because New York City law does not require NYCHA to conduct preventive maintenance during peak hours. In other words, NYCHA could comply with the Agreement and comply with New York City law by performing preventive maintenance during permitted hours, and thus preventive maintenance does not meet the purpose of the exception in the Agreement, which was to not penalize NYCHA for elevator outages outside of NYCHA's control. Furthermore, regardless of whether preventive maintenance is required by New York City law, NYCHA determines when to perform preventive maintenance on any particular elevator, making any outages associated with such work "planned" and therefore requiring advance notice to residents. Accordingly, the Monitors independently reviewed NYCHA's work order data to assess NYCHA's compliance with this obligation.

NYCHA is not in compliance with this requirement but has shown improvement since the Monitors first raised the issue with NYCHA. In both Years 4 and 5, there were more than 3,000 planned outages resulting in no-service conditions between 6:00 a.m. and 9:00 a.m. or between 4:00 p.m. and 8:00 p.m.⁵³ In Year 6, there were 2,058 such planned outages, reflecting a 32.9% decrease over Year 5. NYCHA attributes this decrease to consistent and thorough preventive maintenance. Specifically, once NYCHA completes an initial comprehensive preventive maintenance cycle—addressing years of accumulated dirt, grime, and mechanical residue—each subsequent cycle becomes faster and easier because there is significantly less residue to clean or remove. Thus, the more regularly and effectively NYCHA conducts preventive maintenance, the less time and effort future maintenance rounds require. The Monitors also credit improved awareness of the HUD Agreement obligation with prompting NYCHA to adjust its deployments and thereby more frequently avoiding preventive maintenance during peak hours.



NYCHA has identified various challenges in avoiding preventive maintenance work during the prohibited hours and in providing the required notice to residents. According to NYCHA, its elevator mechanics must prioritize unplanned outages and therefore often complete their preventive maintenance on elevators in multiple phases, taking elevators offline for a few hours at a time, several times per month.⁵⁴ Moreover, NYCHA schedules preventive maintenance during restricted hours to efficiently use the full shifts of elevator mechanics. The Monitors recognize that preventive maintenance is both required and beneficial and are committed to working collaboratively with NYCHA to address the challenges it faces. At the same time, taking elevators out of service without providing notice to residents creates a hardship for residents, particularly those who are mobility impaired. In light of these considerations, NYCHA has agreed to launch a pilot program at South Jamaica Houses to assess the feasibility of scheduling preventive maintenance and notifying residents by robocall at least 24 hours in advance of such planned outages.

C. Elevator Car Outages (Requirement Nos. E10, E12, E17-E19)

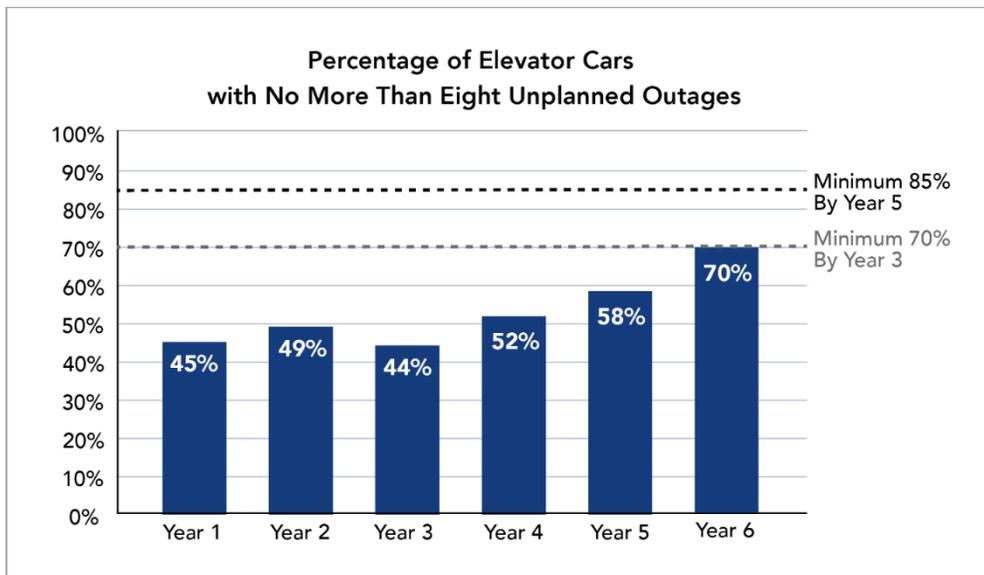
The subsections below provide an update on NYCHA's obligations to reduce the frequency and duration of unplanned outages in elevator cars.

1. Frequency of Unplanned Elevator Car Outages (Requirement Nos. E10, E12)

The HUD Agreement requires NYCHA to reduce the frequency of unplanned elevator car outages regardless of whether they occur in multi-elevator banks or single-elevator banks.

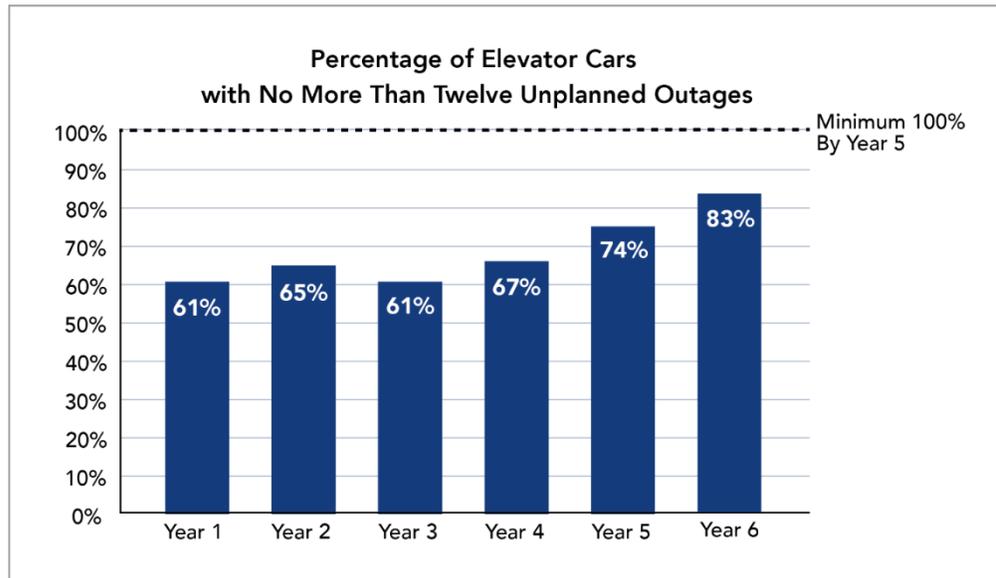
a. No More Than Eight Unplanned Outages (Requirement No. E10)

Beginning in Year 5, the HUD Agreement requires NYCHA to ensure that at least 85% of elevator cars have no more than eight unplanned outages per year.⁵⁵ In Year 6, NYCHA fell short, but continued to improve its performance under this obligation, with 70% of elevator cars having no more than eight unplanned outages, as illustrated in the graph below.



b. No More Than Twelve Unplanned Outages (Requirement No. E12)

Beginning in Year 5, the HUD Agreement also requires NYCHA to ensure that no elevator car has more than twelve unplanned outages per year.⁵⁶ Here too, NYCHA improved its performance, but is still short of meeting this obligation, as illustrated in the graph below.



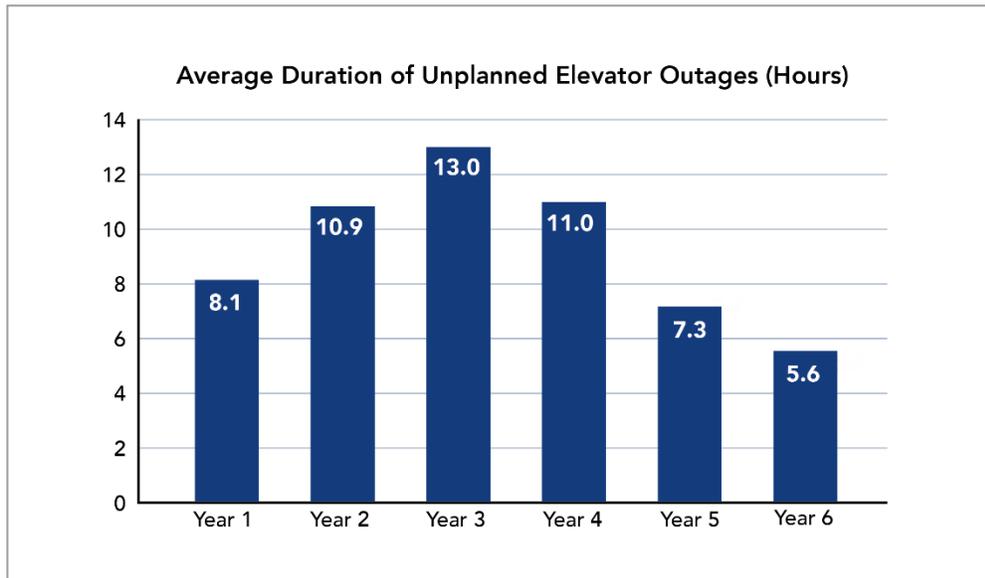
2. Duration of Elevator Car Outages (Requirement Nos. E17-E19)

The HUD Agreement requires NYCHA to comply with a series of obligations to reduce the duration of elevator car outages.

a. Percentage Reduction in Outage Duration (Requirement No. E17)

The HUD Agreement requires NYCHA to reduce the duration of service outages by 10% in Year 1 of the monitorship and to then reduce the average outage duration by a rate set by the Monitors.⁵⁷ NYCHA met this requirement in Year 1, and after regression in Years 2 and 3 during the COVID-19 pandemic, it has been reducing its response time by 10% or more since Year 3.⁵⁸

NYCHA's improvement continued in Year 6, as illustrated in the graph below, with an average duration of unplanned elevator car outages of 5.6 hours, a 23% improvement over Year 5.⁵⁹



This improvement can be credited, in part, to NYCHA's efforts to adjust its operations to timely resolve unplanned outages during the weekend to reduce the outage backlog before Monday each week. To do so, NYCHA added eight additional teams, a roving supervisor, and an extra dispatcher during the weekend hours. During Years 1 through 4, weekend outages added to the unplanned outage backlogs, which numbered in the hundreds for most months. In other words, NYCHA frequently had hundreds of elevators out-of-service across its developments on Monday mornings. Since it enhanced weekend service in Year 5, NYCHA has reduced these outage backlogs, with an average of 37 weekend outages per month during Year 6, as illustrated in the table below.

Count of Weekend Unplanned Outages Remaining Open After the Weekend by Month and Year													
Agreement Year	February	March	April	May	June	July	August	September	October	November	December	January	Year Total
Year 1	172	124	129	157	225	307	86	57	50	60	76	48	1,491
Year 2	69	66	54	205	135	272	203	173	221	154	98	147	1,797
Year 3	98	104	105	141	243	216	314	208	145	106	88	133	1,901
Year 4	68	130	247	310	228	238	199	228	182	75	102	87	2,094
Year 5	59	31	103	47	82	116	54	92	113	42	40	23	802
Year 6	26	36	23	30	73	51	48	51	22	31	37	19	447

Resolving these outages on the weekend reduced the duration of service outages and freed up field teams to conduct preventive maintenance and respond to new outages during the week. In Year 6, NYCHA took additional steps to reduce the duration of outages by increasing the capacity and efficiency of its operations. For example, NYCHA enhanced its elevator mechanic training program for new

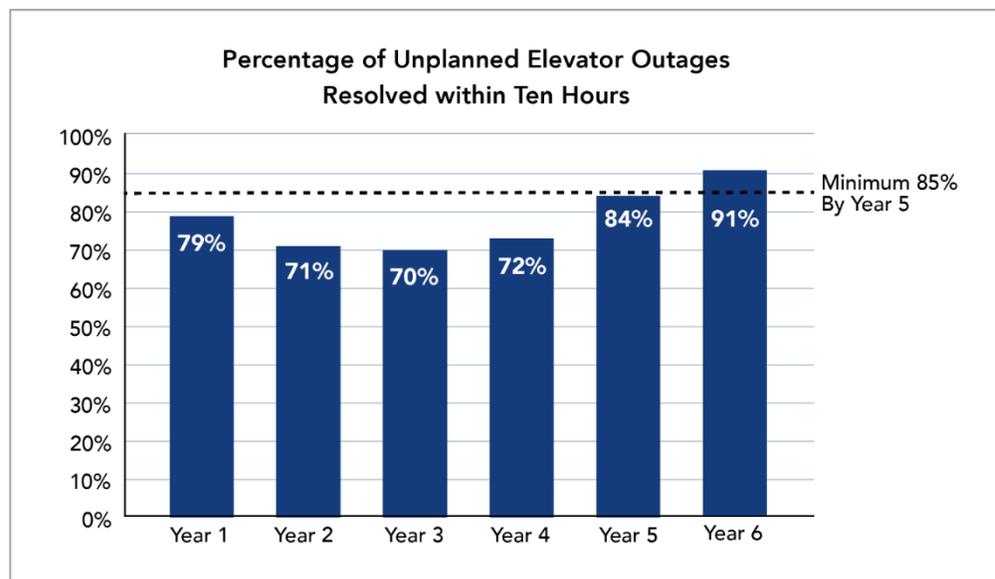
elevator mechanics and required refresher trainings for experienced mechanics. In Year 6, all mechanics completed the refresher course, and NYCHA reported improvements in the quality of repairs provided by its field teams.⁶⁰

Moving forward, NYCHA intends to continue increasing the capacity and efficiency of its operations by collaborating with the Monitors to create a system to optimize deployment of field teams and developing an inventory system and updating the preferred vendors list to allow teams to locate or acquire necessary parts more quickly.

To push NYCHA to build on its improvements, the Monitors have set a target of 10% for NYCHA to reduce average elevator car outage duration in Year 7. The Monitors will continue to support NYCHA's efforts to reduce the duration of no-service conditions and provide updates in future reporting.

b. Ten-Hour Outage Obligation (Requirement No. E18)

Beginning in Year 5, the HUD Agreement requires NYCHA to resolve 85% of unplanned elevator car outages within ten hours of learning of them.⁶¹ In Year 6, NYCHA met this requirement for the first time, resolving 91% of unplanned elevator car outages within ten hours of learning of them, as illustrated in the graph below.⁶²

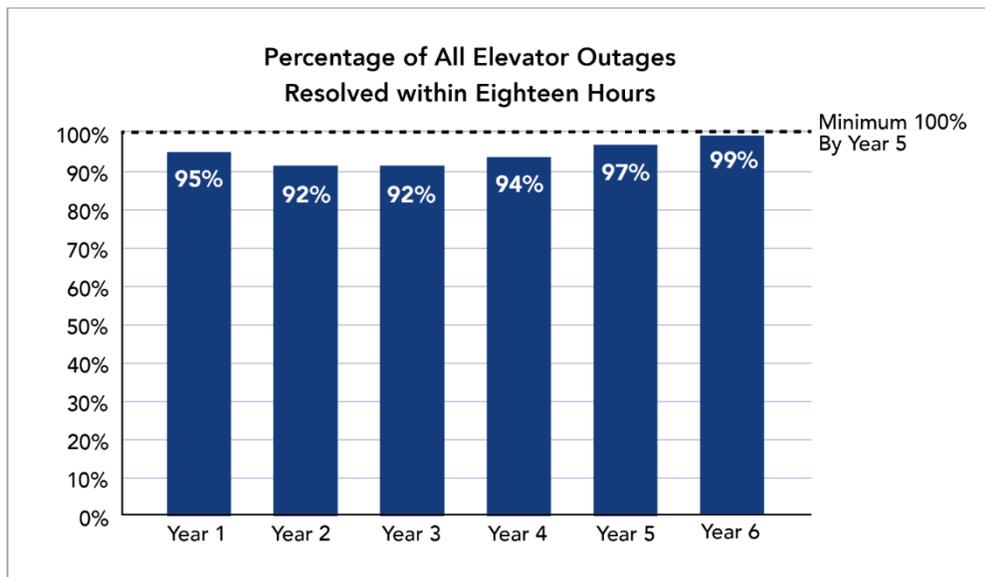


The Monitors commend NYCHA for its efforts to reduce the duration of elevator car outages and will continue to support NYCHA's efforts to maintain and improve its performance under this obligation going forward.

c. Eighteen-Hour Outage Obligation (Requirement No. E19)

Beginning in Year 5, the HUD Agreement also requires NYCHA to resolve 100% of elevator car outages within eighteen hours.⁶³ NYCHA tracks outages due to elevator rehabilitation or replacement and is permitted to exclude those outages from this requirement. As such, the Monitors have excluded those outages from their assessment of the NYCHA's performance under this obligation.⁶⁴

In Year 6, NYCHA resolved 99% of elevator car outages within eighteen hours, as illustrated in the graph below.⁶⁵ Here too, NYCHA nearly met this requirement, improving its performance.



D. Remote Elevator Monitoring (Requirement No. E5)

The HUD Agreement requires NYCHA to establish continuous remote monitoring in 70% of its elevators by January 31, 2025.⁶⁶ NYCHA reports that it installed **Remote Elevator Monitoring Systems ("REMS")**, technology capable of continuous remote monitoring, in 75.8% of its elevators by January 31, 2025, surpassing the required threshold. The Monitors are verifying that the REMS units

Remote Elevator Monitoring Systems:

REMS provide continuous monitoring by tracking elevator performance through sensors that detect faults. When a sensor is triggered, it generates a fault code that is stored on a local server at each elevator. The fault codes deliver high-level information about potential malfunctions, and elevator mechanics are instructed to review the codes before performing repairs or maintenance on an elevator. The newer REMS also send fault codes to a cloud-based monitoring system, alerting dispatch, the Supervisor of Elevator Mechanics ("SEMS"), elevator administrators, and elevator special teams, which facilitates quicker response and resolution.

are functioning as intended. The Monitors understand that NYCHA will continue to install REMS as part of its elevator replacement projects to maximize benefits for both NYCHA's operations and residents.

E. Completed and In Compliance Obligations

The HUD Agreement obligations that NYCHA met prior to or were superseded before Year 6 (**Requirement Nos. E3, E4, E6, E9, E11, E13, E14, E23**) are listed in Appendix A.

Overview of Outstanding Elevator Obligations

The following table summarizes the status of NYCHA's compliance with the requirements of the HUD Agreement through the end of Year 6 (January 31, 2025), unless otherwise noted, and categorizes each requirement as a one-time requirement (blue); occurrence obligation (yellow); response obligation (orange); or policy and practice obligation (green). Obligations completed in the period covered by this report will be moved to the Appendix in future reports.

Req. No.	Description	Status	Compliance Details
One-Time Requirements			
E1 (Ex. B ¶ 34(b))	Elevator Replacement - NYCHA: By December 31, 2024, NYCHA will replace 275 elevators.	Not met	By December 31, 2024, NYCHA completed 168 of the required elevator replacements. As of January 31, 2025, NYCHA has completed 176 elevator replacements. NYCHA expects to complete 275 elevator replacements by December 31, 2025.
E2 (Ex. B ¶ 34(b))	Elevator Replacement - PACT: By December 31, 2024, NYCHA will transfer 150 elevators to third-party management through the PACT program. The developer selected will	Complete	NYCHA has represented to the Monitors that, by August 31, 2024, NYCHA transferred 68 developments to PACT developers, and those developments included more than 150 elevators. NYCHA has further represented that, by January 31, 2025,

Req. No.	Description	Status	Compliance Details
	replace elevators as needed.		NYCHA transferred over 200 elevators to PACT developers. As of February 24, 2025, the Monitors have verified that NYCHA's PACT partners modernized or replaced 73 elevators in those developments.
E5 (Ex. B ¶ 31)	Remote Elevator Monitoring System: NYCHA will install continuous remote monitoring systems in at least 70% of its elevators.	Complete	As of January 31, 2025, NYCHA has reported that approximately 75.8% of NYCHA's elevators have technology capable of continuous remote monitoring ("REMS"). The Monitors are confirming that these systems are functional.
Occurrence Obligations			
E6 (Ex. B ¶ 24(a))	Buildings with One No-Service Condition: Beginning in Year 5, at least 85% of elevator banks with more than one elevator will have no more than one instance per year where all elevators are out of service	Not in compliance; 51% in Year 6	NYCHA does not comply with this obligation. In Year 6, 49% of multi-elevator banks had more than one no-service condition.

Req. No.	Description	Status	Compliance Details
E8 (Ex. B ¶¶ 23(a), 24(a))	<p>Buildings with Three No-Service Conditions: Beginning in Year 3, no elevator bank with more than one elevator should have more than three no-service conditions.</p>	Not in compliance; 76% in Year 6	NYCHA does not comply with this obligation. In Year 6, 24% of multi-elevator banks had more than three no-service conditions.
E10 (Ex. B ¶ 24(b))	<p>Eight Unplanned Outages: Beginning in Year 5, at least 85% of all elevators in NYCHA buildings shall have no more than eight unplanned outages per year.</p>	Not in compliance; 70% in Year 6	NYCHA does not comply with this obligation. In Year 6, 30% of elevators had more than eight unplanned outages.
E12 (Ex. B ¶ 24(b))	<p>Twelve Unplanned Outages: Beginning in Year 5, no elevator shall have more than twelve unplanned outages per year.</p>	Not in compliance; 83% in Year 6	NYCHA does not comply with this obligation. In Year 6, 17% of elevators had more than twelve unplanned outages.
Response Obligations			

Req. No.	Description	Status	Compliance Details
E15 (Ex. B ¶ 29(a)(i))	<p>Four-Hour No-Service Conditions: Beginning in Year 5, at least 85% of no-service conditions shall be resolved within four hours of the time NYCHA learns of them.</p>	Not in compliance; 74% in Year 6	NYCHA does not comply with this obligation. In Year 6, 26% of no-service conditions resulting from unplanned outages lasted more than four hours.
E16 (Ex. B ¶ 29(a)(ii))	<p>Twelve-Hour No-Service Conditions: Beginning in Year 5, no no-service condition shall last more than twelve hours, with limited exceptions.</p>	Not in compliance; 99% in Year 6	NYCHA does not yet comply with this obligation, but it is close: in Year 6, 1% of no-service conditions resulting from all qualifying outages lasted more than twelve hours. NYCHA does not track and exclude from its calculations no-service conditions where the industry accepted repair time is longer than twelve hours, as it is entitled to do under the HUD Agreement. If it did so, it might have improved performance or even be in compliance with this requirement.
E17 (Ex. B ¶ 28)	<p>Improved Outage Duration: After Year 1, the</p>	In compliance; 23% reduction in average unplanned	The First Monitor did not set a target for Year 6 before it began. However,

Req. No.	Description	Status	Compliance Details
	outage duration shall improve over the prior year by a rate set by the Monitors.	outage duration compared to last year	NYCHA decreased its average unplanned outage duration from 7.3 hours in Year 5 to 5.6 hours in Year 6, a significant improvement. The Monitors set a target of 10% reduction in outage duration for Year 7.
E18 (Ex. B ¶ 29(b)(iii))	<p>Ten-Hour Elevator Car Outages:</p> <p>Beginning in Year 5, at least 85% of elevator car outages shall be resolved within ten hours of the time NYCHA learns of them.</p>	In compliance; 91% in Year 6	In Year 6, only 9% of unplanned elevator car outages lasted more than ten hours.
E19 (Ex. B ¶ 29(b)(iv))	<p>Eighteen-Hour Elevator Car Outages:</p> <p>Beginning in Year 5, no elevator car outage shall last more than eighteen hours, with limited exceptions.</p>	Not in compliance; 99% in Year 6	NYCHA does not comply with this obligation, but it is close to complying with this obligation: in Year 6, 1% of all qualifying elevator car outages lasted more than eighteen hours. NYCHA does not track and exclude from its calculations no-service conditions where the industry accepted repair time is longer than eighteen hours, as it is entitled to do under the HUD

Req. No.	Description	Status	Compliance Details
			Agreement. If it did so, it might have improved performance or even be in compliance with this requirement.
E20 (Ex. B ¶ 32)	<p>Resident Outage Notification System: By July 31, 2019, NYCHA will establish a system that provides 24 hours' advanced notice of all planned outages and notice of all unplanned outages within two hours to residents of buildings affected by the outages.</p>	Not in compliance	NYCHA does not comply with this obligation because it does not provide notice to residents for outages due to preventive maintenance.
E21 (Ex. B ¶ 33)	<p>Monitor Outage Notification System: NYCHA will provide the Monitors 24 hours' advanced notice of any planned outage and shall notify the Monitors of any unplanned outage within two hours of learning about it.</p>	Not in compliance	NYCHA does not comply with this obligation because it does not provide notice to the Monitors for outages due to preventive maintenance.

Req. No.	Description	Status	Compliance Details
Policy and Practice Obligation			
E22 (Ex. B ¶ 27)	<p>Planned Outages: By February 1, 2020, NYCHA shall not have planned outages resulting in a no-service condition between 6 a.m. and 9 a.m. or between 4 p.m. and 8 p.m., except for planned elevator rehabilitation or replacement or outages mandated by another governmental agency or regulatory entity.</p>	<p>Not in compliance; NYCHA had 2,058 instances of planned outages resulting in a no-service condition during the peak hours in Year 6</p>	<p>NYCHA does not comply with this obligation. As of January 31, 2025, planned outages, including service disruptions due to preventive maintenance, continue to result in no-service conditions during the prohibited hours.</p>

1.3 Pests & Waste

Pests: Under the HUD Agreement, the term “pests” refers to rats, mice, cockroaches, and bed bugs.

Integrated Pest Management (“IPM”): An environmentally friendly, commonsense approach to pest control. Unlike traditional pest management, which involves the routine application of pesticide, IPM focuses on the prevention of pests and uses pesticide only as needed. It involves multiple forms of pest controls, and has a four-tiered approach: (1) identify pests and monitor progress, (2) set action thresholds, (3) prevent pests, and (4) control pests.

Other Pests: These are all pests covered under the HUD Agreement except rats—mice, cockroaches, and bed bugs.

Action Plan: An Action Plan sets forth policies and practices to be adopted and specific actions to be taken by NYCHA to achieve the terms and requirements of the HUD Agreement.

Under the HUD Agreement, NYCHA must (1) estimate and report on the size of the **pest** population at each development and reduce those pest populations by specific percentages over time;⁶⁷ (2) respond to residents’ pest complaints within prescribed deadlines;⁶⁸ (3) apply timely and effective pest management techniques informed by **Integrated Pest Management (“IPM”)** practices;⁶⁹ (4) increase cleanliness at developments by improving waste management practices;⁷⁰ and (5) upgrade specified pest and waste management infrastructure.⁷¹

The subsections below provide an update on NYCHA’s progress toward compliance with the outstanding pest and waste requirements in Year 6.

In the past year, NYCHA made important gains. Significantly, the Monitors, in consultation with NYCHA, finalized protocols pursuant to which NYCHA will produce pest population estimates for each development at least quarterly, as required by the HUD Agreement.

These pest population estimates can now be used to determine whether NYCHA met the agency-wide pest population reduction requirements set out in the HUD Agreement. In Year 6, NYCHA achieved the agency-wide reduction requirements for mice, cockroaches, and bed bugs (“**other pests**”), an important accomplishment, though NYCHA has not yet met the reduction requirements for rats.

Further, NYCHA has dramatically improved its response time to all pest complaints. During Year 6, NYCHA has met or nearly met the HUD Agreement’s rat response time requirements for the first time, a significant milestone. For other pests, although NYCHA remains out of compliance with the response time requirements, it has significantly improved its performance compared to Year 5.

NYCHA also continues to make progress on its large-scale infrastructure and/or capital projects required under the HUD Agreement or committed to via an **Action Plan**, which improve pest management and cleanliness. For instance, NYCHA anticipates completing its commitment to install 50 rat slabs by October 2025, despite experiencing repeated delays.

NYCHA does not yet comply with all HUD Agreement requirements, however. For example, now that the protocols have been finalized, NYCHA is required to publish the newly determined pest population estimates on its website by development. This will allow residents to see for the first time how well NYCHA is controlling pests across NYCHA and at their own developments. NYCHA projects that it will not publish the pest population estimates until early 2026, a timeline that the Monitors hope to shorten by working with NYCHA to expedite the publication process. In the meantime, the Monitors will include NYCHA-wide estimates in their reporting.

Additionally, although NYCHA mandates the use of industry-standard IPM techniques as the Agreement requires, NYCHA exterminators do not consistently apply these techniques, which leads to uneven pest control. Similarly, although NYCHA mandates daily grounds and common area inspections for cleaning and maintenance needs and correction of observed deficiencies to comply with the corresponding Agreement requirement, the quality of these inspections and corrections varies, which leads to disparate levels of cleanliness.

Moving forward, the Monitors will continue to track and report on NYCHA's efforts to comply with the outstanding pest and waste requirements.

A. Pest Population Reporting and Reduction Requirements (Requirement Nos. P7-P11)

Pursuant to the HUD Agreement, the Monitors, in consultation with NYCHA, established reasonable protocols (the "Protocols") for NYCHA to estimate the pest populations at each development on a quarterly basis.⁷² The Agreement requires NYCHA to publish those estimates on its website whereby stakeholders, including residents, can assess whether NYCHA is reducing pest populations.⁷³ The Protocols also allow the Monitors to determine whether NYCHA has met the Agreement's pest population reduction requirements.

The following subsections set out the Protocols, summarize NYCHA's plan for publishing the pest population estimates, and assess NYCHA's compliance with the pest population reduction requirements.

1. Pest Population Protocols

The Protocols provide reasonable estimates of the presence of the four pest types—rats, mice, cockroaches, and bed bugs—rather than counts of the actual number of pests. The parties agreed to this methodology because it is not feasible to count all individual pests.

Accordingly, the Protocols measure the total number of resident pest complaints, as represented by the total number of resident-based complaint work orders for apartments adjusted to account for resident over and under reporting of pests. The Protocols set out a three-step process for determining the pest population estimates, which is described below:

Determine the Baseline. The first step is to determine the baseline level of resident pest complaints as represented by the total number of resident complaint-based work orders for apartments. For example, determining the Year 6 baseline for mice NYCHA-wide involves tallying all the resident complaint-based work orders for mice in all NYCHA apartments for the year. In Year 6, there were 6,525 resident complaint-based mouse work orders. This is the baseline.

Apply the Overcount Amount. The second step is to apply an overcount adjustment to the baseline number of resident complaint-based work orders. An overcount occurs when a resident makes a pest complaint about a pest in their apartment whose presence cannot be verified. For example, if a resident complains about mice, but an exterminator identifies cockroaches or finds no evidence of the presence of any pests during the inspection, then an overcount has occurred. To apply the overcount adjustment, two types of work orders are identified and subtracted from the baseline amount: (1) work orders that indicate that an exterminator applied no pest control materials and (2) work orders that indicate pest control materials for a different pest were applied. Using the mouse example above, applying the overcount adjustment involves subtracting all resident complaint-based work orders in Year 6 where an exterminator observed no mouse presence—518 work orders—from the baseline amount—6,525 work orders. The difference is 6,007, or the step two amount.

Apply the Undercount Amount. The third and final step is to apply an undercount adjustment to the step two amount, so the final pest population estimate reflects that not all residents report when there are pests present in their apartments. This can happen, for example, when a resident is unaware of a bed bug infestation and therefore does not make a complaint, or when a resident reports mice, but the exterminator determines that cockroaches are present. To apply the undercount adjustment, the step two amount for a pest type is multiplied by the undercount multiplier for that pest. To determine the undercount multiplier for each pest type, each year Environmental Health & Safety (“EH&S”) performs a set number of undercount inspections. Undercount inspections are inspections for rats, mice, cockroaches, and bed bugs in a sample number of apartments for which no pest complaints were made for the previous 12 months. The undercount multiplier is based on the number of apartments inspected where EH&S inspectors identify a pest presence compared to the total number of inspected apartments adjusted using statistical tools developed by the Monitors’ consulting urban entomologists.⁷⁴ Using the mouse example, applying the undercount adjustment involves multiplying the step two amount by the undercount multiplier for mice. In Year 6, the undercount multiplier for mice was 1.81. The step two amount described above of 6,007 is multiplied by 1.81. The result is 10,873 resident complaint-based work orders adjusted for under- and overcount, i.e., the Year 6 mouse population estimate.

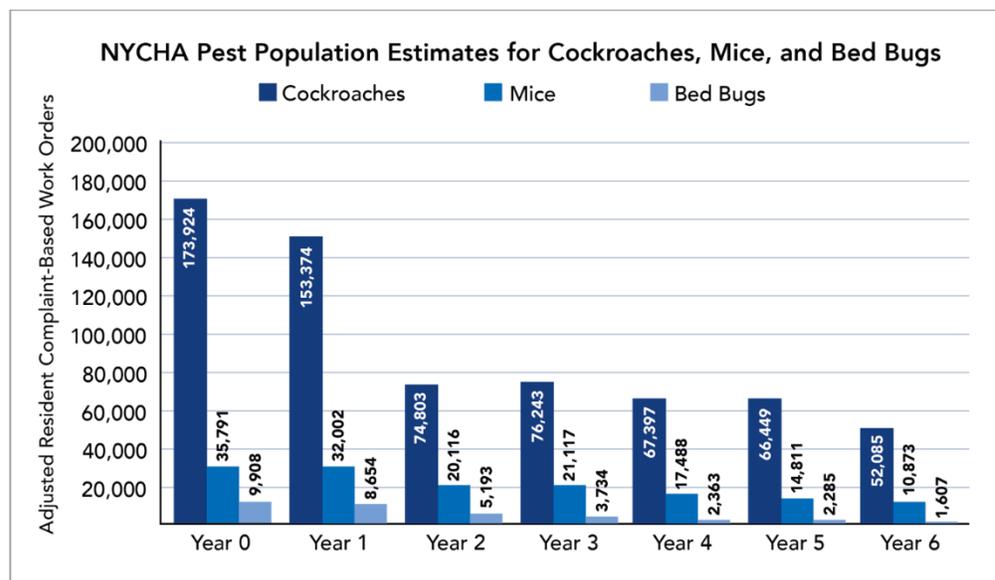
2. Publish Pest Population Estimates

Under the HUD Agreement, NYCHA must use the Protocols to develop and publish reliable pest population estimates for each development at least quarterly.⁷⁵ To do this, NYCHA first needs to develop and implement business rules for determining the pest populations and publishing the pest populations on its website. NYCHA reports that it will finalize the business rules by April 2025 and begin publishing pest population estimates on its website by early 2026. According to NYCHA, the delay in publication is due to having to develop new business rules that align with the Protocols, as well as a backlog of IT projects and staffing constraints.

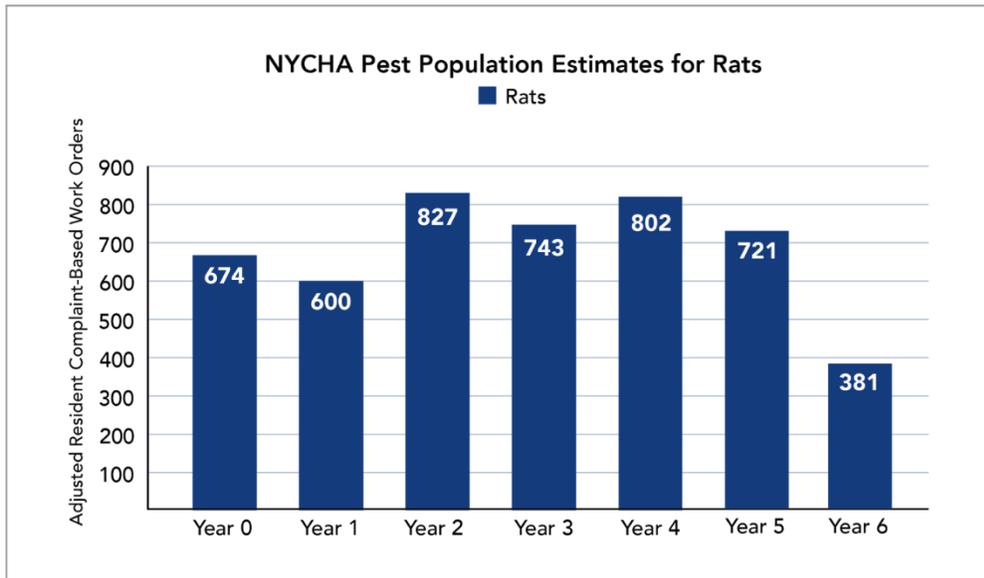
Given the importance of sharing the pest population estimates with residents, the Monitors will work with NYCHA to determine whether publication can be expedited. In the meantime, the Monitors will include agency-wide pest population estimates in their reports.

It is important to note that the figures in the pest population estimate charts do not represent the exact number of pests across NYCHA. Rather, they are estimates of the pest presence at NYCHA as determined by the above process and based on residents' pest complaints adjusted for over and under reporting of pests.

The chart below depicts the pest population estimates for cockroaches, mice, and bed bugs for Year 0, the year before the outset of the monitorship in 2019 (i.e., February 1, 2018 to January 31, 2019), through Year 6. Based on these calculations, NYCHA appears to have dramatically reduced the presence of these pests since Year 0.



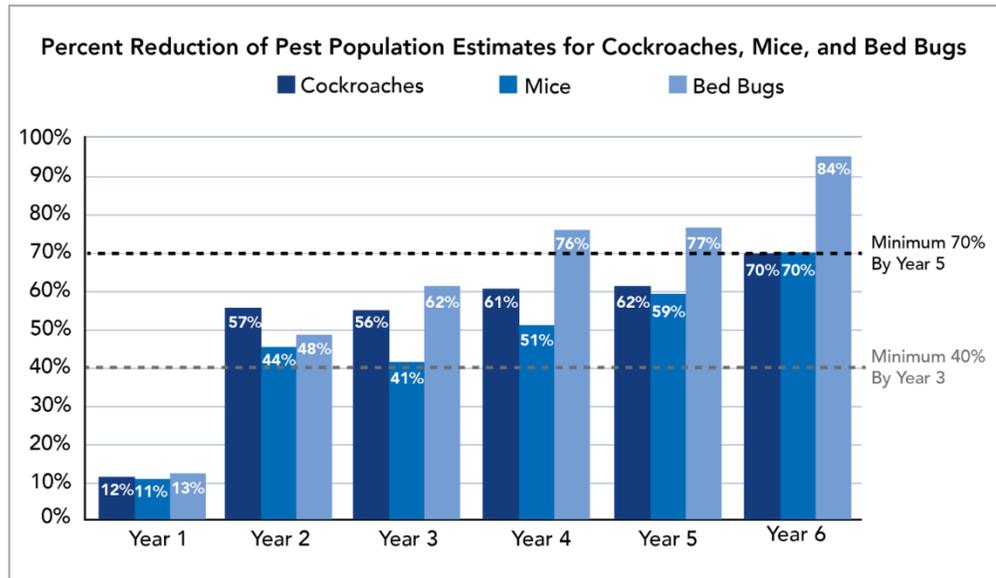
The chart below depicts the pest population estimates for rats for Years 0 to 6. Although the rat population in Years 2 through 5 was higher than the baseline population in Year 0, the rat population substantially decreased in Year 6, as discussed in more detail below.



3. Reduce Pest Populations

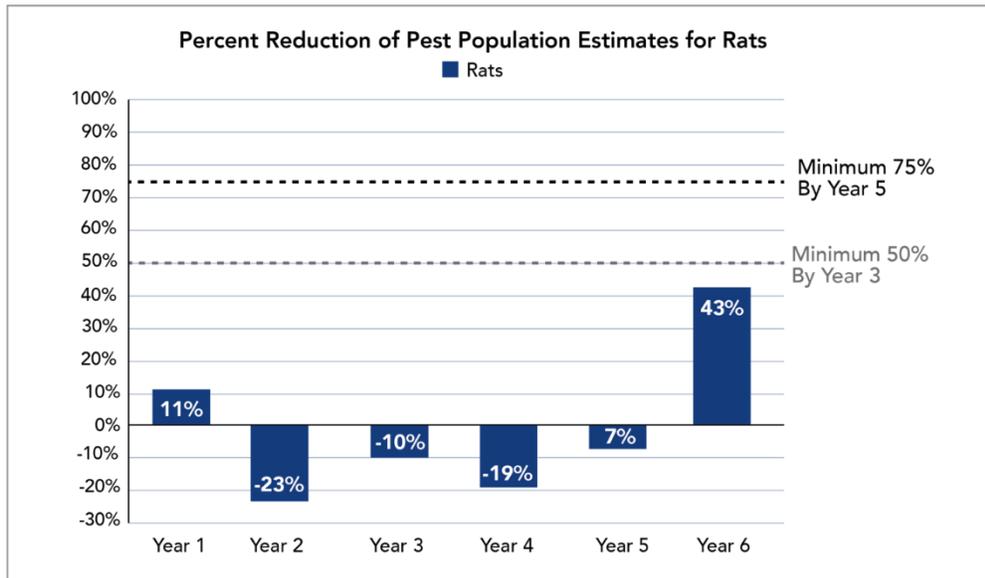
The HUD Agreement required NYCHA to reduce pest populations by certain percentages by January 2022, the end of Year 3, and by January 2024, the end of Year 5. First, NYCHA was required to reduce the rat population by 50%, and the mouse, cockroach, and bed bug populations by 40% by the end of Year 3.⁷⁶ Second, NYCHA was required to achieve an additional 50% reduction for all pest types by the end of Year 5.⁷⁷ This means that NYCHA was required to cumulatively reduce the rat population by 75%, and reduce the other pest populations by 70% by the end of Year 5.

The Monitors used the Protocols to determine pest population estimates for each year of the monitorship and then to assess whether NYCHA satisfied the Year 3 and Year 5 reduction requirements. As depicted in the chart below, NYCHA met the Year 3 reduction requirements for cockroaches, mice, and bed bugs. NYCHA also met the Year 5 reduction requirement for bed bugs. Although it did not meet the cockroach and mouse reduction targets in Year 5, NYCHA did meet these targets by the end of Year 6.



The Monitors commend NYCHA for achieving these reduction requirements. The Monitors' consulting urban entomologists, who provide subject matter and technical expertise to NYCHA and advise the Monitors, attribute this success to NYCHA's initial targeted treatment of infestations and improvement of its pest management processes, including the creation of specialized pest teams, the emphasis on more thorough inspections and initial pest control treatments, the focus on continued follow-up treatments, and the development and improvement of new and existing trainings.

As depicted in the chart below, NYCHA did not meet the reduction requirements for rats. Indeed, NYCHA struggled to address the rat population, especially in Years 2 through 4. But NYCHA has made considerable progress in Year 6, improving the reduction rate dramatically from Year 5.



The Monitors' consulting urban entomologists caution against the conclusion that the increase in rat population (represented in the above chart as a negative percentage) was due solely to poor rat control. The scientific literature and the consulting urban entomologists' experience indicate that changes in rat activity due to the COVID-19 pandemic contributed to the increased presence of rats in residential buildings.

B. Respond to Resident Pest Complaints (Requirement Nos. P14-P15)

Under the HUD Agreement, NYCHA is required to respond to resident pest complaints in apartments within certain timeframes depending on the pest type.⁷⁸

Overall, NYCHA has dramatically improved its response time to all pest complaints. During Year 6, NYCHA has met or nearly met the HUD Agreement's rat response time requirements for the first time, a significant milestone. For other pests, although NYCHA remains out of compliance with the response time requirements, it has significantly improved its performance compared to Year 5.

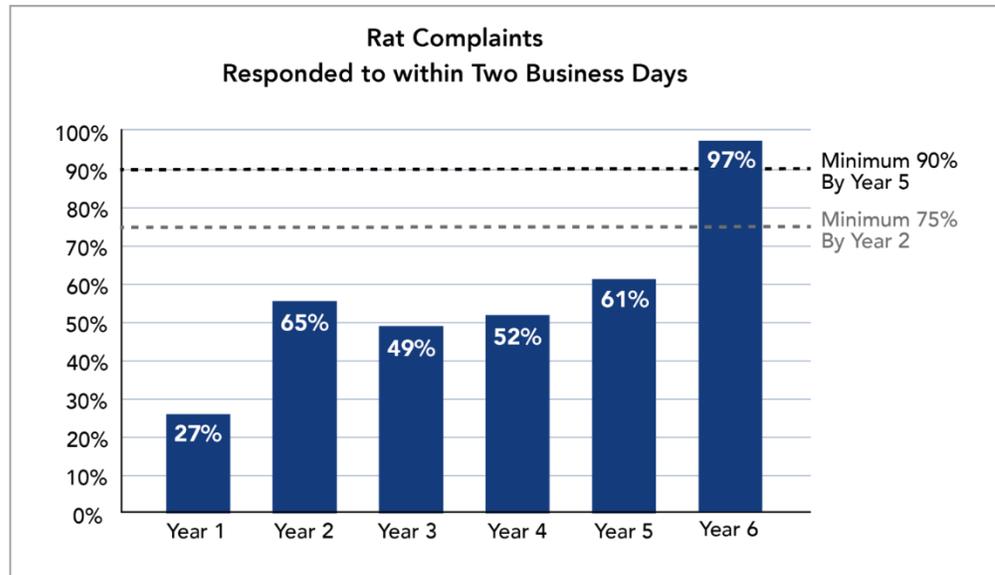
NYCHA attributes its success to several pest management efforts, including the development of specialized pest teams, improvements by the Pest Management Department in scheduling and resident communication, and a continued commitment to filling vacancies in the Pest Management Department.⁷⁹

The subsections below provide an update on NYCHA's response times to rat and other pest complaints.

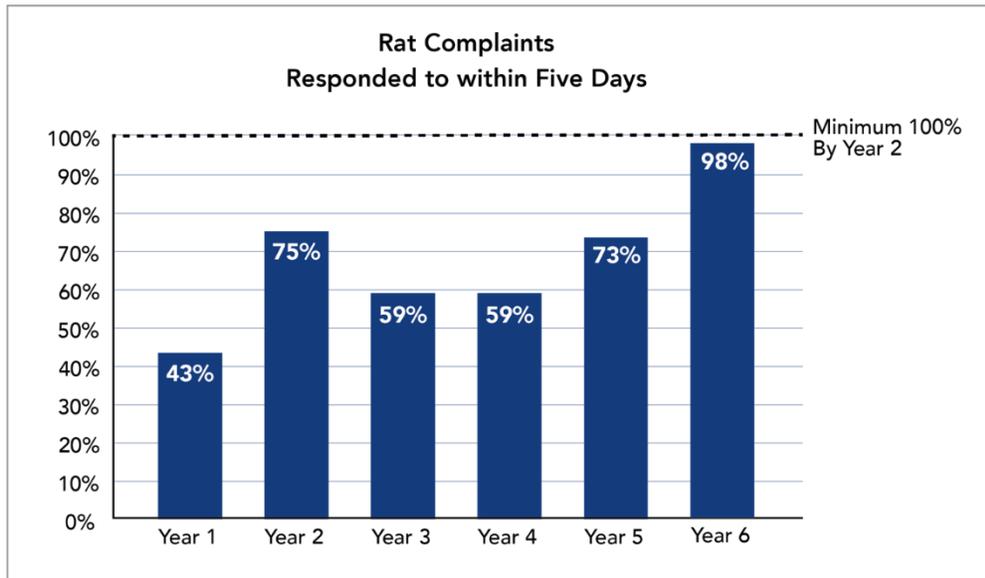
1. Respond to Rat Complaints (Requirement No. P14)

The HUD Agreement requires NYCHA, by the end of Year 5, to respond to 90% of all rat complaints within two business days, and to 100% of rat complaints within five calendar days.⁸⁰

In Year 6, NYCHA responded to 97% of residents' rat complaints within two business days, exceeding the 90% requirement.



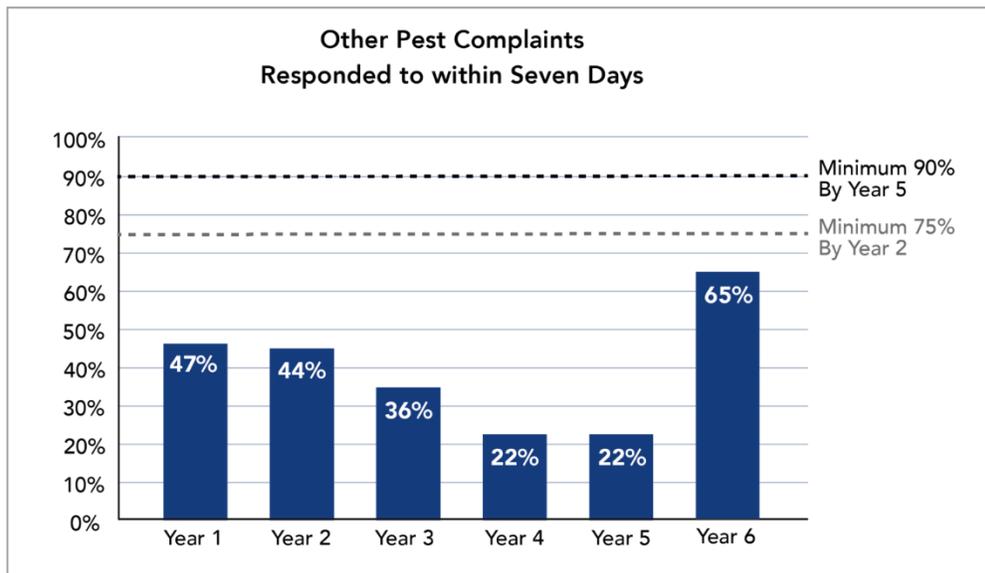
Similarly, and as depicted in the chart below, NYCHA responded to 98% of resident rat complaints within five calendar days. NYCHA also substantially improved its performance as compared to Year 5.



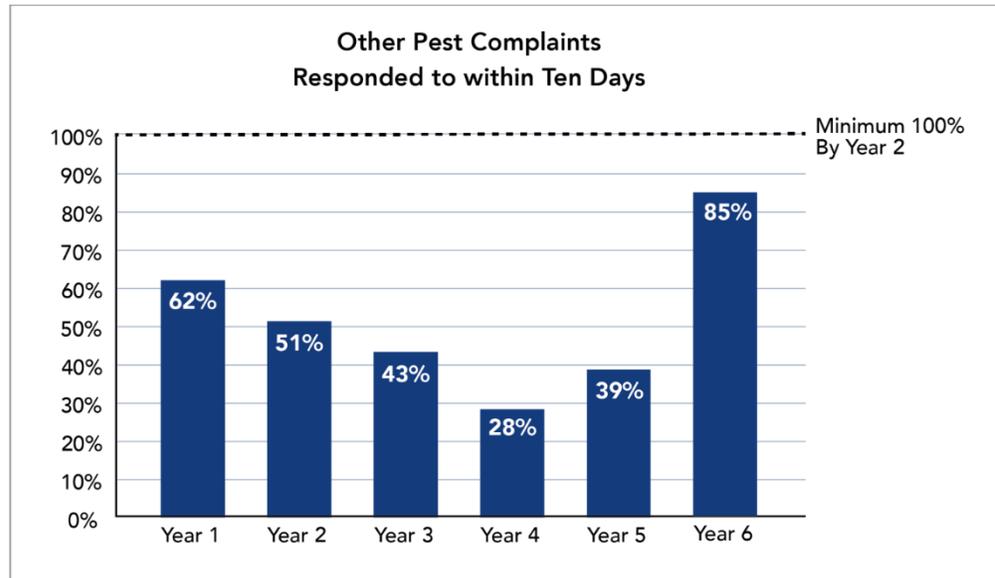
2. Respond to Other Pest Complaints (Requirement No. P15)

The HUD Agreement requires NYCHA to respond to 90% of other pest complaints within seven calendar days by the end of Year 5, and 100% of other pest complaints within ten calendar days by the end of Year 2.⁸¹

As depicted in the charts below, although NYCHA did not meet the response time requirements, it significantly improved its response times for other pests in Year 6 as compared to Year 5.



Similarly, although NYCHA does not yet respond to 100% of other pest complaints within ten calendar days, it has markedly improved its response time in Year 6 as compared to Year 5.

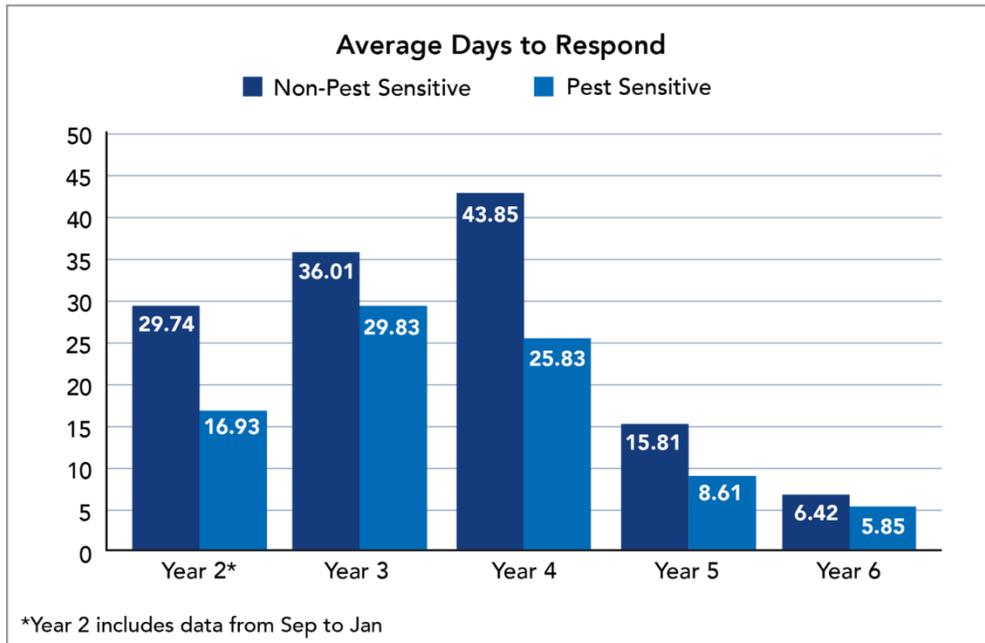


Apply: Under the definition agreed to by the First Monitor and NYCHA, this is the time from the moment a complaint is verified, to the moment that NYCHA staff completes the initial work order for inspection and initial treatment. Typically, the same NYCHA staff member who responds to the initial work order applies the initial pest control treatment during the same visit. Application of pest control methods should take, on average, forty-five minutes.

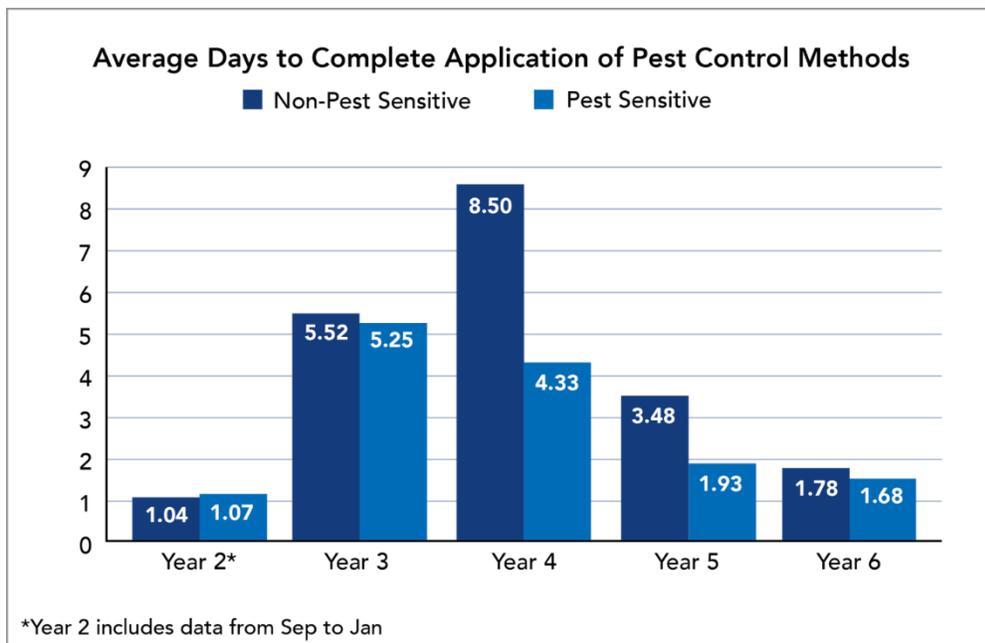
C. Address Pest Complaints from Residents with Health Conditions in an Expedited Manner (Requirement No. P17)

The HUD Agreement requires NYCHA to respond to pest complaints in apartments occupied by residents whose health conditions may be caused or exacerbated by exposure to pest infestations (“Pest Sensitive Apartments”) and to **apply** pest control methods in Pest Sensitive Apartments in an expedited manner.⁸²

The First Monitor and NYCHA agreed that to satisfy this requirement, NYCHA would address pest complaints in Pest Sensitive Units more quickly than in other apartments. As depicted in the chart below, NYCHA responded to pest complaints in Pest Sensitive Units more quickly than to other apartments in Year 6.



Likewise, and as depicted in the chart below, NYCHA applied pest control methods more quickly in Pest Sensitive Units than in other apartments in Year 6.



D. Implemented Integrated Pest Management Practices (Requirement Nos. P16, P18-P19)

The HUD Agreement requires NYCHA to consistently and comprehensively implement IPM practices.⁸³ Specifically, NYCHA must (1) apply effective pest control in a timely manner; (2) incorporate industry-standard IPM into building operations in all NYCHA developments; and (3) send staff appropriately trained in IPM to respond to all pest complaints.⁸⁴

As discussed in prior reporting, NYCHA continues to train its staff and implement IPM techniques, leading to improved compliance and services for residents.⁸⁵ However, challenges remain, particularly with ensuring consistent use of IPM practices across developments. To comply with the HUD Agreement's IPM requirements, NYCHA must ensure that all staff perform pest management in line with the **Pest Standard Procedure ("Pest SP")** and IPM techniques.

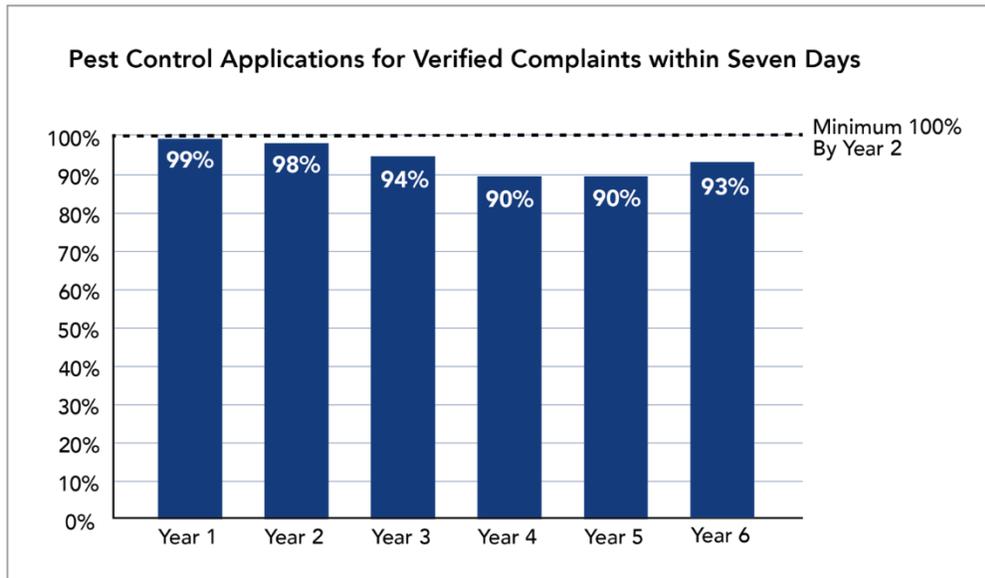
The subsections below provide an update on the progress and ongoing challenges related to the IPM requirements.

1. Apply Effective Pest Control Methods in a Timely Manner (Requirement No. P16)

Under the HUD Agreement, NYCHA must apply effective pest control methods within seven calendar days of verifying the presence of a pest.⁸⁶ As depicted in the chart below, NYCHA fell short of this requirement in Year 6.⁸⁷

Pest Standard Procedure ("Pest SP"):

The Pest SP provides instructions to NYCHA staff on how to implement and comply with preventative and responsive measures to control pest infestations. It also creates protocols to protect the health of residents, employees, and vendors when removing and reducing pest activity using IPM techniques.



2. Implement and Apply Integrated Pest Management Techniques

The HUD Agreement requires that NYCHA incorporate IPM practices into building operations at all developments and to send staff appropriately trained on IPM to respond to all pest complaints.⁸⁸ In Year 6, NYCHA made improvements, but service remains inconsistent, and staff do not always incorporate effective IPM practices in their work.

In Year 6, NYCHA took steps to achieve compliance with the IPM requirements. For instance, NYCHA hired a full-time, in-house entomologist. The entomologist will provide analytical and technical expertise and will participate in updating the Pest SP and related trainings. She will also assist in testing pest control methods and products and developing new IPM-based pest control strategies. The Monitors' consulting urban entomologists have long advocated for NYCHA to hire a full-time, in-house entomologist and view this decision as a critical factor in improving pest management. NYCHA has also collaborated with the Monitors' consulting urban entomologists to improve IPM practices by revising the Pest SP to update and improve the sections on control of cockroaches, mice, and bed bugs.

Despite these efforts, the quality of pest management services is uneven, and staff sometimes do not implement IPM-based practices effectively in their work. For instance, field reports from one

of the Monitors' consulting entomologists note that exterminators tend not to perform apartment-wide pest inspections, which are necessary for assessing the scope and location of pest infestations. The field reports also note that exterminators tend not to bring all supplies, notably step ladders. Exterminators need step ladders to conduct thorough inspections for pests in certain areas, such as on top of cabinets. And NYCHA's Pest SP requires exterminators to use step ladders when applying certain pest control methods in those areas.⁸⁹ In response to a draft of this report, NYCHA noted that it does not require exterminators to bring step ladders because exterminators frequently walk their appointment routes and carrying step ladders while doing so is physically demanding.

To improve compliance, NYCHA must prioritize high-quality, consistent delivery of IPM-based services performed in compliance with the Pest SP. NYCHA has committed to implementing several initiatives that the Monitors believe will advance this goal. NYCHA will provide management and leadership training for the Supervisors of Exterminators ("SOEs") to help SOEs better manage, educate, and hold staff accountable. Similarly, NYCHA will launch a mentorship program that will pair experienced exterminators with newer colleagues for individualized coaching and training. NYCHA also plans to perform a program evaluation of the agency-wide **snap trap** training to assess the program's effectiveness and make data-informed improvements.

Snap Trap: A snap trap is a pest control device intended to trap and eliminate rodents, using bait and a quick trigger system.

NYCHA uses snap traps to control the mouse population, in combination with other research-tested devices, rodent proofing and exclusion, and sanitation improvements.

The Monitors will continue to provide subject matter and technical expertise to NYCHA and support NYCHA's efforts to deliver pest management services in accordance with the Pest SP and IPM-based practices.

3. Address Common Area Pest Complaints

IPM practices require NYCHA to eliminate pests' access to food, water, and shelter across developments, including in common areas.

As discussed in prior reporting, NYCHA, HUD, and SDNY agreed that NYCHA must respond to common area pest complaints in a timely manner, based on timeframes proposed by the Monitors' consulting urban entomologists.⁹⁰ Specifically, NYCHA must (1) respond to 90% of rat complaints in internal common areas within two business days, and to 100% of complaints within five calendar days;

(2) respond to 100% of rat complaints in external common areas within ten calendar days; and (3) respond to 100% of other pest complaints in internal and external common areas within ten business days.⁹¹ For rat complaints in high-traffic areas like playgrounds, NYCHA must respond in an expedited manner.⁹²

To begin tracking NYCHA's progress against these response times, the terms "high-traffic areas" and "expedited manner" must be defined. Accordingly, the Monitors are working with NYCHA to define these terms and will report on the finalized definitions, NYCHA's development of a response time tracking system, and NYCHA's progress in meeting the response time requirements in future reporting.

E. Improve Waste Management (Requirement No. P11)

The HUD Agreement requires NYCHA to inspect grounds and common areas at every development for cleaning and maintenance needs and correct such conditions at least once a day ("Waste Management Requirement").⁹³ In particular, NYCHA must ensure that trash in grounds or common areas of each NYCHA development is collected and either removed from the premises or stored in a manner that prevents access by pests at least once every 24 hours.⁹⁴

To facilitate compliance with this requirement, NYCHA committed to several capital projects aimed at improving its waste management capabilities.⁹⁵ These projects include building new waste yards and trash collection systems and replacing and upgrading the agency's waste collection and hauling equipment.⁹⁶

The subsections below provide an update on (1) NYCHA's compliance with the Waste Management Requirement, as verified by the Monitors' inspection team, and (2) an update on the various waste management capital projects.

1. Inspect and Correct Negative Waste Conditions

Currently, NYCHA measures compliance with the Waste Management Requirement through Clean Compounds, an initiative that requires developments to submit daily photographs of certain areas on development grounds and attestations from grounds supervisors regarding the cleanliness of the developments to the Waste Management Department. To validate the developments' self-

reported compliance, NYCHA's Waste Management Department launched Scorecard 1.5, a reporting system whereby Waste Management inspectors perform inspections of developments' common areas and grounds, in Year 6.

Scorecard 1.5 is intended to serve as an interim measure because the application cannot be integrated with Maximo.⁹⁷ This means that Scorecard 1.5 inspectors cannot automatically generate work orders based on their observations.⁹⁸ The system's replacement, Scorecard 2.0, has been significantly delayed. According to NYCHA, the delay is due to having to build its own application rather than receiving the First Monitor's Waste Management Measure App ("WAMMA") as was originally intended and to internal IT upgrade delays. NYCHA estimates that Scorecard 2.0 will launch in October 2025, approximately six months later than previously reported to the Monitors.

To assess compliance with the Waste Management Requirement, the Monitors established an independent inspection team tasked with conducting inspections of grounds, including curbside collection points, short-term storage areas, waste yards, walkways, and common areas, including lobbies, elevators, and stairwells. The team shares the results of its inspections with NYCHA property management to help improve compliance at the development level. The Monitors have also shared the high-level results of the inspections with leadership in the Waste Management Department to help improve compliance agency-wide.

Based on this reporting, the Monitors concluded that NYCHA is in partial compliance with the Waste Management Requirement. Although the inspectors found that most developments complied with the requirement, cleanliness varied across developments. On the one hand, the inspectors observed extremely well-maintained developments. They noted clean walkways, minimal litter, and well-kept stairwells and hallways. On the other hand, the inspectors observed poorly maintained developments, noting overflowing trash receptacles, trash and waste left behind after garbage removal, and malfunctioning garbage chute doors, making it more difficult for residents to properly dispose of waste and increasing the likelihood of pest infestations. These observations indicate that some developments do not always remove or collect trash once every 24 hours in a manner that prevents pest access.

To facilitate compliance with the Waste Management Requirement, the Monitors will continue to perform independent grounds and common area inspections and will share the results with NYCHA.

2. Implement Waste Management Capital Projects

Among other measures to reduce pest populations and improve sanitation in its developments,⁹⁹ the HUD Agreement required that NYCHA install 50 **rat slabs** by December 31, 2020. As of the end of Year 6, NYCHA had installed 37 of the required rat slabs. NYCHA anticipates completing the remaining 13 rat slabs—one at Baruch Houses, five at Jacob Riis Houses I & II, and seven at Wald Houses—by October 2025, despite reported delays. Since the Monitors' Second Report, construction is progressing on two rat slabs, one at Baruch Houses and the other at Jacob Riis Houses II. NYCHA has sought regulatory approval to proceed with construction on the four rat slabs at Jacob Riis Houses I and is reporting construction delays due to leaks at Wald Houses.

Rat Slabs: Rat slabs are thin layers of concrete poured over areas of exposed sand and aggregate within basements and crawl spaces of buildings where rats burrow. They are intended to prevent rodents from establishing burrows inside buildings.

As discussed in the Monitors' Second Report, NYCHA committed to additional waste management projects using capital funds provided under the **City Capital Action Plan ("CCAP")**.¹⁰⁰ Since the Monitors' Second Report, NYCHA has completed two waste yards and four interior compactors. As of January 31, 2025, NYCHA has installed 405 interior compactors and completed eight waste yards. The Monitors will continue to track NYCHA's progress and provide updates in future reporting.

City Capital Action Plan ("CCAP"): Under the HUD Agreement, New York City must provide \$2.2 billion in capital funding to NYCHA over a ten-year period starting in 2019 (\$250 million per year for the first four years, and \$200 million per year for the final six years). These funds are committed to capital projects and can only be spent pursuant to an Action Plan. The City Capital Action Plan was approved by the First Monitor on May 8, 2021, and was amended in September 2023.

F. Completed, In Compliance, and Superseded Obligations

The HUD Agreement obligations that NYCHA met before the period covered by this report, or that were superseded by other obligations (**Requirement Nos. P1, P3-P6, P12-P13, P17**) are listed in Appendix A.

Overview of Outstanding Pests & Waste Obligations

The following table summarizes the status of NYCHA's compliance with the outstanding requirements of the HUD Agreement as of January 31, 2025, unless otherwise noted. The table categorizes each requirement as a one-time requirement (blue); occurrence obligation (yellow); response obligation (orange); or policy and practice obligation (green).

Req. No.	Description	Status	Compliance Details
One-Time Requirements			
P2 (Ex. B ¶ 46(b))	Rat Slabs: By December 31, 2020, NYCHA must install 50 rat slabs.	74%	NYCHA has installed 37 of 50 rat slabs as of October 31, 2024, and expects to complete 13 more rat slabs by October 2025.
P7 (Ex. B ¶ 35)	Pest Population Protocols: The Monitors shall establish reasonable protocols by which IPM professionals can develop and provide reliable estimates, at least quarterly, of the pest populations at each NYCHA development by July 31, 2019.	Complete	The Monitors established reasonable protocols by which reliable estimates of pest populations can be developed and published.
Occurrence Obligations			
P8 (Ex. B ¶ 35)	Pest Population Publication: NYCHA shall publish reliable	Incomplete	Now that reasonable protocols have been established, NYCHA is in the process of

Req. No.	Description	Status	Compliance Details
	estimates of the pest populations at each NYCHA development on its website quarterly starting by July 31, 2019.		<p>developing the infrastructure to report and publish reliable pest population estimates for each NYCHA development quarterly.</p> <p>NYCHA projects that publication will begin in April 2026.</p>
P9 (Ex. B ¶ 36)	<p>Pest Population Reduction Targets I: Beginning in Year 3, NYCHA shall achieve (i) a 50% reduction in its rat population; (ii) 40% reduction in its mice and cockroach populations; and (iii) a percentage reduction in its bedbug population determined by the Monitors.¹⁰¹</p>	<p>Partially met</p> <p>Met: Bed Bug, -62%</p> <p>Not met: Rat, +10% Mouse, -41% Cockroach, -56%</p>	<p>By the end of Year 3, NYCHA had:</p> <p>(i) increased its rat population by 10%, (ii) reduced its mouse population by 41% and its cockroach population by 56%, and (iii) reduced its bed bug population by 62% (after the Monitors determined that a 40% reduction in bed bugs was the appropriate reduction percentage).</p>
P10 (Ex. B ¶ 37)	<p>Pest Population Reduction Targets II: Beginning in Year 5, NYCHA shall achieve a further 50% reduction of all pest populations.</p>	<p>Partially met</p> <p>Met: Bed Bug, -77%</p> <p>Not met: Rat, -7% Mouse, -59% Cockroach, -62%</p>	<p>By the end of Year 6, NYCHA had:</p> <p>(i) reduced its rat population by 43%, (ii) reduced its mouse population by 70% and its cockroach population by 70%, and (iii) reduced its bed bug population by 84%.</p>

Req. No.	Description	Status	Compliance Details
P11 (Ex. B ¶ 45)	<p>Waste Management: Beginning in Year 1, NYCHA shall inspect the grounds and common areas of each building for cleaning and maintenance needs at least every 24 hours. In particular, NYCHA shall ensure that trash on the grounds or common areas of each NYCHA development is collected and either removed from the premises or stored in a manner that prevents access by pests.</p>	Partial compliance	Although NYCHA has made progress in achieving the Waste Management Requirement, the Monitors' independent inspections indicate that NYCHA's performance is inconsistent across developments.
Response Metrics			
P14 (Ex. B ¶ 39(a))	<p>Rat Response II: Beginning in Year 5, NYCHA shall respond to (i) 90% of all rat complaints within two business days and (ii) all rat complaints within five days.</p>	Substantial compliance (i): 97% (ii): 98%	Although NYCHA did not meet these requirements by January 31, 2024, as of January 31, 2025, NYCHA complies with the first requirement and nearly complies with the second.

Req. No.	Description	Status	Compliance Details
P15 (Ex. B ¶ 39(b))	<p>Other Pest Response II: Beginning in Year 5, NYCHA shall respond to 90% of all other pest complaints within seven days and to all other pest complaints within ten days.</p>	Not in compliance (i): 65% (ii): 85%	NYCHA does not yet comply with this requirement.
P16 (Ex. B ¶ 38(c))	<p>Effective Pest Control Application: By January 31, 2021, NYCHA shall apply effective pest control methods to address complaints within seven calendar days.</p>	Not in compliance 93%	NYCHA does not yet comply with this requirement.
Policy and Practice Requirements			
P18 (Ex. B ¶ 43)	<p>IPM Practices: By January 31, 2020, NYCHA shall incorporate industry standard IPM practices into building operations in all developments.</p>	In progress	<p>NYCHA has improved its pest management practices and upgraded and expanded its trainings.</p> <p>However, NYCHA does not yet consistently and/or effectively use IPM practices in building operations across all developments.</p>
P19 (Ex. B ¶ 44)	<p>IPM Training: By January 31, 2020,</p>	In progress	NYCHA has developed a training program that

Req. No.	Description	Status	Compliance Details
	NYCHA shall send staff appropriately trained on IPM to respond to any pest complaint.		incorporates IPM techniques and continues to improve training for exterminators and their supervisors, including the creation of higher-quality training materials. However, NYCHA does not yet consistently send staff appropriately trained on IPM to respond to all pest complaints.

I.4 Mold & Leaks

The HUD Agreement requires NYCHA to timely remediate mold and leaks, prevent mold growth and recurrence, and stop NYCHA employees from improperly closing work orders.¹⁰² The Agreement also requires NYCHA to comply with a separate set of obligations established by court orders in a federal class action lawsuit, ***Baez v. NYCHA, No. 13 Civ. 8915 ("Baez")***, brought by NYCHA residents to address mold and leaks in NYCHA developments.¹⁰³

The subsections below provide an update on NYCHA's compliance with the outstanding mold and leak requirements under the HUD Agreement in Year 6.¹⁰⁴

In Year 6, NYCHA's compliance decreased across several mold and leak requirements as compared to Year 5. In Year 6:

- NYCHA removed or remediated mold and its root cause(s) within specified time frames 9% of the time, compared to 11% of the time in Year 5.
- NYCHA removed mold within five business days 7% of the time, compared to 9% of the time in Year 5.
- NYCHA remediated mold and its root cause(s) via simple repairs within seven days 18% of the time, compared to 32% of the time in Year 5.
- NYCHA remediated mold and its root cause(s) via complex repairs within 15 days 3% of the time, compared to 4% of the time in Year 5.

Moreover, the backlog of mold and leak work orders increased from 72,716 work orders in Year 5 to 74,259 work orders in Year 6.¹⁰⁵ These results underscore the need to continue improving NYCHA's response to mold and leak issues.

NYCHA has stated that it is committed to improving and has engaged in several initiatives to do so. For example, in Year 6, NYCHA continued Operation Mold Cleanup and Operation Dry Out, two initiatives that prioritize closing open mold cleaning and mold-resistant paint work orders and plumbing and tub enclosure work

Baez v. NYCHA, No. 13 Civ. 8915 ("Baez"):

Baez is a federal class action lawsuit brought by NYCHA residents suffering from asthma and living in apartments with mold and excessive moisture. NYCHA settled *Baez* in 2014. The resulting consent decrees impose various requirements on NYCHA that are similar but not identical to the HUD Agreement obligations and aim to help NYCHA effectively remediate mold and moisture in a timely manner.

orders, respectively. In Year 6, NYCHA completed approximately 5,275 mold cleaning and mold-resistant paint work orders through Operation Mold Cleanup and approximately 4,358 plumbing and tub enclosure work orders through Operation Dry Out. These initiatives build on work NYCHA has done over several years to improve its performance on the HUD Agreement's mold and leak requirements, which the Monitors have described in prior reports.¹⁰⁶

Looking to Year 7, NYCHA must continue to build on these efforts to reverse decreasing performance in Year 6. With respect to the backlog, NYCHA has prioritized existing initiatives intended to target and close specific mold and leak work orders. It is also working with the Monitors, SDNY, and HUD to develop a new initiative that will initially focus on closing complex mold and leak work orders in the highest-need apartments.

NYCHA also maintained or improved upon some of its efforts in Year 6. For example, NYCHA complied with the HUD Agreement requirement that there must not be a second mold complaint for the same apartment, common area room, or hallway within a 12-month period at least 85% of the time. NYCHA has consistently complied or substantially complied with this requirement—an important achievement..

In addition, NYCHA continued its efforts to improve ventilation by replacing volume and fire dampers, devices that control air flow, thereby reducing sustained moisture, a root cause of mold. In Year 6, NYCHA installed approximately 17,173 dampers.

Further, NYCHA continued to make progress on its Comprehensive Modernization ("Comp Mod") and Building Line Initiative ("BLI") programs, which are large-scale infrastructure programs that address the root causes of mold.¹⁰⁷ The Comp Mod program remains on budget, with Todt Hill Houses proceeding on schedule and Saint Nicholas Houses recently experiencing a six-week delay that NYCHA does not expect to impact the project's completion date.¹⁰⁸ However, BLI projects are facing delays, with the completion date for Tompkins Houses being pushed back by nine months until December 2025 due to unforeseen complications with retaining a subcontractor for electrical work. In addition, construction at Red Hook East Houses has been postponed to align with the updated Tompkins Houses schedule and ensure appropriate resource allocation to both properties.¹⁰⁹ NYCHA plans to begin relocating

Red Hook East Houses residents in May 2025 and will commence work on the apartments once they become vacant.

The Monitors will continue to track and report on NYCHA's efforts to comply with the outstanding mold and leak requirements.

A. Timely Remediation of Mold and Leaks (Requirements Nos. M5-M7)

The HUD Agreement requires NYCHA to timely address residents' mold and leak complaints. Specifically, NYCHA must timely (1) remove or remediate mold and its root cause(s) within specified timeframes; (2) provide residents with work plans that explain how NYCHA will address mold and its root cause(s); and (3) abate the root cause(s) of sustained moisture and remove all resulting standing water (collectively, the "Response-Time Requirements").¹¹⁰ The Monitors address NYCHA's progress toward meeting each Response-Time Requirement below.

1. Removal and Remediation of Mold (Requirement No. M6)

The HUD Agreement requires NYCHA to **remove** or **remediate** mold and its root cause(s) within specified timeframes at least 95% of the time.¹¹¹

The timeframes NYCHA must meet when addressing residents' mold complaints depend on the complexity of the repair work. Under the HUD Agreement, NYCHA must remove mold within five business days of a resident's mold complaint or remediate mold and its root cause(s) within seven days for a **simple repair** or 15 days for a **complex repair**.¹¹²

The rate at which NYCHA removes or remediates mold and its root cause(s) within these specified timeframes is known as the "blended rate."

Year 6, NYCHA's compliance with the blended rate and the mold removal and remediation timeframes decreased as compared to Year 5.

a. Blended Rate

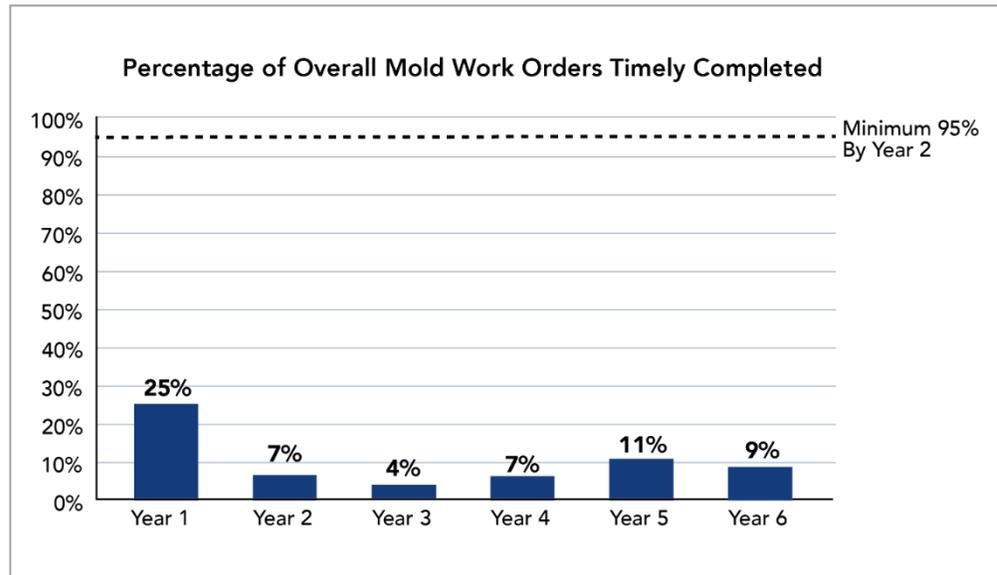
Remove: Removing mold refers to cleaning visible mold, removing building materials with mold, and applying mold-resistant paint.

Remediate: Remediating mold means addressing mold and its root causes. Remediation might include repairing a section of leaky pipe and replacing the mold-covered wall containing the pipe.

Simple Repair: A simple repair is one that can be performed by a Maintenance Worker or Caretaker X Worker. An example of a simple repair is the repair of an inoperable bathroom window by a Maintenance Worker.

Complex Repair: A complex repair is one that must be performed by Skilled Trade Workers or other specialized staff.

As illustrated in the graph below, NYCHA is substantially out of compliance with the blended rate. NYCHA complied with the blended rate requirement 9% of the time in Year 6, compared to 11% of the time in Year 5.



NYCHA attributes its substantial noncompliance with the blended rate and the mold removal and remediation timeframes in large part to systemic factors, including the lack of funding to upgrade NYCHA's aging infrastructure, the complexity of mold remediation, the mold and leak work order backlog, and the skilled trades staffing shortage.

NYCHA also points to specific restrictions on closing mold and leak work orders as a contributing factor to its substantial noncompliance and the decrease in compliance in Year 6. Under NYCHA policy, a mold and leak work order cannot be closed if there is no record of work being performed, even if the resident repeatedly misses appointments or refuses to grant entry to their apartment.¹¹³ By contrast, a non-mold or leak-related work order may be closed under certain circumstances after NYCHA makes a certain number of entry attempts. According to NYCHA, this results in mold and leak work orders remaining open for prolonged periods of time, which, in turn, inflates NYCHA's response-time rates. In support of this position, NYCHA cites an analysis in which it reviewed the number of attempts it made to complete 25 of the oldest mold cleaning work orders assigned to painters, finding that on average NYCHA made 15

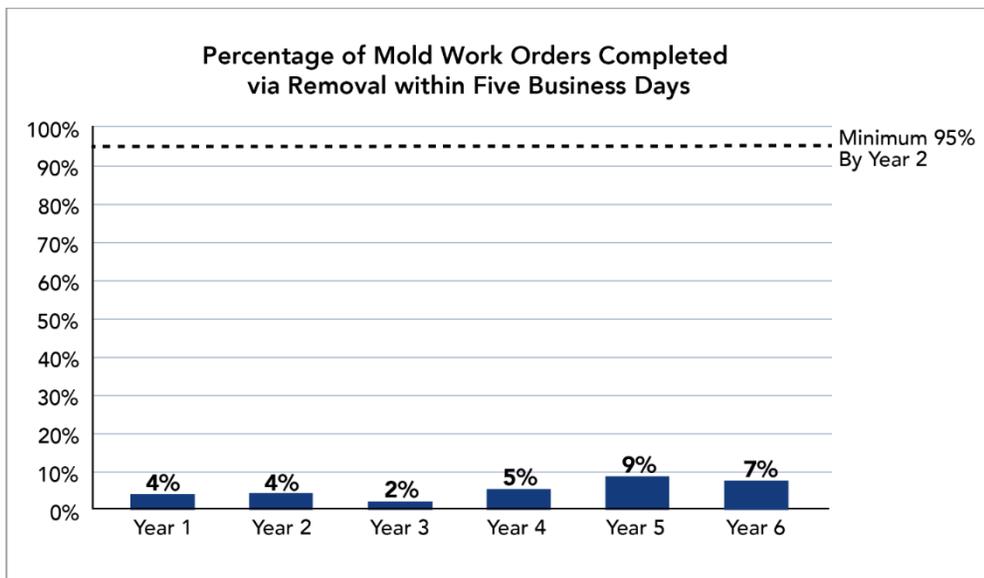
attempts to complete the work. The Monitors will assess the results of this analysis once received.

The following subsections set out NYCHA's performance meeting the mold removal and remediation timeframes that make up the blended rate.

b. Mold Removal

If NYCHA elects to comply with the HUD Agreement via mold removal, it must remove mold within five business days of a resident's mold complaint.¹¹⁴ Mold removal consists of three steps: **mold cleaning**, **fixture removal**, and **application of mold-resistant paint**.

As illustrated in the graph below, NYCHA removed mold within five business days of a resident's mold complaint 7% of the time in Year 6 compared to 9% of the time in Year 5.



c. Simple Repairs

If NYCHA elects to comply with the HUD Agreement via simple repair, NYCHA must perform the repair within seven days of a resident's complaint.¹¹⁵

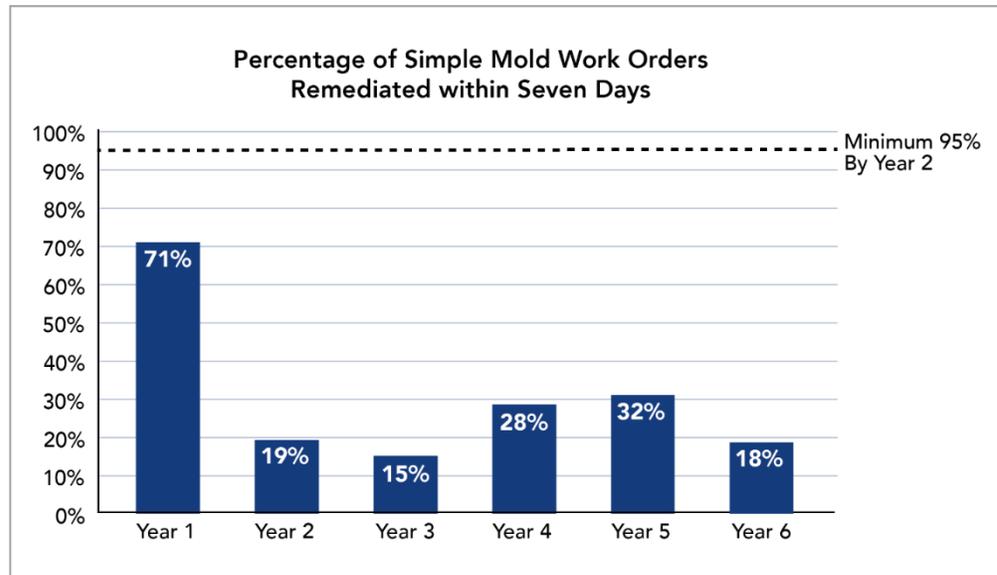
As illustrated in the graph below, NYCHA remediated mold and its root cause(s) via simple repair within seven days 18% of the time in Year 6 compared to 32% of the time in Year 5.

Mold Cleaning: To clean mold, NYCHA staff or a vendor apply a mold-specific cleaning detergent and disinfectant with as-needed manual mold removal with a brush.

Fixture Removal: Fixtures, including cabinetry, sheet rock, or floor tiles, that have been damaged by mold must be removed.

Application of Mold-Resistant Paint: To prevent recurrence, antimicrobial, mold-resistant paint is applied to walls after mold is removed.

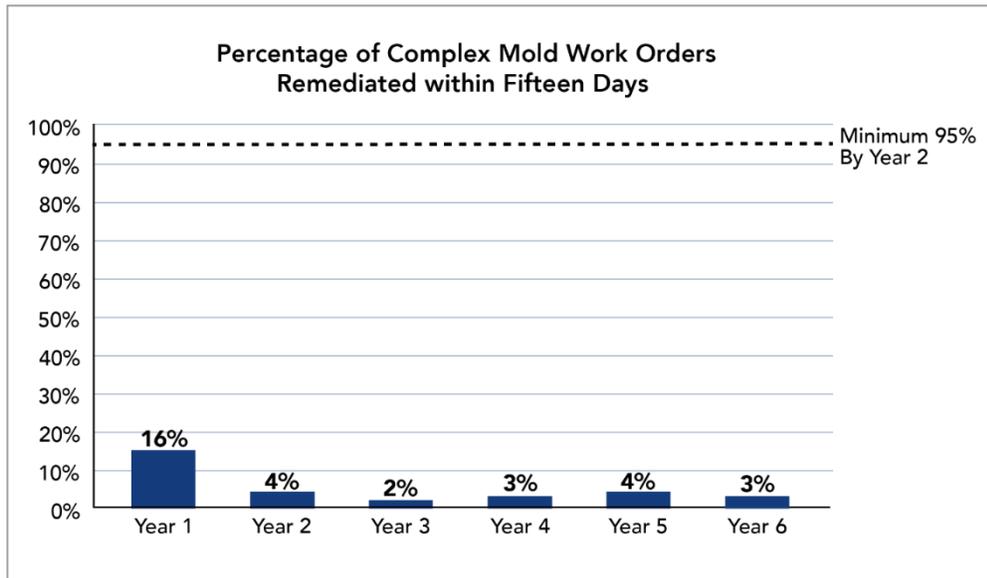
NYCHA notes that simple repairs make up a small percentage of the universe of mold and leak work orders. In Year 6, NYCHA completed 69 simple repair work orders within seven days, out of a total of 376 simple repair work orders. By comparison, in Year 5, NYCHA completed 142 simple repair work orders within seven days, out of a total of 437 simple repair work orders.



d. Complex Repairs

If NYCHA elects to comply with the HUD Agreement via complex repair, NYCHA must perform the repair within 15 days of a resident's complaint.¹¹⁶

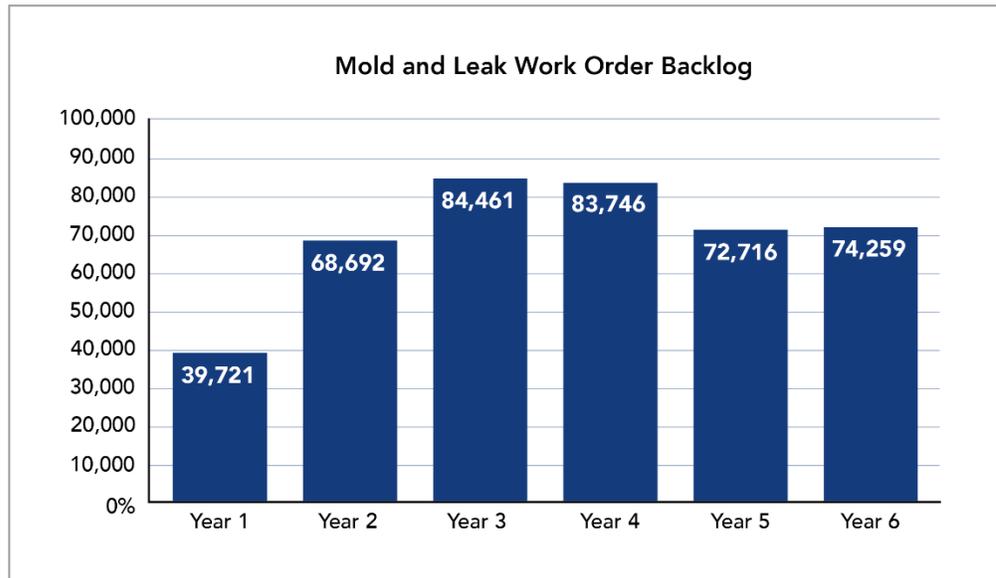
As illustrated in the graph below, when NYCHA remediated mold and its root cause(s) via complex repair, it did so within 15 days 3% of the time in Year 6, compared to 4% of the time in Year 5.



e. Mold and Leak Work Order Backlog

The backlog of open mold and leak work orders is a significant constraint that prevents NYCHA from reaching compliance with the mold removal and remediation requirements. The backlog includes both work orders concerning active mold or health and hazard conditions, as well as follow-up repairs or cosmetic work to be completed after the mold or leak issue is addressed.

As illustrated in the graph below, in Year 6, the backlog grew¹¹⁷ by 1,543 work orders from Year 5.¹¹⁸ This growing backlog illustrates residents' concerns about how long they must wait for mold and leak work orders to be addressed.



To reduce the backlog, NYCHA has implemented initiatives aimed at completing specific mold and leak work orders. For example, in 2022, NYCHA launched Operation Mold Clean Up (“OMC”), an authority-wide effort to target and complete mold removal and mold-resistant paint work orders by deploying specialized staff and seasonal workers to assist developments.¹¹⁹ From the program’s inception in May 2022 to December 2024, NYCHA completed 29,486 work orders. NYCHA aims to complete an additional 7,003 work orders in Year 7.

Work Plan: A work plan is a document that a mold inspector generates after their inspection, containing a description of the inspection and root cause findings, a list of next steps to address the mold and its root cause, and instructions on how to prevent mold and its root cause in the future. Under the Mold SP, a work plan is automatically generated following a verified mold inspection.

The Monitors recognize NYCHA’s hard work, and the fact that more work will be required to improve NYCHA’s performance. To that end, NYCHA, with HUD, SDNY, and the Monitors’ support, has been working diligently to develop an initiative focused on completing complex mold and leak work orders in apartments with the worst conditions. The Monitors will continue to collaborate with NYCHA to execute a plan that significantly reduces the mold and leak work order backlog and materially improves conditions in the highest-need apartments.

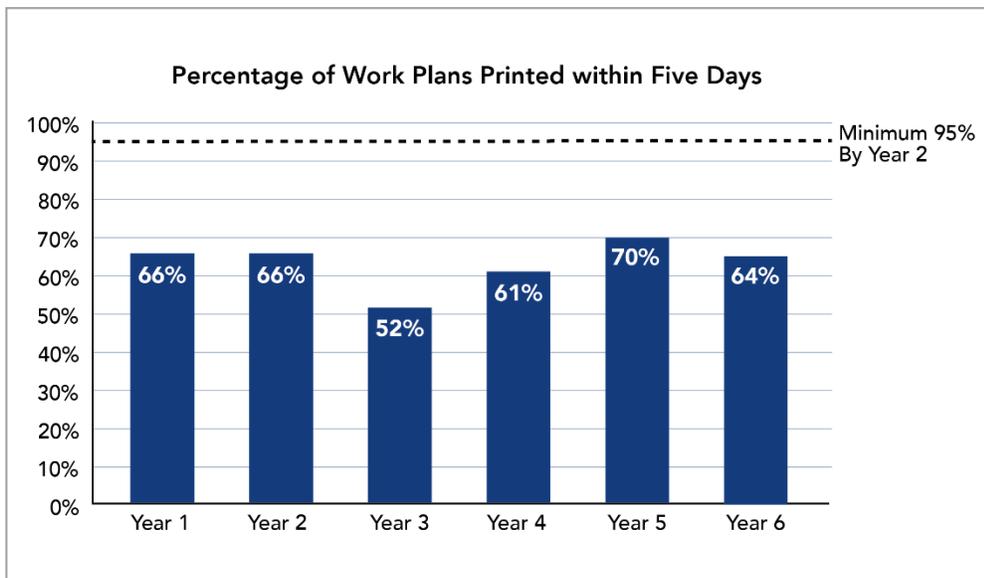
2. Work Plan Distribution (Requirement No. M5)

Under the HUD Agreement, NYCHA is required to provide a resident with a **work plan** that explains how NYCHA will address the mold and its root cause(s) within five business days of the resident’s verified mold complaint at least 95% of the time.¹²⁰ Before NYCHA

can provide a resident with a work plan, a NYCHA **mold inspector** must first perform a mold inspection.

To assess compliance with this requirement, NYCHA uses a proxy measurement. Under the proxy, NYCHA measures the time it takes to *print* the work plan, rather than the time it takes to deliver the work plan from the central location at which it is printed.¹²¹

As illustrated in the graph below, NYCHA printed work plans within five business days 64% of the time, compared with 70% of the time in Year 5.



NYCHA attributes the decrease in compliance with this requirement to routine and expected fluctuations. NYCHA also notes that although the percentage of work plans printed within five business days declined in Year 6, the median days to complete mold inspections has improved, decreasing from over 24 days when NYCHA began tracking this measurement on March 24, 2022, to under four days as of January 31, 2025.

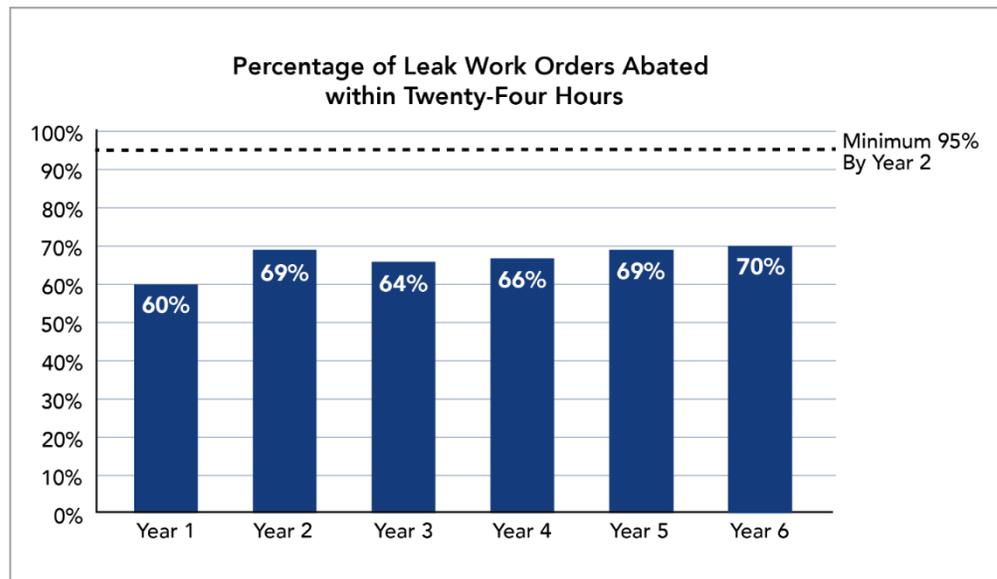
3. Abating Floods, Leaks from Above, and Other Moisture Conditions (Requirement No. M7)

Under the HUD Agreement, NYCHA is required to abate floods, leaks from above, and other conditions that cause sustained or recurrent moisture to flow into a resident's apartment or apartment's walls ("Other Moisture Conditions") within 24 hours of a

Mold Inspector: A mold inspector is a Property Maintenance Supervisor, Assistant Property Maintenance Supervisor, Property Manager, or Maintenance Worker who is trained and authorized to perform initial mold inspections. A mold inspector must complete the Mold Inspector and Building Sciences Trainings before performing such inspections.

resident's complaint.¹²² NYCHA must also remove any resulting standing water within 48 hours of a resident's complaint at least 95% of the time.¹²³

As illustrated in the graph below, NYCHA remained out of compliance with this requirement in Year 6. NYCHA did, however, abate floods, leaks from above, and Other Moisture Conditions within 24 hours 70% of the time as compared to 69% of the time in Year 5.



The Monitors cannot provide an update on NYCHA's compliance with the second part of the requirement—that NYCHA remove standing water within 48 hours of a resident's complaint—because NYCHA does not measure its compliance with this metric, and will not be able to do so until it finalizes and implements its leak standard procedure ("**Leak SP**").¹²⁴

Leak Standard Procedure ("Leak SP**"):**

A standardized process for identifying, tracing, and addressing the root causes of leaks across all NYCHA developments.

In addition to allowing the Monitors to assess whether NYCHA timely removes standing water from residents' apartments, the Leak SP will provide NYCHA staff with standardized, best-practice processes for identifying, tracing, and fixing leaks and their root cause(s).¹²⁵ This, in turn, will allow NYCHA to perform more consistent, higher-quality repair work, which will reduce sustained moisture conditions, a major cause of mold.¹²⁶

As discussed in the Monitors' December 2024 Report, NYCHA informed the Monitors that it would need to "reimagine" the Leak SP due to unanticipated IT limitations in October 2024.¹²⁷ NYCHA has

since reconfigured the workflow for the Leak SP. And it maintains that the Leak SP will achieve its original aims and roll out on schedule.¹²⁸ According to NYCHA, it will finalize the Leak SP in May 2025, begin tracking compliance with the HUD Agreement requirement in January 2026, and deploy the Leak SP authority-wide by December 2026.

Together with the **Independent Mold Analyst (“IMA”)** and the **Independent Data Analyst (“IDA”)**, the Monitors will continue to provide feedback to NYCHA on the Leak SP.

B. Prevention of Mold Growth and Recurrence (Requirements Nos. M2-M4)

The HUD Agreement requires NYCHA to prevent mold from growing and recurring (the “Occurrence Requirements”).¹²⁹ The following subsections set out NYCHA’s progress in meeting the Occurrence Requirements and provide an update on NYCHA’s efforts to improve compliance.

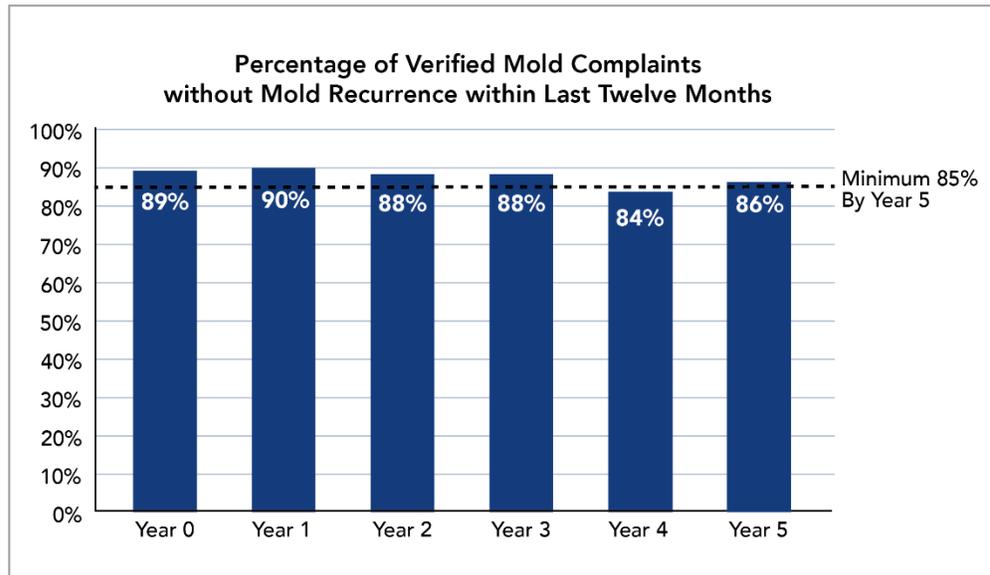
1. Recurrence of Verified Mold Complaints (Requirement No. M2)

Under the HUD Agreement, for 85% of verified mold complaints there must not be a second verified mold complaint for the same apartment, common area room, or hallway within a 12-month period.¹³⁰ For this requirement, the period from February 1, 2024, up to and including January 31, 2025, is Year 5 instead of Year 6 because this requirement measures recurrence over a backward-looking 12-month period.

As illustrated in the graph below, NYCHA was compliant with this requirement in Year 5 after failing to comply in Year 4.¹³¹

Independent Mold Analyst (“IMA”): The IMA is an entity appointed under the *Baez* Consent Decree to perform quality assurance by inspecting a certain number of randomly selected apartments on a quarterly basis. The IMA also reports on its findings and makes recommendations for improved compliance.

Independent Data Analyst (“IDA”): The IDA is an entity appointed under a *Baez* Consent Decree to help the parties and Special Master develop a reporting system to track NYCHA’s compliance with its obligations under *Baez*. The IDA is also tasked with reviewing and confirming the accuracy of the reporting and recommending improvements.

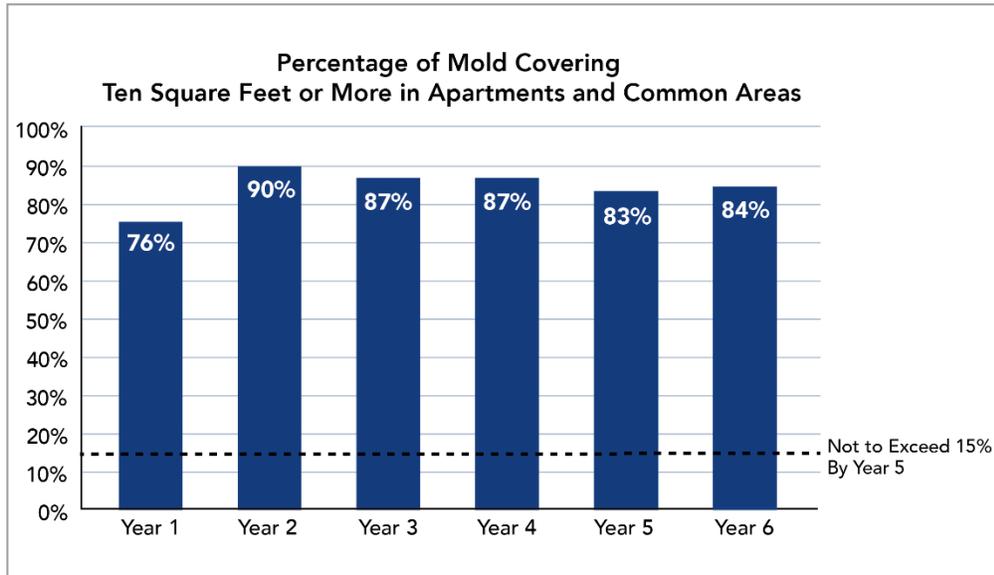


The Monitors commend NYCHA for consistently complying or substantially complying with this requirement. Doing so requires significant effort and coordination across NYCHA to ensure that mold and its root causes are properly identified, assessed, and repaired to prevent recurrence.

2. Existence of Large Mold Growths (Requirement No. M3)

Under the HUD Agreement, no more than 15% of mold complaints verified by a NYCHA employee may be for visible mold covering ten or more square feet ("Large Mold Growths").¹³²

As illustrated in the graph below, NYCHA remained substantially out of compliance with this requirement in Year 6, reporting that 84% of verified mold complaints concerned Large Mold Growths.



NYCHA attributes its noncompliance with the Large Mold Growths requirement in part to residents' failure to proactively report visible mold, though NYCHA and the IMA agree that NYCHA residents report mold on approximately the same timeline as non-NYCHA residents. According to NYCHA, early detection and reporting of mold is critical. Moving forward, NYCHA anticipates that its effort to inspect 100% of apartments pursuant to NSPIRE standards will help enable early mold identification and improve compliance with this requirement.

To begin to understand why NYCHA reports such a high proportion of Large Mold Growths, the Monitors and the IMA undertook a preliminary inquiry into NYCHA's performance. As a first step, the Monitors and the IMA analyzed a small sample of work orders, comparing the size of the mold growth reported by the NYCHA mold inspector to a corresponding photograph of the mold growth taken by the IMA.

Although the data set was small—consisting of 55 work orders—and more investigation is required, the analysis indicates that NYCHA mold inspectors may be overestimating the size of mold growths. The IMA estimated that 26% of those 55 mold growths were Large Mold Growths, and the remaining 74% were not Large Mold Growths. By comparison, NYCHA mold inspectors estimated that 70% of those mold growths were Large Mold Growths, and 30% were not. Though these findings are preliminary, if they apply to the general population

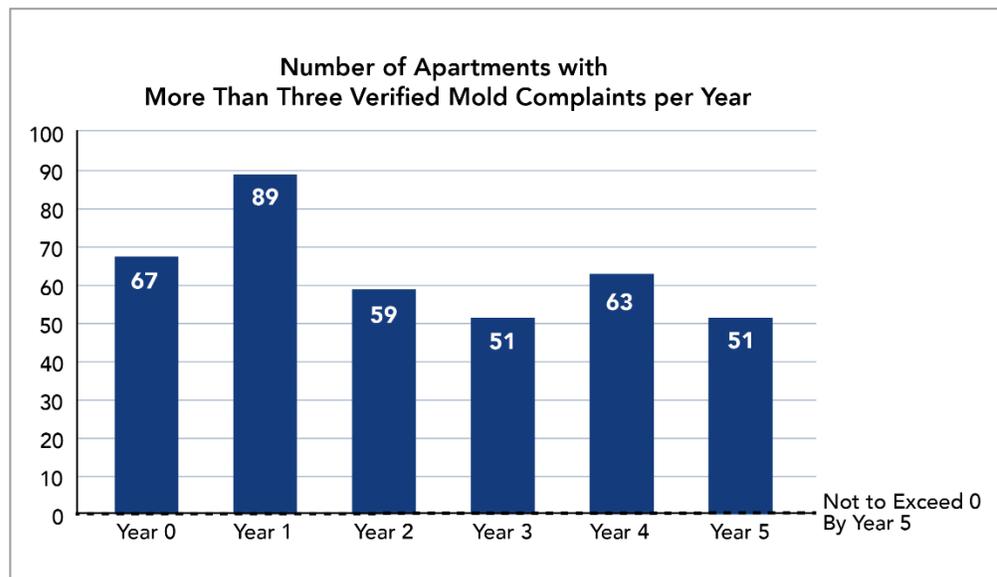
of NYCHA-inspected mold growths, they would have a material effect on NYCHA's rate of compliance.

The Monitors, the IMA, and NYCHA are further investigating. And, as discussed in greater detail below, the Monitors, the IMA, and NYCHA will continue to improve and expand NYCHA's mold inspection trainings so that inspectors can more accurately measure and report the size of mold occurrences.

3. Recurrence of Mold (Requirement No. M4)

Under the HUD Agreement, mold must not occur more than three times in a single apartment over a 12-month period.¹³³ For this requirement, the period from February 1, 2024, to and including January 31, 2025, is considered Year 5 instead of Year 6 because this requirement measures recurrence over a backward-looking 12-month period.

Although NYCHA was not in compliance in Year 5, it made progress in meeting this requirement. In Year 5, there were 51 apartments with more than three verified mold complaints—tied for the fewest since the outset of the monitorship.¹³⁴



4. Initiatives to Address Mold Growth and Recurrence

To improve compliance with the Occurrence Requirements, NYCHA is pursuing several training and capital-related projects.¹³⁵ The following subsections provide an update on Year 6 progress.

a. Mold Trainings

When mold and its root cause(s) are properly identified and the correct next steps are proposed during the mold inspection, mold is less likely to reoccur. Accordingly, it is critical that mold inspectors receive sufficient training and resources. To ensure that this is the case, NYCHA is working with the IMA and the Monitors to improve training and instruction on mold inspections.

For instance, NYCHA is updating the mandatory mold inspector trainings, the Mold Inspector Training, and the Building Sciences Training, to reflect updates to the Mold Standard Procedure (the "Mold SP") and to better address topics with which inspectors struggle in the field.¹³⁶ Among other things, the trainings will now include videos filmed by the IMA at NYCHA developments, explaining how to open a section of wall to inspect for and correct probable root cause(s) of a mold growth or leak, and a case study instructing inspectors on how to appropriately identify mold growing on bathroom caulking and how to correctly schedule follow-up repairs. NYCHA anticipates that these training courses will be updated and implemented by April 2025.¹³⁷

NYCHA and Environmental Education Associates ("EEA"), the company that creates and presents NYCHA's mold trainings, also plan to develop and implement end-of-course exams to test trainees' understanding of the material, which trainees must pass before performing mold inspections. NYCHA plans to pilot a comprehension exam for the Mold Inspector training in July 2025.¹³⁸

NYCHA is also developing more resources to help improve mold inspectors' performance. First, NYCHA, with the IMA, is drafting advisories that will instruct mold inspectors on how to correctly complete tasks with which the mold inspectors have difficulty. For example, NYCHA will publish an advisory that explains how to identify and trace leaks from above. NYCHA will also publish an advisory focusing on how to properly estimate the size of mold.

Finally, NYCHA is working to provide further support to poorly performing mold inspectors.¹³⁹ NYCHA is conducting an analysis to

identify poorly performing NYCHA staff to receive supplemental training. NYCHA anticipates that this analysis will be completed by April 2025 and follow-up training will occur thereafter.

b. Mold Related Capital Projects

As discussed in previous reporting, NYCHA has launched the Comprehensive Modernization (“Comp Mod”) and Building Line Initiative (“BLI”) programs to address infrastructural causes of mold growth and recurrence.¹⁴⁰ Through the Comp Mod program, selected NYCHA developments undergo large-scale renovations, including roof and façade repairs, plumbing replacements, ventilation upgrades, and kitchen and bathroom renovations to resolve recurrent leaks and moisture conditions.¹⁴¹ This program also comprehensively addresses other significant issues related to lead-based paint, heating, elevators, pests, and waste management.¹⁴² Through BLI, NYCHA renovates specific apartment lines in buildings by replacing high-leak plumbing lines that frequently impact apartments and common areas.¹⁴³ These programs are crucial to updating aging infrastructure that contributes to mold growth and recurrence and cannot be addressed through targeted repairs in individual apartments.

To continue to build on the progress of these initiatives, NYCHA plans to reallocate \$50 million through the City Capital Action Plan (“CCAP”) to a new Waste Plumbing Initiative (“WPI”) that builds on and expands the BLI program, to address widespread plumbing issues in certain developments. New York City’s Office of Management and Budget (“OMB”) has approved NYCHA’s plan, and the Monitors are reviewing while NYCHA identifies developments with several heavily deteriorated waste plumbing lines for this project.

i. Comprehensive Modernization

Since the Monitors’ December 2024 Report, the Comp Mod program, administered by NYCHA’s Asset and Capital Management Division (“A&CM”) and managed by design-build vendors retained by NYCHA, has continued to make progress and remain on budget.¹⁴⁴ While work at Todt Hill Houses is on schedule, construction at St. Nicholas Houses has experienced an approximately six-week delay due to inconsistencies in the project schedule and a slower-than-anticipated pace of work.¹⁴⁵ According to NYCHA, it is closely

monitoring the situation, and the overall project completion date remains unchanged.¹⁴⁶

At Todt Hill Houses, NYCHA's design-build vendor is relocating residents in two buildings as part of the first phase of the project, assisting them in finding temporary apartments and assessing relocation needs for the next phase.¹⁴⁷ According to NYCHA, the relocation process has been successful so far. As of January 31, 2025, 24% of residents in the first phase of the project have moved into their temporary apartments.¹⁴⁸ The design-builder has reached its 60% design milestone and is working toward its 90% milestone, while proactively coordinating with Con Ed to plan for electrical infrastructure upgrades.¹⁴⁹ The design-builder has begun testing for and abating lead in vacant apartments at Todt Hill Houses.¹⁵⁰

At St. Nicholas Houses, the pre-construction process is underway. The design-builder is continuing construction on the model apartment, incorporating finishes chosen by the residents.¹⁵¹ The design-builder reached its 30% design milestone and began working toward its 60% design milestone, completed a survey of the property, including cellars and crawl spaces, tested for lead in all common and public spaces, and is coordinating with Con Ed to plan for electrical infrastructure upgrades.¹⁵² The design-builder is also preparing to relocate residents in two buildings beginning in May 2025 as part of the first phase of the project.¹⁵³

ii. Building Line Initiative

NYCHA has two ongoing BLI projects—one at Tompkins Houses (85 Tompkins Avenue) impacting 15 apartments and another at Red Hook East Houses (167 Bush Street) impacting six apartments.¹⁵⁴ In 2022, NYCHA completed its first BLI project at Red Hook East Houses, where before-and-after photographs illustrate the substantial improvements. According to NYCHA, mold-related complaints have not recurred at the apartments impacted by this earlier project, underscoring the effectiveness of these remediation efforts.¹⁵⁵



progress photos from the BLI program

Both current projects are managed by NYCHA's Office of Mold Assessment and Remediation ("OMAR"). As a smaller and more specialized unit compared to A&CM, OMAR does not have the same breadth of resources available to oversee extensive construction work. Nevertheless, it has undertaken these crucial restorations and coordinates with other departments as needed.¹⁵⁶

At Tompkins Houses, unforeseen complications with retaining a subcontractor for electrical work have extended the anticipated completion date from March 2025 to December 2025, and OMAR notified residents of this delay in January 2025. The photographs below illustrate the severity of the conditions, including the extent of the mold and structural damage being addressed.¹⁵⁷



Pipes to be replaced at Tompkins Houses

At Red Hook East Houses, NYCHA has continued its resident engagement efforts and anticipates beginning resident relocations in May 2025. Although construction was initially scheduled to begin in April or May 2025, NYCHA has postponed the start date to accommodate the revised schedule for Tompkins Houses. With this adjustment, NYCHA aims to prevent additional delays and ensure more efficient resource coordination across both projects.¹⁵⁸

C. Compliance with *Baez* (Requirement No. M2)

Under the HUD Agreement, NYCHA must comply with the terms of court orders entered in *Baez v. NYCHA*, No. 13 Civ. 8915, a federal class action lawsuit brought by NYCHA residents suffering from asthma and living in apartments with mold and excessive moisture.¹⁵⁹ In Year 6, NYCHA remained out of compliance with the court orders in *Baez*.

The Monitors will continue to collaborate with the IMA, IDA, and *Baez* Plaintiffs to address mold and leaks at NYCHA in a coordinated manner.¹⁶⁰

D. Completed and In Compliance Obligations

The HUD Agreement requirement that NYCHA met prior to the period covered by this report (**Requirement No. M1**) is listed in Appendix A.

Overview of Outstanding Mold and Leaks Obligations

The following table summarizes the status of NYCHA's compliance with the outstanding requirements of the HUD Agreement as of the end of Year 6, January 31, 2025, unless otherwise noted. The table categorizes each requirement as an occurrence obligation (yellow), response-time obligation (orange), or policy and practice obligation (green).

Req. No.	Description	Status	Compliance Details
Occurrence Obligations			
M2 (Ex. B ¶ 15(a))	Recurrence of Verified Mold Complaints: By January 31, 2024, for 85% of mold complaints verified by a NYCHA employee, there must not be a second verified mold complaint for the same apartment, common area room, or hallway within a 12-month period.	In compliance: 86%	NYCHA is compliant with this requirement. As of the end of Year 5, for 86% of mold complaints, there was not a second mold complaint within a 12-month period.
M3 (Ex. B ¶ 15(b))	Existence of Large Mold Growths: By January 31, 2024, fewer than 15% of mold complaints verified by a NYCHA employee may be for visible mold covering ten or more square feet.	Not in compliance: 84%	NYCHA is not compliant with this requirement. In Year 6, 84% of verified mold complaints concerned mold covering ten or more square feet.

Req. No.	Description	Status	Compliance Details
M4 (Ex. B. ¶ 15(c))	Recurrence of Mold: By January 31, 2024, mold must never occur more than three times in a single apartment over a 12-month period.	Not in compliance: 51 apartments	NYCHA is not compliant with this requirement. As of the end of Year 5, mold appeared more than three times per year in 51 apartments.
Response-Time Obligations			
M5 (Ex. B. ¶ 17(a))	Work Plan Distribution: By January 31, 2021, for 95% of resident-made or NYCHA-identified verified mold complaints, NYCHA shall prepare and provide a work plan addressing the root cause(s) of the mold to the resident within five business days.	Not in compliance: 64%	NYCHA is not compliant with this requirement. In Year 6, NYCHA printed a work plan within five business days 64% of the time.
M6 (Ex. B. ¶ 17(b))	Mold Removal and Remediation: By January 31, 2021, for 95% of resident-made or NYCHA-identified verified mold complaints, NYCHA shall (1) remove visible mold within five business days; (2) remediate the mold and its underlying root cause(s) within seven days for simple repairs; or (3) remediate the	Not in compliance: 9%	NYCHA is not compliant with this requirement. In Year 6, NYCHA addressed verified mold complaints within the timeframes specified by the HUD Agreement 9% of the time.

Req. No.	Description	Status	Compliance Details
	mold and its underlying root cause(s) within 15 days for complex repairs.		
M7 (Ex. B. ¶ 17(c))	<p>Leak Abatement: By January 31, 2021, NYCHA shall (1) abate all reports of floods, leaks from above, and other conditions that cause sustained or recurrent moisture to flow into a resident's apartment or apartment walls within 24 hours of a resident's complaint and (2) remove any standing water within 48 hours of a resident's complaint 95% of the time.</p>	<p>(1) Not in compliance: 70%</p> <p>(2) Not currently measured</p>	<p>(1) NYCHA is not compliant with this requirement. In Year 6, NYCHA abated all reported floods, leaks from above, and other conditions that cause sustained or recurrent moisture to flow into a resident's apartment or apartment walls within 24 hours 70% of the time.</p> <p>(2) Because NYCHA has not developed a Leak SP, it does not currently measure whether it removes standing water within 48 hours.</p>
Policy and Practice Obligations			
M8 (Ex. B. ¶ 20)	<p>Compliance with Baez: NYCHA must comply with terms of the orders in <i>Baez v. NYCHA</i> as they may be entered or revised by the Court.</p>	Not in compliance	NYCHA reports, and the IDA and IMA confirm, that as of January 31, 2025, NYCHA does not meet the terms of the court orders in <i>Baez</i> .

I.5 Lead

The HUD Agreement requires NYCHA to comply with federal, state, and city lead regulations, including compliance with lead safe work practices and timely completion of interim controls to limit the risks posed by existing lead-based paint.¹⁶¹ The Agreement ultimately requires NYCHA to abate all lead-based paint in its developments by 2039.¹⁶² This subsection provides an update on NYCHA's progress on its outstanding lead-related obligations under the Agreement for the period from February 1, 2024, to January 31, 2025 ("Year 6").

Over the course of Year 6, NYCHA made significant progress towards fulfilling its lead-related obligations. For example, NYCHA reached the milestone of abating over 12,000 total apartments upon the close of Year 6¹⁶³—approximately 27% of the current known universe of apartments containing lead-based paint. NYCHA also reached the milestone of conducting **X-Ray Fluorescence ("XRF") testing** in over 100,000 apartments.¹⁶⁴

Still, NYCHA has work to do toward addressing other lead-related obligations, beginning with particularly high-risk facilities operated within NYCHA properties—childcare centers. A focus on childcare centers is imperative because, between October 2024 and the end of January 2025, NYCHA received four separate reports of an **elevated blood lead level ("EBLL")** in its childcare centers, a significant increase from historical trends. In connection with this increase, in Year 7, NYCHA stated that it will develop a plan to comprehensively test childcare centers on its properties to identify those needing abatement, but testing will not begin until late 2025, at the earliest. In the meantime, NYCHA will conduct visual assessments and perform interim measures to address potential lead-based paint hazards in childcare centers. The Monitors and their consulting lead expert will support NYCHA to ensure compliance with all visual assessment and interim control requirements and urge NYCHA to accelerate testing and abatement efforts for the highest risk centers, including any centers NYCHA has identified as high risk through visual assessments. The Monitors will report NYCHA's progress toward this effort, and its other outstanding lead obligations, in future reports. Obligations that NYCHA has completed may be found in Appendix A.

X-Ray Fluorescence ("XRF") Testing:

XRF testing is a non-destructive analytical technique that uses X-rays to determine the elemental composition of a material, including to determine whether lead is present.

Elevated Blood Lead Level ("EBLL"):

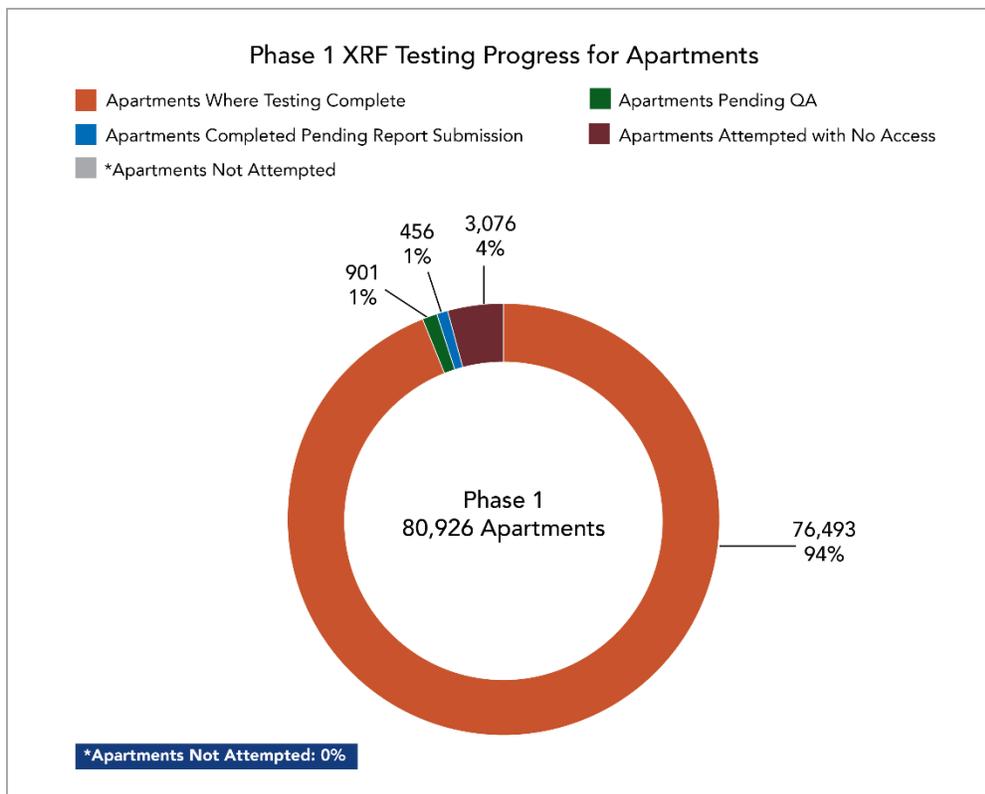
EBLL is a confirmed concentration of lead in the blood of a child under age six equal to or greater than 3.5 micrograms per deciliter or higher.

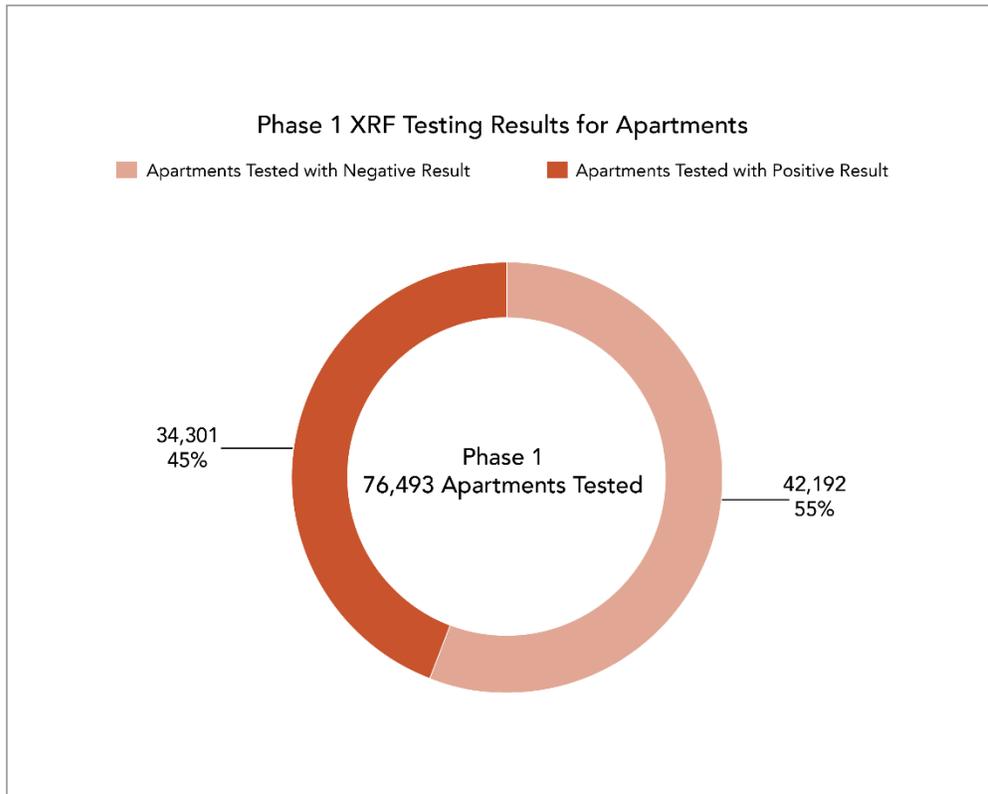
A. Testing and Abatement Progress in Apartments (Requirement Nos. L6, L20-L22)

The HUD Agreement requires NYCHA to abate 50% of apartments by 2029, 75% of apartments by 2034, and 100% of apartments by 2039.¹⁶⁵ To identify the complete universe of apartments containing lead-based paint and requiring abatement, NYCHA is undertaking a robust campaign to conduct XRF testing in all apartments not previously tested at the current NYC definition of lead paint (0.5 mg/cm²).¹⁶⁶ As described further below, NYCHA made significant progress toward identifying and abating the remaining universe of apartments with lead-based paint in Year 6.

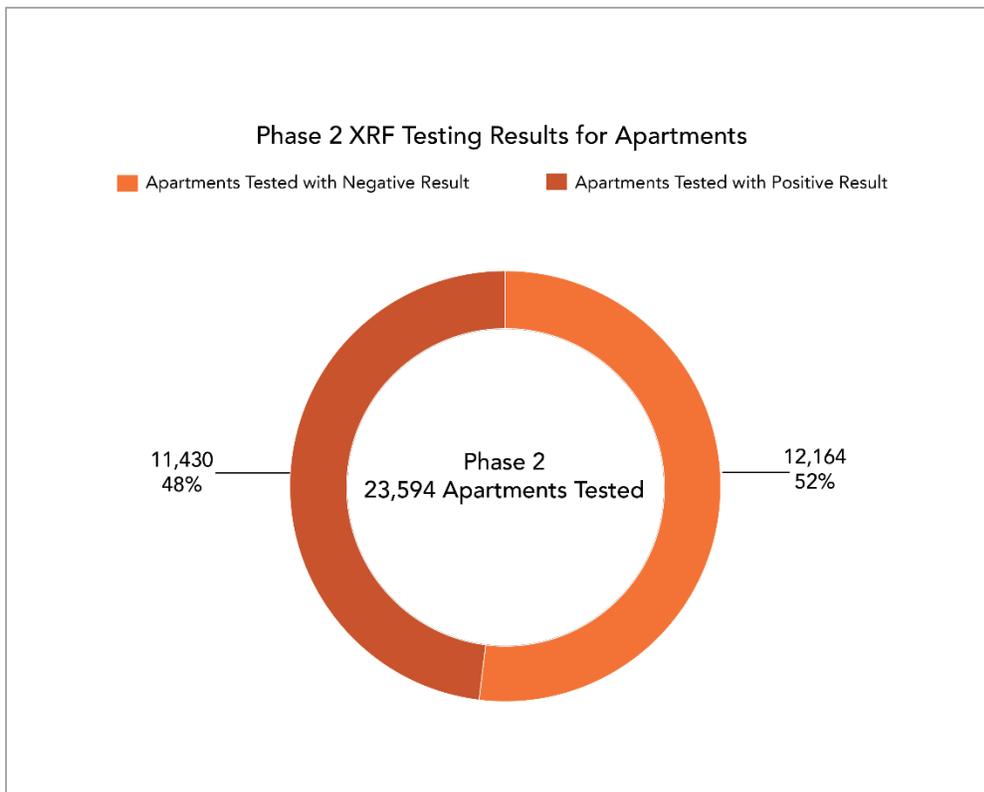
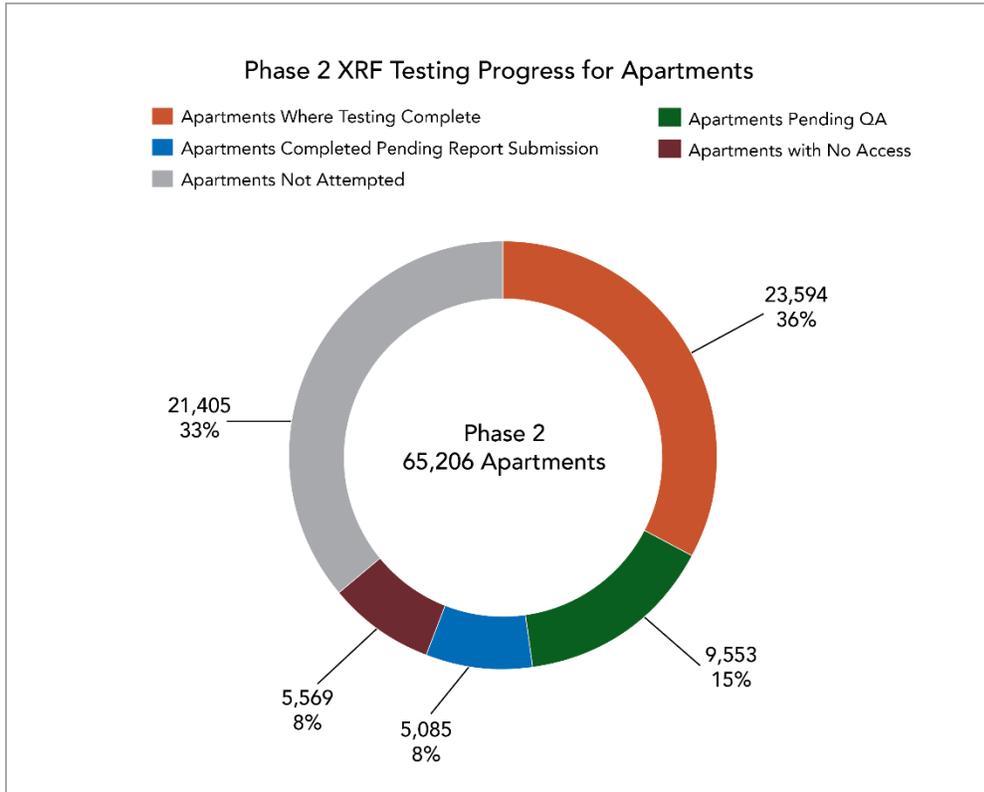
1. XRF Testing in Apartments

According to NYCHA's data and as shown in the graphs below, upon the close of Year 6, NYCHA completed or attempted to complete XRF testing in 100% of Phase One of its testing initiative, which consisted of prioritized apartments including those where children under age six live and spend time ("CU6 Apartments").¹⁶⁷ Phase One testing yielded a 45% positivity rate.





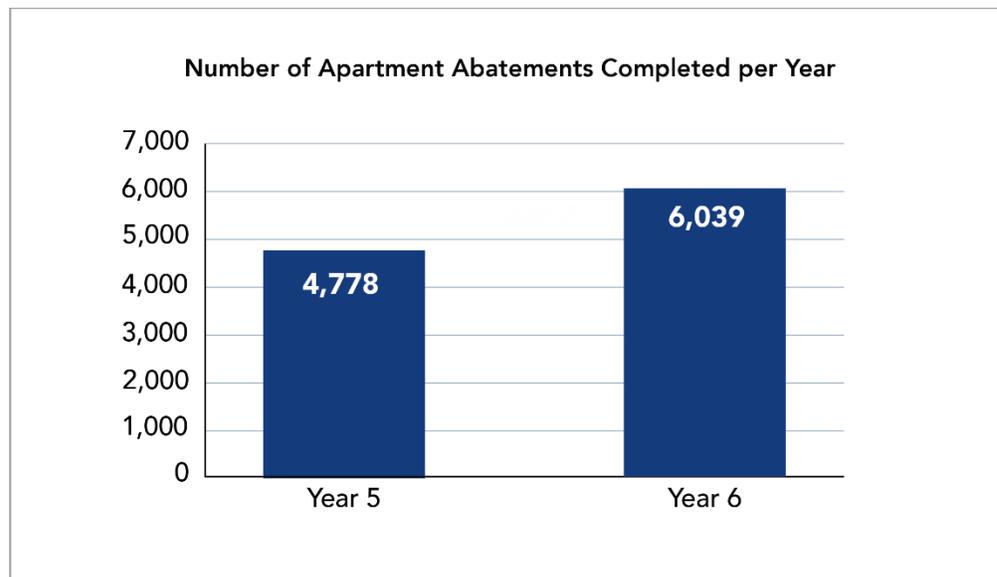
As shown in the data below, by the close of Year 6, NYCHA had tested or attempted to test 67% of Phase Two apartments. About one half (48%) of tested Phase Two apartments have tested positive for lead-based paint.



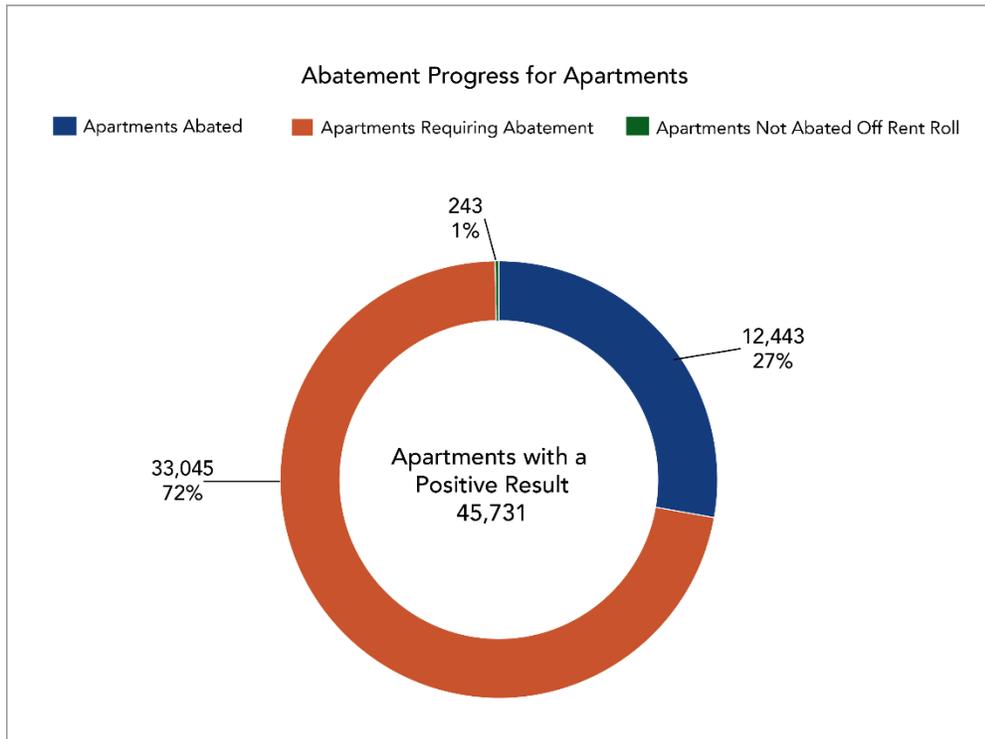
NYCHA reports that it expects to complete substantially all XRF testing by the end of the third quarter of 2025 and plans to spend the fourth quarter of 2025 returning to any apartments that it could not access.¹⁶⁸

2. Abatement in Apartments

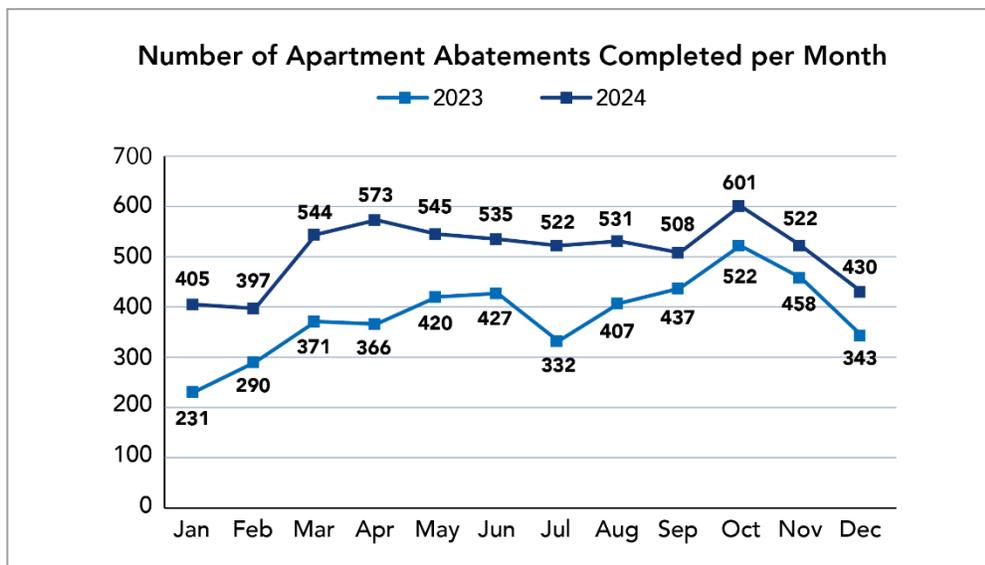
NYCHA continues to make meaningful progress towards abating apartments that have tested positive for lead-based paint. As shown by the graph below, NYCHA abated a total of 6,039 apartments in Year 6, an increase from 4,778 apartments abated in Year 5.



As illustrated in the graph below, as of the close of Year 6, NYCHA had abated 12,443 apartments, totaling approximately 27%¹⁶⁹ of the known universe of apartments with lead-based paint.¹⁷⁰



Finally, as shown in the data below, NYCHA increased its monthly rate of abatement in 2024 as compared to 2023 by a meaningful margin.



As demonstrated by the data, NYCHA's monthly abatement totals varied somewhat substantially month over month in both 2023 and 2024, as expected. NYCHA reports that these variations are

attributable to seasonal factors including holidays, availability of hotel rooms for relocation, staffing, and other resources.¹⁷¹

Based on abatement totals to date and NYCHA's current rate of abatement, NYCHA appears to be on track to meet the HUD Agreement obligation to abate 50% of apartments needing abatement by the end of 2029.¹⁷² Specifically, the Monitors expect NYCHA will have attempted testing in approximately 147,000 apartments for lead by the end of 2025 and, based on current positivity rates, expects NYCHA will be required to abate approximately 70,000 apartments. The Agreement requires NYCHA to abate 50% of lead-positive apartments (approximately 35,000 apartments based on current positivity rates) by 2029. NYCHA is on track to abate over 40,000 apartments by the end of 2029 if it maintains its current rate of abatement.

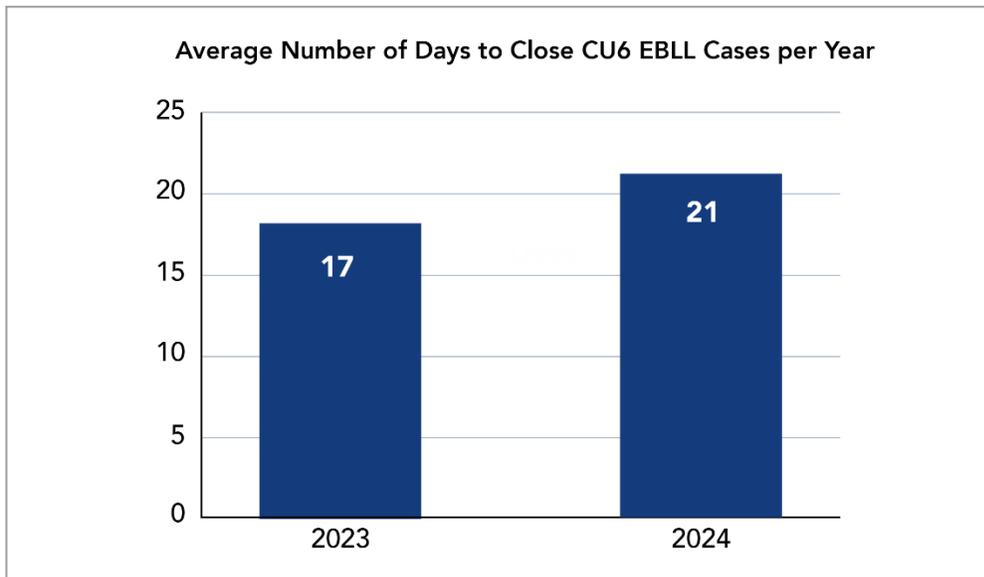
B. Complying with Elevated Blood Lead Level Obligations (Requirement Nos. L23-L25)

Under the HUD Agreement, NYCHA is required to comply with various federal and local regulations when it becomes aware of a child under age six with an EBLL in its developments.¹⁷³ The following subsections discuss NYCHA's Year 6 compliance with various EBLL obligations outlined in the Agreement, as well as NYCHA's plan to develop a testing plan for childcare centers in Year 7, in light of the recent EBLLs reported in childcare centers operated in NYCHA properties.

1. EBLL Obligations

Under the HUD Agreement, NYCHA follows a regulatory reporting and response protocol after becoming aware that a child under age six in one of its properties has an EBLL.¹⁷⁴ Specifically, NYCHA must report to HUD within five days of being notified of an EBLL by the NYC Department of Health and Mental Hygiene ("DOHMH"), and to the Monitors and the U.S. government within five days of receiving any Commissioner order to abate ("COTA") in connection with an EBLL.¹⁷⁵ NYCHA was in compliance in Year 6 with these obligations and maintains an automated process in Maximo for notifying all necessary parties of any EBLLs it receives, as well as any subsequent remedial steps taken in connection with each order to abate.

After receiving an order to abate, NYCHA must conduct an environmental investigation,¹⁷⁶ if DOHMH has not already conducted one, to determine whether lead-based paint hazards exist in the child's home or building and, pursuant to the HUD Agreement and relevant regulations, NYCHA must complete any necessary abatements within 30 days of receiving notice of a confirmed EBLL for a child under six.¹⁷⁷ As demonstrated in the graph below, NYCHA completed any such abatements within an average of 21 days across 2024, as compared to an average of 17 days across 2023. On average, NYCHA completed the abatement process within the 30-day timeframe stipulated by the Agreement and applicable regulations.



The Monitors will continue to report on NYCHA's progress toward compliance with EBLL requirements in the HUD Agreement and federal regulations.

2. Abatement of Childcare Centers in Connection with EBLLS

In the last three months, NYCHA received reports of four EBLLs originating from its childcare centers, causing NYCHA to prioritize these centers as the next phase of its comprehensive XRF testing initiative. Specifically, between October 2024 and the end of January 2025, NYCHA received EBLL reports originating from the Justice Sonia Sotomayor House center, the Brevoort center, and two reports originating from the Queensbridge South center. For

context, only three EBLLs total were reported in NYCHA childcare centers in 2022 and 2023—two in a Manhattanville childcare center and one in a Bland Houses childcare center.

The rise in cases may be attributable, at least in part, to a recent definitional change to “EBLL.” Specifically, in March 2022, the Center for Disease Control and Prevention lowered the blood lead level threshold for mandatory intervention from 5 mcg/dL to 3.5 mcg/dL or higher, and in October 2022, the NYC Board of Health changed its regulations to require intervention at the lower threshold.¹⁷⁸ According to the Monitors’ consulting lead expert, housing developments across the country have seen an increase in EBLL cases following the change in definition. However, NYCHA does not have access to the precise blood lead level results for each EBLL report it receives from DOHMH as this is protected health information, so it is unable to determine with certainty that the increase in EBLLs is attributable only to the change in the standard of what constitutes an actionable elevated blood lead level.

Upon receiving notice of each of the EBLLs in its childcare centers, NYCHA has acted promptly and holistically to assess the situation and conduct any necessary remediation. For example, NYCHA followed the below process after an EBLL was reported at the childcare center in Brevoort Houses:

- On October 18, 2024, NYCHA received an abatement order from DOHMH relating to an EBLL case identified in the Brevoort childcare center.¹⁷⁹
- On that same day, NYCHA mailed a letter to the parents of children who attended the childcare center notifying them of the EBLL incident and abatement order.¹⁸⁰ The letter stated that Classroom 2 (identified in the DOHMH COTA) would be closed pending abatement. The notice to parents suggested that parents contact the NYC Department of Education’s Outreach Team for additional care options.
- Between October 19 and 23, NYCHA conducted XRF and paint chip testing of the entire center to identify all lead positive building components.¹⁸¹

- On October 28, NYCHA issued a Resident Notice of Lead Based Paint Evaluation regarding the October 19 evaluation.¹⁸² The notice outlined each component that was tested and whether the result was positive or negative.
- On November 4, NYCHA updated parents that its testing had identified positive components in addition to those identified by DOHMH and informed parents that the entire center would be closed and abated between November 9 and November 27, with an expected reopening on December 2.¹⁸³ The notice to parents suggested that parents contact the NYC Department of Education's Outreach Team for alternative care options.
- On November 13, NYCHA issued a Notification of Commencement of Lead Abatement/Remediation for abatement starting on November 18 and expected to be completed on December 11.¹⁸⁴
- Between November 18 and November 27, NYCHA conducted lead abatement of the center, and on November 29, DOHMH issued a clearance letter stating that the abatement was successful.¹⁸⁵
- On December 2, NYCHA issued the Compliance Letter to the Daycare Center Provider stating that the abatement was complete and passed clearance tests. On December 2, the provider received clearance to reopen the center.¹⁸⁶

NYCHA followed a similar protocol when abating the Queensbridge South and Sotomayor Houses childcare centers. Specifically, NYCHA issued the Compliance Letter to the childcare center at Queensbridge South after abatement on December 18, 2024, 47 days after receiving the first COTA from DOHMH. Additionally, NYCHA issued the Compliance Letter to the childcare center at Sotomayor Houses after abatement on February 11, 2025, 35 days after receiving the EBLL notice. NYCHA's swift abatement of the childcare center at Sotomayor Houses is particularly impressive, given the DOHMH COTA and NYCHA XRF testing identified twenty-eight lead-positive components in that center.

As of the close of Year 6, NYCHA had only implemented a plan for comprehensive testing and abatement of apartments, which pose significant risks to residents due to the amount of time residents spend in their apartments.¹⁸⁷ However, in response to the recent increase of EBLLs reported in its childcare centers and the risks posed by lead-based paint to young children, in Year 7, NYCHA stated it will develop a plan to test childcare centers. NYCHA's plan will account for logistical considerations such as coordination with the Department of Education regarding alternate childcare options for parents while the centers are closed, among other considerations. Subject to resource availability, NYCHA does not expect to begin implementing comprehensive XRF testing in centers until no earlier than the end of 2025, upon completing XRF testing in apartments, with abatement of centers to follow thereafter.

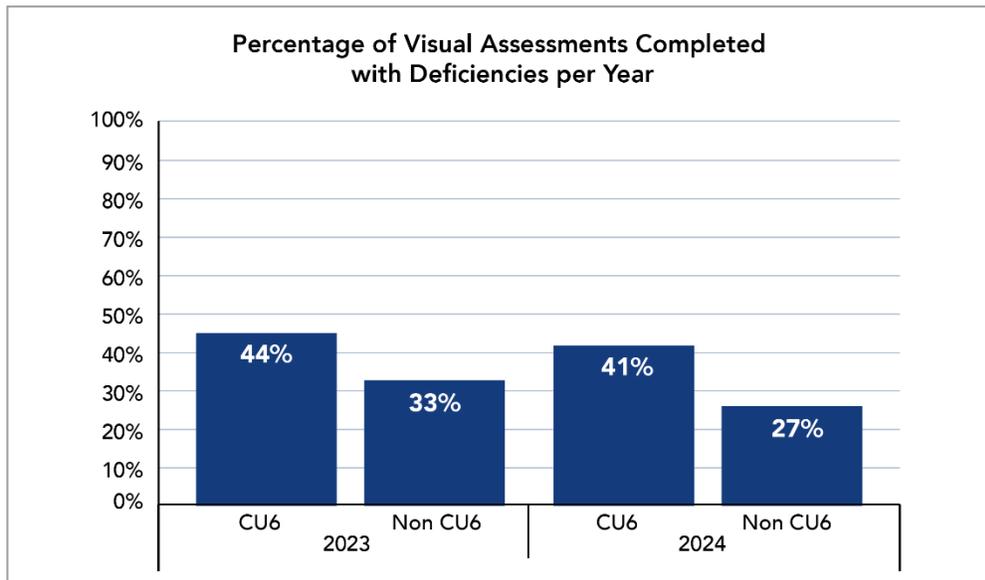
The Monitors are focused on ensuring NYCHA quickly develops an effective and efficient plan for testing childcare centers, as well as any common areas posing high risks to children, and the Monitors will support NYCHA in those efforts in 2025. On this point, the Monitors and their consulting lead expert urge NYCHA to draft a plan that accelerates testing and subsequent abatement for any centers it deems to be at a high-risk of containing lead-based paint. The Monitors will support NYCHA as its plan is being developed and implemented and while NYCHA continues to ensure and document compliance with visual assessment and interim control requirements in childcare centers throughout Year 7. Finally, the Monitors have asked NYCHA, and NYCHA has agreed, to proactively consider any common areas and exteriors that may pose heightened risks to children, such as playgrounds, as it develops its testing and abatement plans. The Monitors will report on NYCHA's progress toward addressing these risks in future reports and will work with NYCHA to address any resource constraints that could limit its ability to execute on its plan for testing and abatement.

C. Conducting Visual Assessments and Remediating Identified Paint Deficiencies (Requirement Nos. L28-L29)

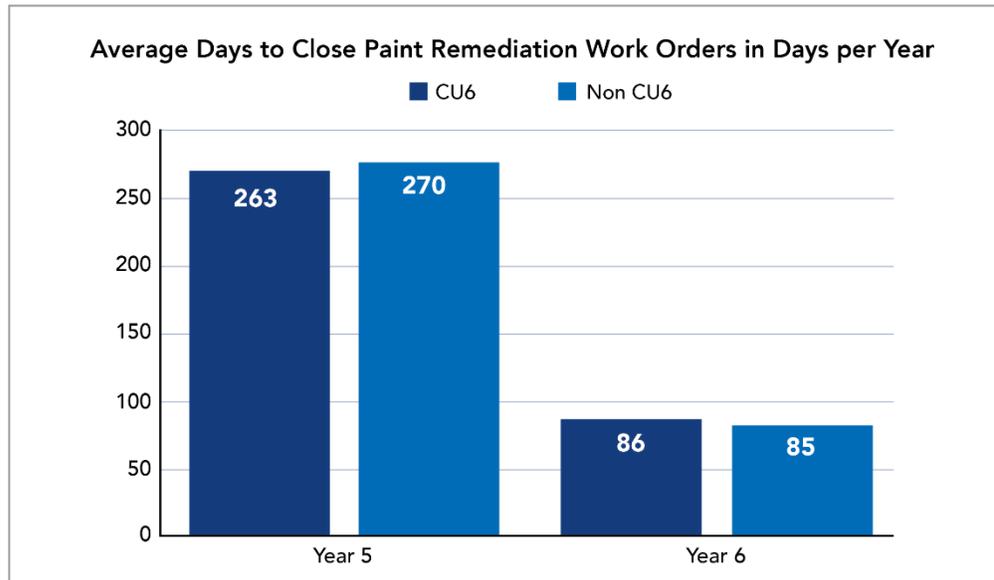
Under the HUD Agreement and relevant federal lead regulations, NYCHA is required to conduct visual assessments of apartments known or presumed to contain lead-based paint and is additionally required to remediate any deficiencies identified during those assessments within certain federally mandated time periods.¹⁸⁸

NYCHA has made good progress towards conducting these visual assessments and reports that it is in compliance with the relevant regulatory requirement to inspect all CU6 Apartments annually.

As shown in the graph below, the percentage of visual assessments resulting in deficiencies needing remediation decreased from 2023 to 2024.



NYCHA is required under relevant regulations and the HUD Agreement to remediate deficiencies identified in CU6 Apartments within 90 days and deficiencies identified in non-CU6 Apartments within 12 months. As the graph below indicates, NYCHA's performance improved in Year 6 as compared to Year 5 with respect to these obligations, as NYCHA significantly reduced the average number of days it takes to close paint remediation work orders. Notably, in Year 6, NYCHA brought the average number of days taken to close both CU6 and non-CU6 work orders within the required timeframes.¹⁸⁹

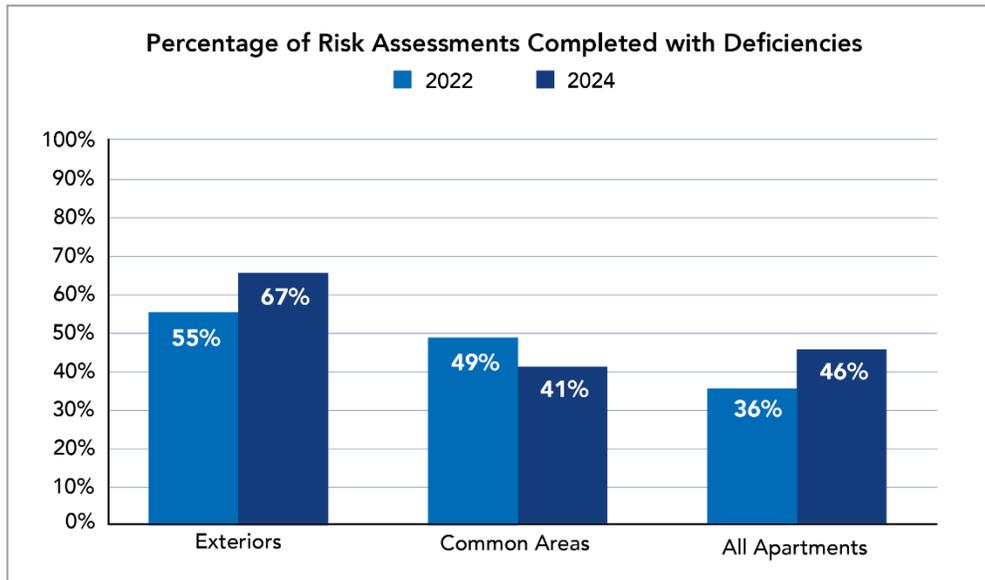


Still, NYCHA maintains a backlog of paint remediation work orders that remain open from the last several years. The Monitors will support NYCHA in Year 7 as it endeavors to clear its backlog of remediation work orders and continues to improve the pace at which it completes paint remediation work orders.

D. Conducting Risk Assessment Reevaluations (Requirement No. L30)

Under the HUD Agreement and pursuant to relevant regulations, NYCHA is required to conduct biennial risk assessment reevaluations for apartments which have tested positive or are presumed positive for lead-based paint.¹⁹⁰ This includes units where the hazards have been mitigated via interim controls but have not yet been abated.¹⁹¹ The reevaluations include performing visual assessments, identifying hazard reduction omissions or failures, performing selected evaluation of paint, soil, and dust, and recommending responses to hazards.¹⁹² NYCHA reports that it is substantially in compliance with this requirement.

According to NYCHA's data and as the graph below indicates, the percentage of risk assessments identifying deficiencies increased for apartments and exteriors from 2022 to 2024, but decreased for common areas.

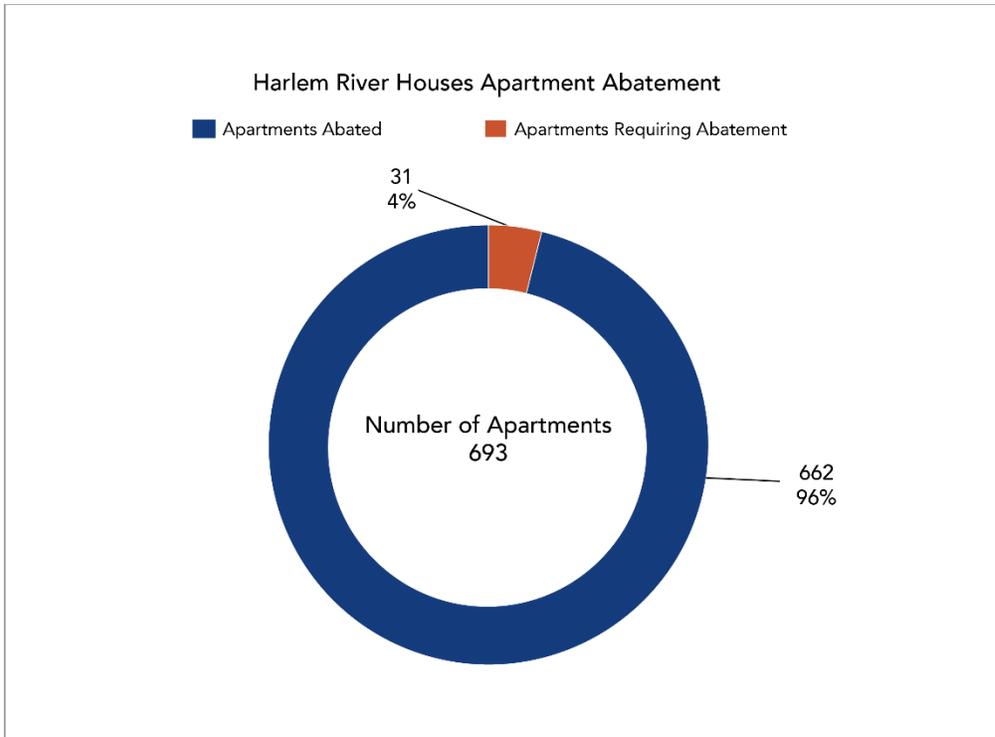
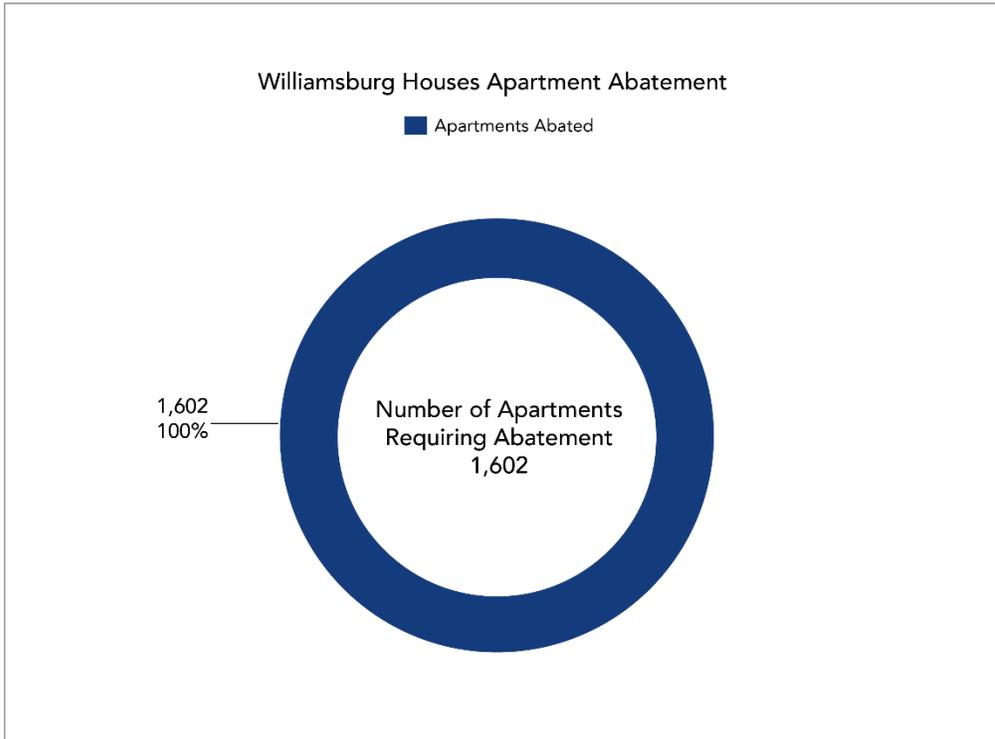


NYCHA reports that increases in deficiencies may be attributable to improved practices for identifying high-risk apartments and common areas to include within the sample for its biennial risk assessment, as well as NYCHA's backlog of paint remediation work orders, discussed in **Section I.5.C** of this report.

E. Ensuring PACT Partner Compliance with Abatement Requirements (Requirements Nos. L6, L20-22, L36) (abatement deadlines); (Requirement No. L.26) (regulatory requirements for conducting abatement)

The HUD Agreement required NYCHA to ensure that two recently converted PACT developments known to have particularly high levels of lead—Harlem River Houses and Williamsburg Houses—have been completely abated by January 31, 2024.¹⁹³

As illustrated in the graphs below, as of the close of Year 6, NYCHA and its PACT partners completed abatement of all Williamsburg Houses apartments requiring abatement, and 96% of the apartments requiring abatement at Harlem River Houses. The near completion of abatement at these developments represents a major milestone for NYCHA, as these developments had some of the highest known levels of lead paint in NYCHA's portfolio.



NYCHA reports it anticipates completing abatement at Harlem River Houses in the second quarter of 2025.

F. Completed, In Compliance, and Superseded Obligations

The HUD Agreement obligations that NYCHA met prior to the period covered by this report, or that were superseded by other obligations (**Requirement Nos. L1-L5, L7-L17, L19**) are listed in Appendix A.

Overview of Outstanding Lead-Based Paint Obligations

The following table summarizes the statuses of NYCHA's compliance with the outstanding requirements of the HUD Agreement as of the end of January 31, 2025, unless otherwise noted. The table categorizes each requirement as a one-time requirement (blue), occurrence obligation (yellow); response-time obligation (orange); or policy and practice requirement (green):

Req. No.	Description	Status	Compliance Details
One-Time Requirement			
Ex. A ¶ 8	Development-Specific Abatement: Abate all lead-based paint at the Harlem River Houses and Williamsburg Houses by January 31, 2024.	Partially complete	These developments were transferred to third-party management through the PACT program. Due to closing delays as well as the change in New York City's lead threshold, not all lead-based paint was abated by the target deadline. NYCHA and its PACT partners have since completed abatement of Williamsburg and estimate that all lead-based paint at Harlem River will be abated in Q2 2025.
Occurrence Obligations			
L20 (Ex. A ¶ 9)	50% Abatement: Abate all lead-based paint in 50% of apartments that contain lead-based paint and interior common areas that contain lead-based paint in the same building as those	Not due	NYCHA reports that it is abating apartments with lead-based paint at a rate of approximately 300-400 apartments per month. If NYCHA maintains its current rate of abatement, the agency may meet the target

	apartments by January 31, 2029.		deadline depending on the total universe of apartments with lead that is determined through XRF testing. NYCHA has not developed a formal plan to abate common areas.
L21 (Ex. A ¶ 10)	75% Abatement: Abate all lead-based paint in 75% of apartments that contain lead-based paint and interior common areas that contain lead-based paint in the same building as those apartments by January 31, 2034.	Not due	NYCHA reports that it is abating apartments with lead-based paint at a rate of approximately 300-400 apartments per month. If NYCHA maintains its current rate of abatement, the agency may meet the target deadline. However, NYCHA has not developed a formal plan to abate common areas.
L22 (Ex. A ¶ 11)	100% Abatement: Abate all lead-based paint in 100% of apartments that contain lead-based paint and interior common areas that contain lead-based paint in the same building as those apartments by January 31, 2039.	Not due	NYCHA reports that it is abating apartments with lead-based paint at a rate of approximately 300-400 apartments per month. If NYCHA maintains its current rate of abatement, the agency may meet the target deadline. However, NYCHA has not developed a formal plan to abate common areas.
L36 (Ex. A ¶ 12)	Exterior Common Areas: Develop an Action Plan that sets forth a timeline for the abatement of	Incomplete	NYCHA has not yet developed a formal plan related to exterior common areas.

	<p>exterior common areas that contain lead-based paint and prioritizes common areas posing a higher risk of exposure to children.</p>		
Response Obligations			
<p>L23 (Ex. A ¶ 23)</p>	<p>EBLL Reporting: Report to HUD each confirmed case of a child with an EBLL within five business days of being notified, in accordance with 24 C.F.R. § 35.1130.</p>	<p>In compliance</p>	
<p>L24 (Ex. A ¶ 25)</p>	<p>EBLL Abatement Orders: Report to the Monitors and to the United States any NYC Department of Health and Mental Hygiene Commissioner order to abate lead-based paint within five days of receiving such order.</p>	<p>In compliance</p>	
<p>L25 (Ex. A ¶ 26)</p>	<p>Environmental Investigations: To the extent the NYC Department of Health and Mental Hygiene Commissioner has not performed an environmental investigation of any apartment in which a child with an EBLL has been reported</p>	<p>Substantial compliance</p>	

	within 15 days of identifying such apartment, NYCHA shall perform an environmental investigation of that apartment and common areas servicing that apartment and perform abatement of any lead-based paint hazards within 30 days.		
Policy and Practice Obligations			
L26 (Ex. A ¶ 14)	Compliance with 40 C.F.R. § 745.227: When performing any abatement, comply with 40 C.F.R. § 745.227.	Partial compliance	NYCHA reports that it has made progress but cannot certify 100% compliance with this obligation because it needs more IT support to eliminate the need to manually develop notices of hazard reduction for all abatements.
L27 (Ex. A ¶ 15)	Lead-Safe Work Practices: Comply with lead-safe work-practice requirements when directing or performing renovation or maintenance work in lead-paint developments. These requirements are set forth in the Lead-Safe Housing Rule, 24 C.F.R. part 35, subparts B-R, and the Renovation, Repair, and Painting	Partial compliance	As discussed in Subsection II.6.B of the December 2024 Monitors' Report, NYCHA does not currently comply with the relocation requirement set forth in these rules, although NYCHA is developing a path towards compliance consistent with the guidance provided by HUD in November 2024.

	Rule, 40 C.F.R. part 745, subpart E.		
L28 (Ex. A ¶ 16)	Visual Assessments: Perform visual assessments in developments that contain lead-based paint in compliance with federal regulations.	In compliance	
L29 (Ex. A ¶ 17)	Lead-Based Paint Deficiencies Identified During Visual Assessments: Control deteriorated lead-based paint identified by visual assessments in compliance with federal regulations.	Not in compliance	NYCHA currently corrects deficiencies identified during visual assessments within the timeframes specified by federal regulations on average. NYCHA also has a backlog of uncorrected lead-based paint deficiencies identified during visual assessments.
L30 (Ex. A ¶ 18)	Risk-Assessment Reevaluations: Conduct risk-assessment reevaluations of all NYCHA housing that contains lead-based paint in accordance with 24 C.F.R. § 35.1355, which governs ongoing lead-based paint maintenance and reevaluation activities.	In compliance	
L31 (Ex. A ¶ 27)	Lead Disclosures to New Residents: Provide residents signing new leases (or, where required	Partial compliance	NYCHA reports that, according to EH&S's random sampling reviews of "Tenant Folders" containing

	by regulations, renewal leases) with information about the presence of lead-based paint and lead-based paint hazards in their apartments and developments.		materials documenting resident disclosures, NYCHA was in compliance with this requirement 63.93% of the time, a decrease from 82.98% over the last reporting period. The decrease is attributable to smaller developments with lower compliance rates accounting for a higher proportion of this period's sample as compared to last. The Monitors will work to independently validate data related to this obligation.
L32 (Ex. A ¶ 28)	Physical Copies of Disclosures: Ensure that physical copies of all disclosure materials are present, available for inspection, and permanently maintained at the management office for each development.	Partial compliance	NYCHA reports that, according to EH&S's random sampling reviews of development binders containing relevant risk assessment results and disclosures, NYCHA was in compliance with this requirement 64.73 % of the time, a decrease from 85.23% over the last reporting period. The decrease is attributable to smaller developments with lower compliance rates accounting for a higher proportion of this period's sample as compared to last. The Monitors will work to independently validate data related to this obligation.

L33 (Ex. A ¶ 29)	<p>Electronic Copies of Disclosures: Ensure that electronic copies of all disclosure materials are available to residents through an internet-based portal.</p>	Partial compliance	The First Monitor reported that inspectors found NYCHA was compliant with these requirements in 95% of buildings. Electronic copies of disclosure materials to residents on the online resident portal, though NYCHA is currently reviewing the materials to make sure they are accurate.
L34 (Ex. A ¶ 30(b))	<p>Biannual Certification: Provide the United States and the Monitors a certification describing compliance with abatement and lead-safe work practices obligations by July 2024 and every six months thereafter.</p>	In compliance	
L35 (Ex. A ¶ 33(e))	<p>Ongoing Training: Provide all resident building superintendents, assistant resident building superintendents, and property managers with training in RRP practices on an ongoing basis.</p>	In compliance	

I.6 Inspections

The HUD Agreement requires NYCHA to (1) comply with HUD's physical condition standards, (2) annually self-inspect its apartment units, (3) complete timely, industry standard repairs, and (4) prevent deceptive practices with respect to HUD's inspections. The subsection below is an update on NYCHA's progress with respect to outstanding inspection-related obligations in **2024**.

The year 2024 was the first full year in which NYCHA was evaluated by HUD pursuant to its new physical condition standards. Of the 138 NYCHA developments evaluated by HUD inspectors, the majority (54%) failed the inspections. Moreover, NYCHA reported that HUD will closely monitor three developments that received low scores due to a high prevalence of health and safety issues observed during inspections. However, NYCHA still achieved important progress in 2024, with more than a third of NYCHA developments moving from failing to passing scores compared to the prior year, and this result could improve depending on the results of several appeals.¹⁹⁴ For comparison, in 2023, fewer than 15% of inspected developments passed, and 50 developments were subject to closer monitoring by HUD.¹⁹⁵ Two of the developments that will be closely monitored by HUD this year failed HUD's inspections at least in part because of a lack of minor repairs that could have been completed by NYCHA workers during its annual self-inspections process, making improving that process a particularly important and achievable task for NYCHA this year.

With regard to NYCHA's self-inspections, in 2024, NYCHA was for the first time required to complete inspections in 100% of occupied units (compared to 50% of units per year previously), and NYCHA completed inspections in 91% of occupied units. NYCHA did not achieve a 100% self-inspection rate because NYCHA did not attempt inspections in 5% of occupied units and because, for 4% of occupied units, NYCHA was unable to gain entry after repeated inspection attempts. Further, because NYCHA performs minor repairs of deficiencies identified during inspections, the increase in inspections also resulted in a significant increase in repair work. However, the documentation and completion of these repairs remains inconsistent across developments and staff. Improving the completion and documentation of these minor repairs should be a priority in 2025. The Monitors will continue to track NYCHA's efforts

Inspections Calendar Year (2024): Section 1.6 of the Monitors' March 2025 Report details NYCHA's efforts to comply with its inspection-related obligations for the period covering January 1, 2024, through December 31, 2024.

to improve its compliance, including efforts to provide adequate notice and information to residents about the inspections process, deploy available resources to complete annual inspections, and improve repair documentation resulting from inspections. Obligations that NYCHA has completed to date may be found in Appendix A.

A. HUD’s Guidance and Standards (Requirement Nos. 15 and 17)

Under HUD regulations (as incorporated into the HUD Agreement), NYCHA is required to make all repairs in accordance with HUD’s physical condition standards, **NSPIRE**, and provide housing that is functionally adequate, operable, and free of health and safety defects standards at all times.¹⁹⁶ HUD regularly conducts inspections of NYCHA’s developments to determine NYCHA’s compliance with these requirements. The subsection below provides an update on NYCHA’s compliance with this obligation, including the performance of NYCHA’s developments during HUD’s inspections and the results identified as a result of them.

1. NSPIRE Results

For the 2024 cycle of HUD inspections, NYCHA received results for 138 inspected developments. Of these inspections, 75 (54%) of NYCHA developments failed HUD’s evaluation and 63 (46%) passed. NYCHA further reported that it plans to or has appealed results for 9% of inspected developments.¹⁹⁷ Passing or failing is determined by an overall weighted score, calculated based on the deficiencies—categorized as life-threatening, severe, moderate, or low concern—identified during the inspection.¹⁹⁸ To pass, a development must receive an overall score of 60 or greater and have fewer than 30 points deducted for¹⁹⁹ in-unit deficiencies, such as unprotected electrical outlets or missing bathtub drainage stoppages. If 30 or more points are deducted for such deficiencies, but the development otherwise scores a passing grade of 60 or above, that score will be adjusted down to 59 and the development will receive a failing grade.

A significant portion of NYCHA properties failed because of such in-unit deficiencies, with 31 of 75 failing developments receiving a score of 59 after losing more than 30 points to in-unit deficiencies.

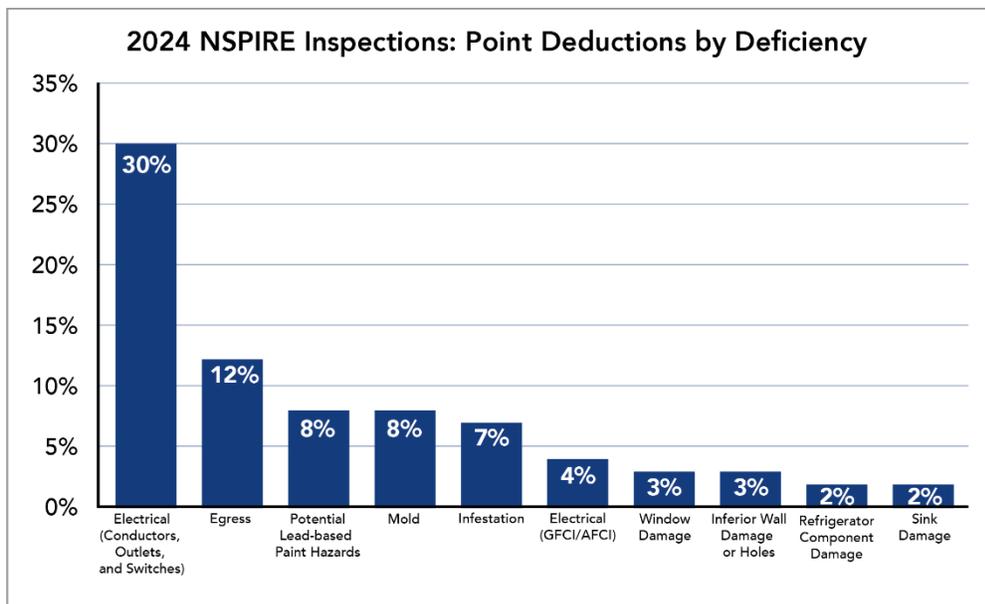
National Standards for the Inspection of Real Estate (“NSPIRE”):

In June 2023, HUD finalized new standards to improve the inspection process for properties and units assisted or insured by HUD. HUD replaced the Uniform Physical Conditions Standards (“UPCS”) with NSPIRE, after observing that UPCS contained a disproportionate emphasis on repairing otherwise safe and functional items, while inadequate attention was paid to remediating health and safety conditions. NSPIRE places renewed attention to identifying and correcting health and safety defects such as carbon monoxide, fire safety, habitability, infestation, lead-based paint, mold, structural integrity, and water safety concerns.

As a result of these findings, NYCHA must take action to correct the deficiencies of the 75 developments that failed the inspection, including the 31 developments that would have passed but for failing to meet HUD's in-unit standards. As further described below, the deficiencies identified by HUD included both minor issues, which can be fixed by Maintenance Workers, and complex repairs requiring skilled trades, such as mold removal and extermination. Many of the more complex repairs may take considerable time to resolve due to NYCHA's backlog of skilled-trade work orders, as described in **Section II.C** of this report.

2. Commonly Identified Deficiencies During HUD Inspections

In 2024, NYCHA reported that HUD's inspectors most routinely identified the deficiencies illustrated in the graph below:



As shown above, close to 30% of the points lost during NSPIRE inspections in 2024 resulted from electrical deficiencies in apartment units such as damaged or missing electrical conductors, outlet covers, and switch/receptables. These deficiencies primarily fall under the "life-threatening" and "severe" deficiency categories, significantly impacting overall property inspection scores.²⁰⁰ But despite their significance, many of these electrical deficiencies are simple to repair and therefore represent a key opportunity for improvement going forward. In fact, many of these deficiencies are

included on NYCHA's list of minor repairs that NYCHA should address during every annual self-inspection, including replacing outlet covers and light switches.

The second most common set of deficiencies was egress violations. These violations typically involve resident-installed-locks or deadbolts on doors that could prevent tenants from exiting quickly in case of fire or other emergencies. NYCHA did not require its own inspectors to check for all egress deficiencies during the annual inspection process. To rectify this issue, NYCHA has committed to inspecting for these deficiencies as part of its annual inspections process after implementing the necessary IT upgrades by the third quarter of 2025. Following the recommendation of the Monitors to take additional measures before the IT upgrade, NYCHA also plans to launch a resident engagement initiative to educate residents about preventable safety risks, starting in the second quarter of 2025.

3. Lowest Performing Properties

An analysis of the three lowest performing properties highlights the importance of performing minor repairs. In 2024, three developments, Whitman Houses in Brooklyn and Rangel Houses and Rutgers Houses in Manhattan, scored below the threshold that HUD considers to be reflective of significant health and safety concerns, which makes these developments subject to further investigation and monitoring by HUD. Each of these developments received reductions for identified mold-like substances, peeling paint, and observed roach infestations. All were also cited for minor deficiencies, such as replacing sink stoppers and electrical outlets, that should be repaired in the ordinary course of NYCHA's annual self-inspections. Notably, if Maintenance Workers had completed the minor repairs on NYCHA's checklist during the annual inspection at Whitman Houses and Rangel Houses—the two lowest scoring properties of the 2024 cycle—those developments would have passed their NSPIRE inspections. According to NYCHA, Rangel and Whitman Houses experienced staffing shortages, which have since been resolved, that limited the annual inspections completed at these developments. At Whitman Houses, where development staff completed only 80% of the required annual inspections, the Neighborhood Administrator, Assistant Superintendent, and Property Manager acknowledged that most of the point losses were deficiencies that could have been

corrected as minor repairs during an annual inspection and intend to complete inspections earlier in 2025.

B. Annual Inspections Action Plan (Requirement No. II)

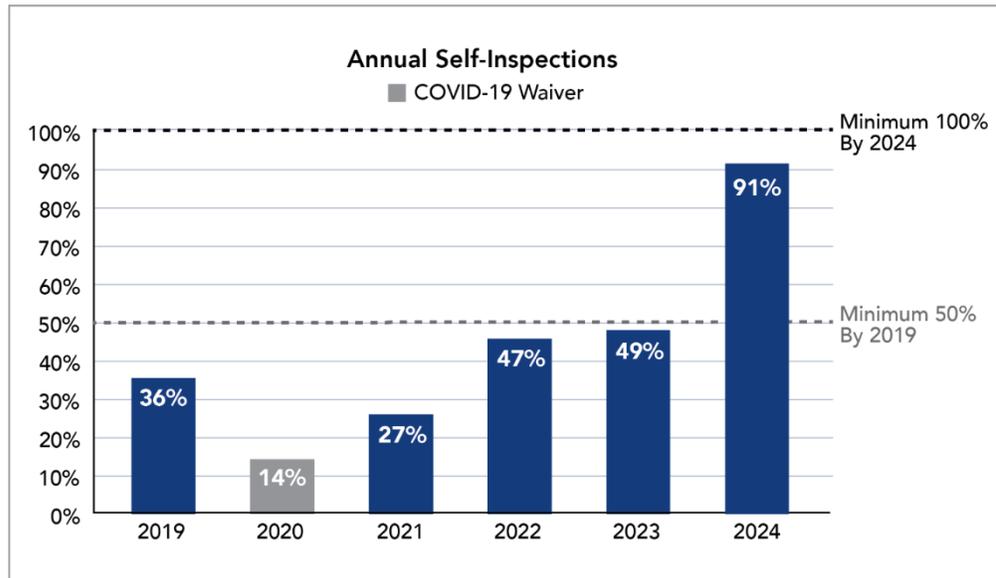
Under the HUD Agreement, NYCHA is required to create an Annual Inspections Action Plan that outlines procedures to conduct annual inspections and schedule repairs that are discovered as a result of them.²⁰¹ After receiving a waiver to complete annual inspections during the COVID-19 pandemic, NYCHA divided this requirement into two phases, and completed the initial phase in 2020.²⁰² In the first quarter of 2025, NYCHA submitted a plan for the second phase to the Monitors, which the Monitors are assessing for actionable steps to improve NYCHA's annual inspection procedures; deploy third-party assistance to complete additional inspections procedures.

C. Annual Self-Inspections (Requirement No. I3)

Under HUD regulations (as incorporated into the HUD Agreement), NYCHA is required to inspect 100% of its apartments annually.²⁰³ The subsections below provide an update on (1) NYCHA's efforts to complete inspections, and (2) the results of NYCHA's inspections.

1. Inspections Completed

In 2024, NYCHA completed inspections in 91% of occupied units for the year, as depicted in the chart below:



Because NYCHA was previously required to inspect 50% of apartments per year, completing 91% of inspections marks a significant increase in NYCHA’s inspection rate and demonstrates the effort that NYCHA has expended to deploy available resources. Still, NYCHA did not fully meet its obligation to inspect 100% of apartments. To close this gap, NYCHA should, at minimum, attempt an inspection in every unit and ensure residents receive the proper notifications about the inspection process. The following subsections describe NYCHA’s 2024 efforts to attempt inspections, as well as the steps that NYCHA will take in 2025 to improve its overall compliance with the annual inspections requirement.

a. Inspection Attempts

Since attempting an inspection is a prerequisite to completing one, NYCHA must make its best efforts to attempt to inspect every apartment. To do so, NYCHA’s standard procedure requires Neighborhood Administrators to monitor the pace of apartment inspections across their portfolio to complete apartment inspections at an acceptable rate. NYCHA’s standard procedure also requires Property Maintenance Supervisors to check daily if units scheduled for maintenance work have a past due apartment inspection scheduled.

Despite having this oversight system in place, by year-end, NYCHA had not attempted inspections in 5% (7,000+) of its

apartments. While the reasons for not attempting inspections varied by development, NYCHA explained that many developments did not attempt inspections because of staffing issues and other maintenance related emergencies.²⁰⁴

To address this gap in 2025, many of NYCHA's developments with the lowest inspection rates have committed to completing more annual inspections earlier in the year. NYCHA has further committed to deploying a third-party vendor where additional resources are most needed. Although NYCHA used a vendor in 2024, NYCHA anticipates expanding the vendor's work in 2025.

b. Resident Communication

NYCHA is supposed to provide a robocall to residents one day prior to their inspections. However, in Year 6, at least 70% of residents did not receive the robocall between the months of January 2024 and September 2024 due to NYCHA implementing of a new call management system that did not operate as intended. At the same time that NYCHA worked to correct this issue, NYCHA made additional outreach to residents throughout the year, including a January 2024 email from NYCHA's Chief Operations Officer, and hand delivered inspection notices 21 days and 7 days prior to the scheduled apartment inspection. Despite these efforts, NYCHA was unable to gain access to approximately 4% (5000+) of the apartments it scheduled for inspection, even after having made a second attempt to access them.

NYCHA's standard procedure requires development staff to conduct additional outreach in 2025 to the 5000+ residents whose apartments were not inspected because they were either not home or refused NYCHA entry into their apartments in 2024. For these 5000+ residents, NYCHA directs Property Managers to send two notices that denying access for an annual inspection violates the terms of their lease. If the inspection still cannot be conducted or if the tenant does not respond to either notice, the Property Manager submits a lease termination request and refers the case to the Office of the Tenant Advocate ("OTA"), who makes additional contact with the resident to resolve the issue before a lease termination hearing will be scheduled. Currently, NYCHA has no agency-wide means for tracking these communications with residents or the outcomes from this process. By the second quarter of 2025, NYCHA has committed

to implementing a tracking system for this outreach to residents, whose assistance NYCHA will need to reach full compliance with its obligation to conduct annual inspections and the accompanying routine maintenance in their apartments.

2. Commonly Identified Deficiencies During Annual Inspections

The results of inspections also provide key information about improvements still needed to NYCHA's properties, including those described in **Section I.6.D** of this report. In 2024, the results of NYCHA's self-inspections revealed that more than 50% of needed repairs were minor and included combination smoke and carbon monoxide alarms, electrical outlet parts, and fire safety notices that NYCHA has an affirmative requirement to repair or replace under HUD regulations. By year-end, the majority of other deficiencies that Maintenance Workers identified included minor-to-moderate paint-related jobs; damaged apartment entrance and interior doors; minor-to-moderate bathtub or shower damage; and improperly locked window gates.

D. Repairs of Deficiencies (Requirement No. I4)

The repair of minor deficiencies during annual inspections is a key area of improvement for NYCHA. Under the HUD Agreement, NYCHA is required to complete minor repairs of deficiencies discovered during annual apartment inspections and develop procedures for scheduling more significant repairs, such as those that require skilled trades workers and high-priority requests.²⁰⁵ The subsections below provide an update on (1) the minor repairs²⁰⁶ completed at the time of annual inspections; and (2) the high-priority repairs required to be completed within 24 hours of the annual inspection.

1. Minor Repairs

NYCHA tracks the units that have minor repairs performed or minor repairs deferred during annual inspections. At the end of 2024, NYCHA reported that Maintenance Workers completed minor repairs in 27% of inspected apartments in 2024, as illustrated in the table below:

Minor Repairs Completed and Deferred		
Calendar Year	Inspected Units with Minor Repairs Performed	Inspected Units with Minor Repairs Deferred
2019	Not tracked	Not tracked
2020	Not tracked	Not tracked
2021	31%	4%
2022	21%	3%
2023	15%	3%
2024	27%	5%

As also shown above, NYCHA reported that Maintenance Workers deferred minor repairs in 5% of completed apartment inspections in 2024. Additionally, NYCHA reported that its inspections identified a total of 100,737 deficiencies that could be fixed with minor repairs. Of those, NYCHA reported that the Maintenance Worker completing the inspection performed the minor repairs for 93,893 and deferred the minor repairs for 6,844. As described in more detail below, however, NYCHA is aware of, and working to fix, issues with how its workers document these repairs.

Specifically, NYCHA has reported that some Maintenance Workers have not been properly documenting deficiencies they listed as minor repairs and that a lack of oversight has allowed these repairs to be regularly deferred without sufficient justification. In 2025, NYCHA has committed to resolving these problems by ensuring accurate documentation of repairs completed and improving oversight of the repairs that are deferred.

a. Documentation of Repairs Completed

By the second quarter of 2025, NYCHA has committed to automating the list of required minor repairs to pre-populate in the handheld device used by Maintenance Workers during the annual inspection. Currently, the handheld allows Maintenance Workers to categorize any observed deficiency as a minor repair, resulting in incorrect data when Maintenance Workers improperly classify issues,

such as skilled trade work, as minor repairs. According to NYCHA, this problem led to an inaccurate recording of minor repairs completed in 2024, with over half of the "documented" minor repairs actually requiring the expertise of skilled trades. Moving forward, NYCHA will automate the list of minor repairs required during the inspection, thereby providing Maintenance Workers clearer guidance on the scope of their tasks and minimizing the chance of incorrect data entry. Thereafter, these improvements will provide NYCHA and the Monitors a more reliable record of the minor repairs completed during annual inspections.

b. Oversight of Repairs Deferred

In addition to ensuring that minor repairs are properly documented, NYCHA must improve its oversight of minor repairs deferred until after inspection. Throughout 2024, Maintenance Workers routinely identified necessary repairs—such as repairs to bathtubs, electrical outlets, and smoke detectors—and deferred these repairs until after inspection without explanation. According to NYCHA, there are, on occasion, specific circumstances where a repair is infeasible and deferring it is appropriate. For instance, a Maintenance Worker might defer replacing a smoke detector if a part is on backorder, requiring them to return to finish the work. Similarly, a repair to an electrical outlet might be postponed if it requires the specialized expertise of an electrician to address wiring faults. To account for these issues, NYCHA is developing a set of "infeasible repair" criteria that it will implement into the handheld used during annual inspections, ensuring that any decision to defer is based on objective, pre-approved criteria only. The Monitors are tracking the implementation and effectiveness of this change and will provide updates on NYCHA's progress in future reports.

2. High-Priority Repairs

As described above, NYCHA also tracks the status of "high-priority" subsequent repair requests that are identified during self-inspections, which include work to address flooding or leaks, high severity pest infestations, inadequate heat, and other emergency conditions.²⁰⁷ For these repairs in 2024, NYCHA reported that it completed more than 96% of high-priority repairs within 24 hours, as illustrated in the graph below:

High Priority Repairs			
Calendar Year	Requested Repairs (Identified During Inspection)	Repairs Completed within 24 Hours	Open Repairs by Year End
2019	8,087	98%	0%
2020	4,021	98%	<1%
2021	13,937	92%	<1%
2022	17,081	90%	<1%
2023	12,946	90%	<1%
2024	89,962	96%	<1%

As also illustrated above, NYCHA reported completing high-priority requests in over 99% of instances by year-end. Of the high priority requests left incomplete by year-end, the majority require NYCHA to install combination smoke and carbon-monoxide alarms as well as a number of remaining repairs that require skilled-trades such as electricians and carpenters.

E. Completed, In Compliance, and Superseded Obligations

The HUD Agreement obligation that NYCHA met prior to the period covered by this report (Requirement No. I2) is listed in Appendix A. The Monitors continue to track the outcomes of this obligation (NSPIRE Action Plan) because of the recent changes to HUD's physical condition standards, NSPIRE.

Overview of Outstanding Inspection Obligations

The following table summarizes the status of NYCHA's compliance with the outstanding requirements of the HUD Agreement as of the end of Year 6, unless otherwise noted. The table categorizes each requirement as a one-time requirement (blue); response obligation (orange); or policy and practice obligation (green).

Req. No.	Description	Status	Compliance Details
One-Time Requirement			
I1 (Ex. B ¶ 49)	Annual Inspections Action Plan: By May 31, 2019, NYCHA must submit an Action Plan for complying with the requirements to conduct annual inspections and perform minor repairs, including procedures for completing on-site repairs and scheduling subsequent repairs.	Incomplete	At the end of Year 6, NYCHA submitted a Phase II Plan for the Monitors' input, which the Monitors are assessing for improvements that will allow NYCHA to reach 100% inspections and complete its repair obligations.
Response Obligation			
I3 (Ex. B ¶ 47)	Annual Inspections: NYCHA will conduct annual inspections of 100% of occupied units.	Partial compliance	In 2024, NYCHA completed inspections in 91% of occupied apartments, and had not yet attempted inspections for 5% of occupied apartments. The Monitors recognize NYCHA's significant progress toward complying with this requirement

			and are tracking NYCHA's efforts to make the improvements described in Section I.6.C.1 of this report.
14 (Ex. B ¶ 48)	Minor Repairs: By May 1, 2019, annual inspections must include having the person conducting the inspection perform any minor repairs during the inspection.	Partial Compliance	In 2024, NYCHA reported that Maintenance Workers completed minor repairs in 27% of inspected apartments and deferred minor repairs in 5% of inspected apartment units. Additionally, NYCHA reported that its inspections identified a total of 100,737 deficiencies that could be fixed with minor repairs. Of those, NYCHA reported that the Maintenance Worker completing the inspection performed the minor repairs for 93,893 and deferred the minor repairs for 6,844. However, NYCHA is aware of, and working to fix, issues with how its workers document these repairs. The Monitors are tracking NYCHA's efforts to resolve these issues, including those described in Section I.6.D.1 of this report.
Policy and Practice Obligation			

15 (¶ 60)	<p>HUD's Guidance: NYCHA will make all improvements in accordance with PIH Notice No. 2016-03, Uniform Physical Condition Standard ("UPCS") Deficiencies and Industry Standard Repairs, July 11, 2016, or any subsequent or superseding guidance.²⁰⁸</p>	Partial Compliance	<p>NYCHA's ongoing efforts to comply with this obligation overlap with its attempts to meet Requirement No. 17. For the 2024 cycle of inspections, NYCHA received an agencywide weighted score of 61 out of 100 and was designated as a "Standard Performer." Still, the majority of NYCHA developments (75 of 138) were not in compliance with HUD's physical condition standards, NSPIRE, at the time of HUD's inspection.²⁰⁹</p>
16 (¶ 60)	<p>Industry Standards: NYCHA will ensure all maintenance repairs are performed to established industry standards and workmanship.</p>	TBD	<p>In 2024, NYCHA's Quality Assurance Unit reported that 95% of sampled repairs were completed up to required standard but acknowledged more infrequently performed repairs (such as exterminations) are typically not selected for sampled inspections, as described in Section I.6.E.1 of the Monitors' December 2024 Report. As a result, the Monitors are still assessing NYCHA's compliance</p>

			with this obligation and will continue tracking NYCHA's efforts to evaluate its repairs.
17 (¶ 60)	Decent, Safe, Sanitary Standards: NYCHA will ensure that properties meet HUD's decent, safe, sanitary, and in good repair standards at all times.	Partial Compliance	NYCHA's ongoing efforts to comply with this obligation overlap with its attempts to meet Requirement No. 15. For the 2024 cycle of inspections, NYCHA received an agencywide weighted score of 61 out of 100 and was designated as a "Standard Performer." Still, the majority of NYCHA developments (75 of 138) were not in compliance with HUD's physical condition standards, NSPIRE, at the time of HUD's inspection.
18 (¶ 60)	Deceptive Practices: NYCHA will not use deceptive practices with respect to PHAS inspections, including: (a) covering up / hiding conditions; (b) performing substandard repairs; (c) performing work in common areas after an inspection begins, other than for emergency health and safety	TBD	The Monitors are not yet in a position to opine whether NYCHA substantially refrains from using deceptive practices with respect to PHAS inspections. The First Monitor found that there had "not been a discernable recurrence of the illegal activities concerning PHAS inspections which ultimately led to the Monitorship." ²¹⁰ The

	issues; (d) performing work in selected or alternate units after such units have been identified, other than for emergency health and safety issues.		Monitors' work to confirm NYCHA's compliance with this obligation, as described in the Monitors' December 2024 Report at Section I.6.F , remains underway.
19 (¶ 61)	Internal Controls: NYCHA shall design internal controls to prevent deceptive practices.	TBD	The detailed procedures set forth in the PHAS Inspections Action Plan appear, in principle, to satisfy ¶ 61's general requirement of internal controls to prevent deceptive practices; however, the Monitors are still assessing both NYCHA's implementation of those procedures and their adequacy to prevent deceptive practices. The Monitors' work to confirm NYCHA's compliance with this obligation, as described in their December 2024 report at Section I.6.F , remains underway.
110 (¶ 62 (a-f))	Chief Compliance Officer Obligations: NYCHA's Chief Compliance Officer will be responsible for preventing deceptive practices	TBD	The Monitors are still assessing NYCHA's compliance with the detailed requirements of ¶ 62. The Monitors' work to confirm NYCHA's compliance

	<p>with respect to PHAS inspections and ensuring compliance with HUD regulations and guidelines with respect to PHAS inspections. Various concrete responsibilities are enumerated in the Agreement.</p>		<p>with this obligation, as described in their December 2024 report at Section I.6.F, remains underway.</p>
--	--	--	--

**SECTION II:
ORGANIZATIONAL CHANGE**

Under the HUD Agreement, NYCHA is required to make broad management and organizational reforms across the agency that will improve its overall functioning and its delivery of services to residents. As discussed in the Monitors' prior reports, NYCHA's plan for doing so is contained in its "Transformation Plan,"²¹¹ which lays out broad principles for improvement and core values for the organization—e.g., "creating a culture of service," "strengthening NYCHA's partnership with its residents," and "using data to drive decision making"—as well as 47 specific initiatives intended to improve NYCHA's processes and performance.²¹² Consistent with those broad principles, NYCHA also works with HUD, SDNY, and the Monitors to identify additional initiatives that will build on those specific projects in order to continue to improve itself as an organization.

In prior reports, the Monitors provided an overview of several of the potentially most impactful initiatives NYCHA is undertaking to achieve organizational change, as well as details about the status and progress of its work.²¹³ In this report, the Monitors first provide updates on significant developments over the last quarter within key areas pertaining to NYCHA's organizational change, followed by a table summarizing the status of NYCHA's progress under each of the 47 initiatives under the Transformation Plan as of the end of Year 6 of the monitorship.

Together, these updates aim to provide transparency to the public concerning NYCHA's work to carry out organizational change. As NYCHA, HUD, SDNY, and the Monitors continue their work to improve NYCHA as an organization, their efforts will be covered by future reporting.

A. Key Areas Update

1. Neighborhood Model

The stated goal of NYCHA's Neighborhood Model is to make operational decision-making less dependent on staff at NYCHA's central office and bring it closer to the developments themselves.²¹⁴ As described in **Section III.C** of the Monitors' August 2024 Report, to implement the Neighborhood Model, NYCHA re-organized its properties into 29 "Neighborhoods," consisting of closely located developments, created the position of Neighborhood Administrator to oversee developments in each neighborhood and serve as their

connection to the centralized NYCHA offices, and launched the role of Neighborhood Planner to coordinate the scheduling of in-unit repairs for residents.²¹⁵ NYCHA also sought to implement this plan by creating borough-level liaison positions whose role is to coordinate between central-office functions—like HR—and the properties. However, at the conclusion of Year 6, NYCHA has not moved many central-office or borough-level positions to the neighborhood- or development-level, as contemplated by its original Neighborhood Model proposal.²¹⁶ NYCHA attributes this to resource constraints. NYCHA now plans to implement the stated goals of the Neighborhood Model set forth in the Transformation Plan, such as “providing a stronger link between Property Management and the support functions,” not by moving these functions to the properties, but by re-orienting central support toward the neighborhoods, and strengthening the connection of its central-office and support-service functions to the neighborhoods. Thus, NYCHA’s progress in implementing the Neighborhood Model during Year 6 consisted of a series of improvement initiatives designed to achieve these goals of the Neighborhood Model, such as empowering Property Management staff to better manage their own properties, and providing more direct and responsive support from NYCHA central offices. These initiatives are described in more detail in **Section II.C** of the Monitors’ December 2024 Report.²¹⁷

Representatives from NYCHA, HUD, and the Monitor team developed, planned, and began executing on these initiatives over the course of Year 6. By the end of Year 6, NYCHA launched a beta version of a new electronic tool called Department Connect, an enhanced directory tool designed to provide Property Management staff with quick and easy access to the appropriate NYCHA central office contact for a variety of day-to-day development issues. Initial feedback on the tool has been positive, and the Monitors will continue to assess its roll-out and ways in which the tool can be improved to allow for greater central-office responsiveness to developments’ needs.

Looking ahead, the Monitors will continue their engagement with NYCHA on these Neighborhood Model initiatives in Year 7 in order to move NYCHA closer to the goal of empowering its developments to respond adeptly to the challenges they face. The Monitors will also assist NYCHA in an analysis of what additional

personnel and resources should be allocated or reallocated to the Neighborhood or development level.

2. Work Order Reform

NYCHA adopted Work Order Reform to improve the manner in which its maintenance workers and skilled trades workers perform in-unit repairs, to provide residents with more transparency about the number of appointments that would be needed to fix problems in their apartments, and to increase the efficiency of the overall repair process. While Work Order Reform has increased NYCHA's ability to manage its large backlog of repairs through the addition of skilled trades workers and gains in their efficiency and productivity, this backlog remains unsustainably large, at more than 600,000 open work orders, roughly half of which are assigned to borough-based skilled-trades workers, and it continues to grow. As a result, residents often must wait many months for necessary repairs. NYCHA's position is that additional resources are required for it to make meaningful progress in reducing the work-order backlog and reducing residents' wait time. NYCHA's position is that through Work Order Reform, it has improved its productivity and the number of work orders that it closes out in a given month; however, work orders are being created at a higher rate, as a result of a variety of factors, such as HUD's requirement to inspect 100% of all apartments annually. Moreover, NYCHA points to the rapid growth of the work-order backlog during the pause in in-unit repairs that NYCHA was required to observe during the COVID-19 pandemic.

While the Monitors recognize that NYCHA has shown productivity gains resulting in faster completion of work orders as a result of Work Order Reform and related practices, they are still assessing the validity of NYCHA's claims regarding the causes of the backlog increases, such as increased annual apartment inspections. In any case, the work order backlog remains unsustainably large, leading to long wait times, and NYCHA's increases in productivity will not be sufficient to meaningfully reduce that large backlog. Accordingly, by the end of Year 6, NYCHA began working with HUD, SDNY, and the Monitors to develop a plan to address apartments requiring significant repairs, as well as to reduce the wait times residents face when requesting skilled-trades work in their apartments.²¹⁸ This effort is intended to focus on deficiencies related to mold and leaks, which are the largest portion of the skilled-trades backlog and have a profound impact on residents' health and

wellbeing. The parties are still working to determine the contours of this plan—including its budget, timeframe, and operational issues such as sources of additional labor—but the aim is to identify and prioritize apartments with the worst conditions.

As described in **Section II.B** of the Monitors' December 2024 Report, the Monitors have also been working with NYCHA on the manner in which it communicates with residents regarding in-unit repairs.²¹⁹ By the end of Year 6, NYCHA and the Monitors completed work on the creation of a dashboard to track the number of appointments for in-unit repairs missed by skilled-trades workers. Following months of refining the data depicted by the dashboard, the Monitors and NYCHA have recently come to agreement on how the missed appointments are measured. During the full calendar year of 2024, skilled-trades workers missed approximately 12% of all scheduled appointments with residents. NYCHA and the Monitors will use the dashboard to attempt to determine the reasons for missed appointments, devise ways to reduce the number of missed appointments, and improve NYCHA's ability to promptly notify residents when it will miss a scheduled appointment.

The Monitors are also continuing to evaluate how NYCHA communicates with its residents more broadly; the Monitors described this analysis in more detail in **Section II.B** of the Monitors' December 2024 Report. In Year 7, the Monitors will continue this analysis to identify best practices to be standardized throughout the organization. NYCHA has also committed to improving its systems for keeping resident contact information up to date and making sure it is available to NYCHA staff when they need it, as well as to planning for IT upgrades including a text-messaging system.

3. Performance and Accountability

Two of the Monitors' top priorities within Organizational Change include assessing how NYCHA is systemically improving its workers' performance for residents across the agency and how it is holding itself and its workforce accountable. Two broad areas in which NYCHA has implemented performance and accountability reforms include (1) performance evaluations; and (2) dashboards and data monitoring.

NYCHA committed to evaluating its workforce in the Transformation Plan, consistent with the personnel practices of many

other public housing agencies. After years of delay in moving forward on implementing performance evaluations, in Year 6 NYCHA created a system for evaluating its managerial workforce and conducted performance evaluations for managerial employees in January 2025. Additionally, NYCHA has committed to developing a pilot evaluation program that can eventually extend to its entire workforce in collaboration with the Local 237 union, which represents much of NYCHA's Property Management personnel. The Monitors commend NYCHA for agreeing to take concrete steps toward this important goal and will stay involved in overseeing and supporting this process, including reporting on and assessing the results of NYCHA's first managerial performance evaluations.

As described in **Section II.D** of the Monitors' December 2024 Report, NYCHA also made improvements during Year 6 in its use of real-time data to assess its performance on a day-to-day and monthly basis.²²⁰ NYCHA personnel regularly consult data dashboards that show its performance in key areas, such as completion of repair work orders, and the Monitors have been working with NYCHA to improve its dashboards for areas such as NYCHA's Quality Assurance of those repairs, missed appointments (as discussed above), and the various metrics contained in the HUD Agreement.²²¹ These metrics by which NYCHA measures its performance are commonly referred to as Key Performance Indicators ("KPIs"). NYCHA should continue to expand its use of KPIs in order to track all of the necessary metrics that will assist its Property Management staff in improving their properties' performance and train those personnel on the regular use of this data as well.

4. Training

Enhanced training processes across the entire agency are a key goal of the Transformation Plan.²²² Throughout Year 6, the Monitors coordinated with NYCHA's Learning and Development Department ("L&D"), which was moved to sit within NYCHA's Support Services Department so that it is better integrated into NYCHA Operations, as described in **Section III.C.5** of the Monitors' August 2024 Report.²²³ In collaboration with the Monitors, NYCHA has designed a survey to collect information on trainings that have been developed by various departments.²²⁴ Additionally, NYCHA has worked to incorporate these trainings into the Learning Management System so that training can be tracked for each employee.²²⁵ By the end of Year 6, NYCHA

had developed an enhanced training program for maintenance workers, reflecting their central role in delivering resident services.

A project team of Monitor and NYCHA personnel have also assessed NYCHA's existing trainings for staff in three key areas: supervisory and leadership skills, de-escalation of conflicts between and among NYCHA staff and residents, and customer service.²²⁶ In the Monitors' view, NYCHA had effective training content pertaining to these areas, but the trainings were only being offered to a small portion of employees, as opposed to all Property Management staff that interact with NYCHA residents.²²⁷ Moreover, the trainings are not always delivered at the times at which they would be most valuable; for example, newly promoted supervisors may not receive supervisory trainings at the time of their promotion. Accordingly, the Monitor team has worked with L&D to develop a plan for NYCHA to expand its provision of these trainings, including by training existing NYCHA staff to be auxiliary trainers who can then provide these trainings to other NYCHA personnel.

B. Transformation Plan Milestones

In addition to the initiatives described above, NYCHA also committed to other efforts to reform itself in its Transformation Plan. The table below describes NYCHA's progress toward completing the 47 initiatives that NYCHA proposed in the Transformation Plan. Consistent with how NYCHA groups the initiatives, the table categorizes each initiative into five groups: Strategy and Innovation Initiatives; Administrative Initiatives; Asset and Capital Management; Information Technology; and Procurement. The table includes language derived from the milestones as defined in the Transformation Plan, followed by NYCHA's own report on the status of each project and comments from the Monitors. The Monitors are continuing to assess both NYCHA's progress in completing these projects and the impact of these projects on NYCHA's organizational transformation.

At the conclusion of Year 5, the First Monitor reported that of the 337 "milestone activities" that NYCHA identified as necessary for completing these 47 projects, 74% were completed according to NYCHA.²²⁸ By the end of Year 6, NYCHA reports that it has completed 80% of its milestone activities.²²⁹

While NYCHA’s attempt to quantify its progress gives some sense of what has been accomplished, there are three reasons it might not give an accurate picture of how much NYCHA has done and how much remains to be done to realize the Transformation Plan’s goals. First, NYCHA’s reports measure progress by the total number of completed milestones. While each incremental milestone does indicate progress, not all milestones involve similar amounts of work or similar challenges. Second, the Monitors are still in the process of verifying the completion status of various milestones. In some cases, NYCHA and the Monitors may disagree as to the meanings of key terms and operative phrases in the milestone as described in the Transformation Plan. Some such cases will be noted in the Monitors’ comments below, while others may not yet have been identified. Third, the table below should not be taken as an exhaustive list of work remaining to complete NYCHA’s transformation. The framework provided by the Transformation Plan could not have foreseen every organizational reform that would be needed to achieve the Plan’s goals, and the plan must therefore be supplemented and refined as it is implemented. Thus, completed milestones will not always reflect the end of work in an area. In fact, substantial work will often be needed to ensure the sustainability of reforms beyond the initial rollout.

Strategy and Innovation Initiatives			
ID	Project	NYCHA Reported Status	Monitors’ Comments
1.1	C-Suite / Governance Changes - Changes to the NYCHA Board and executive leadership structure, including separating the roles of Chair of the Board and Chief Executive Officer (CEO) into two positions and creating a new	Complete; closed out on February 16, 2022	While NYCHA has made the specified changes to its Board, the Monitors are continuing to assess whether the governance reforms have had their intended effect and, in particular, whether a deferred plan for Board training should be revived.

Transformation Plan Project “Close-Out”:

Once NYCHA determines that it has completed a project by completing all of the specific tasks associated with the project, it formally “closes out” the project in a presentation to the Monitor. While this close-out means that NYCHA believes it has completed the necessary tasks for this project, the Monitors will continue to assess its impact and how NYCHA is performing in this area.

	committee structure to enhance the role of the Board of Directors.		
1.2	Neighborhood Model - Strategic decentralization of NYCHA departments to bring services closer to Neighborhoods and developments.	In progress	While NYCHA has organized its properties into 29 Neighborhoods and appointed Neighborhood Administrators and Neighborhood Planners for each, it has not moved much of the central-office and support-service staff to the properties in the manner specified in the original plan for the Neighborhood Model. NYCHA's subsequently announced Implementation Plans and milestones have pertained more to the changes in how the neighborhoods are organized and the creation of neighborhood staff positions. In coordination with the Monitors, NYCHA is engaged in several improvement initiatives in order to realize this goal within its constraints.
1.3	Work Order Reform - Move skilled trades workers closer to the property level to improve the delivery of corrective-	In progress	NYCHA has substantially implemented the changes identified under the Work Order Reform initiative and reports that they have had a positive impact on productivity. However, the Monitors are still assessing whether certain elements

	maintenance services.		of the plan are adequately implemented. In particular, the reassignment of high-demand skilled trades to the neighborhood level may require further effort or revision to NYCHA's plan. In light of the large and growing work order backlog, significant work remains to be done in this area, beyond specific milestones, such as the backlog reduction project discussed in Section II.A.2 of this report. The Monitors will continue their assessment of this and other topics related to Work Order Reform and will engage with NYCHA on further efforts to measure and improve the productivity of the skilled trades and reduce wait times for repairs.
1.4	Property-Based Caretaker Scheduling - Roll back of the Alternative Work Schedules ("AWS") program	Completed December 30, 2022; project closed out on February 5, 2025	<p>Prior to the Transformation Plan, NYCHA had implemented AWS for caretakers that allowed for a smaller number of longer shifts per week. After strong negative feedback from staff and residents alike, NYCHA implemented this project to roll back AWS, and adopt caretaker scheduling that is more flexible for each property.</p> <p>NYCHA reports that this project empowers Property Managers by granting them discretion in how caretakers and supervisors</p>

			are scheduled to best serve the needs of a development, and has resulted in improvements to developments' cleanliness. The Monitors are still assessing these claims.
1.5	Borough Administration Teams - Create dedicated administrative teams embedded in each borough.	Completed April 30, 2024; project to be formally closed out	Rather than embedding new administrative teams in each borough, NYCHA has attempted to enhance coordination between the central office and the borough offices by creating borough liaison positions for various administrative functions such as HR and Finance. The Monitors are continuing to assess the efficacy of these reforms and will work with NYCHA to find ways to best realize the goals of this initiative. This may include assessing whether the borough liaison positions, some of which are quite limited in scope, can be expanded in order to support local Property Management staff more broadly.
1.6	Asset Information and Strategy - Develop an Asset Information Strategy ("AIS") and a design for an Asset Information Management	In progress	This initiative aimed to create a single, authoritative source for asset information and leverage geography to improve work order efficiency, supply availability, and the diagnosis of underlying building failures. NYCHA has taken some initial steps

	System ("AIMS").		<p>on this project that, in the Monitors' view, have improved coordination between the Asset & Capital Management, Property Management, and other Operations departments with respect to waste- and fire-safety-related issues. However, due to budget constraints and shifting organizational priorities, NYCHA has not yet fully developed AIMS. Instead, NYCHA has shifted this project to focus on setting clear guidelines for structuring and standardizing its asset data, as well as improving processes for transferring asset information during and after capital projects to better integrate with Maximo, NYCHA's asset management software. The Monitors will continue to engage with NYCHA on its plan to complete this initiative.</p>
1.7	<p>Performance Management - Create a streamlined set of Key Performance Indicators ("KPIs").</p>	<p>Complete; project closed out on February 5, 2025</p>	<p>The Consolidated Report Card dashboard aimed to document NYCHA properties' performance in a simple and easy-to-read format. It was officially launched in 2024. The Monitors are working with NYCHA to enhance its usefulness by introducing new KPIs and enhancing the user's ability to access data underlying each KPI.</p>

1.8	<p>NYCHA-STAT/Borough STAT - Monthly meetings to explain trends on key performance metrics such as rent collection, rent delinquency, annual recertifications, maintenance and skilled trades work orders, vendor work orders, apartment prep time and turnaround time for re-occupancy, etc.</p>	<p>Completed December 21, 2022; project closed out on February 5, 2025</p>	<p>NYCHA has established a series of monthly STAT meetings covering the prescribed topics, incorporated enhanced data reporting, and introduced the discussion of "case studies" design to reflect on NYCHA performance related to the meeting topic. The Monitors attend each NYCHA STAT meeting and are working with NYCHA to assess whether these meetings are furthering the Transformation Plan's "vision . . . to imbed NYCHA Stat principles in the day-to-day operations of the agency."</p>
1.9	<p>Automated Communication/Closed Work Tickets - Develop improved resident communications processes and methods.</p>	<p>Complete; project closed out on February 5, 2025</p>	<p>Although improvements have been made to the resident-communications process related to in-unit work, residents continue to experience missed appointments and inappropriately closed work tickets. The Monitors are closely following NYCHA's efforts to improve resident communications in several departments and will work with NYCHA to identify best practices to be implemented more widely, including the adoption of a new IT system that will allow for the expansion of text messaging with residents.</p>

1.10	<p>Property Based Budgeting/Finance - Give Property Managers more control and transparency of their budgets.</p>	Complete; project to be formally closed	<p>In the Transformation Plan, NYCHA stated a goal of “strengthening the property-based budgeting process to better train and empower Property Managers to develop and manage their property budget,” in order to comply with HUD asset management requirements, which promote greater responsibility for each development’s budget by those with direct oversight over the property. Thus, the Transformation Plan stated that rather than requiring Property Managers to submit all budget requests through borough offices, they would play an enhanced role in the creation of their budget and submit budget requests to Operations leadership directly.</p> <p>In the subsequent implementation plans, NYCHA set and then carried out a number of milestones that promoted extensive budget training for Property Managers, increased transparency into the budgetary process, and greater local control. NYCHA reports it has completed all milestones associated with this project.</p> <p>Despite this progress, it is the Monitors’ view, as well</p>
------	---	---	---

			<p>as HUD's, that NYCHA Property Managers are not yet consistently able to own and manage much of their budgets consistent with the originally stated goals of this project.</p> <p>The Monitors will work with NYCHA Finance to assess progress against Property Based Budgeting's original objectives, determine factors inhibiting effective management of budgets at the property level, and collaborate on solutions.</p>
1.11	<p>Resident Round Table - Create a body of representatives from each Neighborhood to conduct research, propose solutions, and serve as a focus group for new initiatives.</p>	Complete; formally closed out	<p>The Resident Roundtable has been established and, in the Monitors' view, provides valuable perspective and feedback on NYCHA initiatives. The Monitors will continue to track the Roundtable's recommendations to NYCHA and report on noteworthy ones.</p>
1.12	<p>Learning and Development - Centralize tracking and oversight of training throughout the agency</p>	In progress	<p>The final milestone for this project—the construction of a Heating Training Center—is expected to be completed in Q3 2025. Thus far, the re-organization of the Learning and Development department strengthened oversight of training throughout the agency. However, scarcity of trainers and training space</p>

			persists. The Monitors are collaborating with Learning and Development on a proposed Auxiliary Training program with the intention of creating a team of internal NYCHA trainers made up of workers who are identified as excellent at their job and qualified to train others.
1.13	Create Project Management Office - Create a Project Management Office ("PMO") to coordinate the execution of larger-scale operational initiatives across all four boroughs.	Complete; formally closed out as of December 31, 2021	NYCHA has created an active Transformation PMO that continuously assesses the status of each Transformation Plan project and milestones. The Monitors work closely with the Transformation PMO and will work in Year 7 to better assess the impact of each project.
1.14	Streamline Annual Recertification Process - Redesign the process for residents' annual recertification of their income and eligibility for rental assistance.	Complete; formally closed out as of December 31, 2021	Although NYCHA reports that it completed work on this project, the Monitors are assessing its efficacy and will work with NYCHA to determine whether the process has benefitted residents as intended (e.g., by improving calculations of rent and reducing processing delays).
1.15	Lease Enforcement Process - Establish new prioritization criteria and	Complete; formally closed out as of December 30, 2022	While NYCHA has overhauled its administrative-action priorities for lease enforcement and re-organized its legal

	<p>decision tree for cases, discontinue cases, and establish a set of priority non-pay actions for immediately after the eviction moratorium is lifted.</p>		<p>department to align with the new priorities, it deferred many of its milestones within this project that would provide better analysis and data on its lease enforcement. The Monitors will continue to engage with NYCHA on potential improvements to the lease enforcement process, which should result in improved living conditions for NYCHA residents by reducing negative effects caused by a small portion of residents in certain developments.</p>
1.16	<p>Community Partnerships - Enter into a long-term net license or other agreement with the City agencies and their Community Based Organization ("CBO") users that use space in NYCHA developments.</p>	Deferred	<p>CBOs operate many community centers on NYCHA property that provide essential services to NYCHA residents, including daycare, Pre-K, and meals for seniors. A large majority of them do not have a lease, which creates an ambiguity about whether NYCHA or the CBO is responsible for repairs. NYCHA should reassess the impact of operating CBOs without active leases and work with the City to formalize the responsibilities of each of the parties.</p>
1.17	<p>Strengthen Engagement with Community Partners - New investment to deepen</p>	Deferred	<p>This project has been deferred due to reorganization of NYCHA's Department of Community Engagement and Partnerships ("CEP"). The Monitors will work with</p>

	partnership opportunities and provide more dedicated resources to residents.		NYCHA to assess whether this reorganization has realized the intended benefits to residents.
1.18	Alternative Work Schedules (“AWS”) for Maintenance Workers	Deferred	As set forth above with respect to Project 1.4 (Property-Based Caretaker Scheduling), this project was deferred based on strong negative feedback from NYCHA employees and residents. The Monitors will work with NYCHA to assess other ways for achieving the intended benefits of AWS for maintenance workers, including increased responsiveness for maintenance work required on evenings and weekends and reduced reliance on overtime.
1.19	Data Governance - Establish a set of processes, policies, standards, and technologies required to manage and ensure the availability, accessibility, quality, consistency, integrity, auditability, and security of data	Deferred	This project was deferred due to lack of funding. However, NYCHA has recently indicated that there is a budget allocation for it in fiscal year 2025. NYCHA IT and the Office of Strategy and Innovation (“S&I”) have expressed to the Monitors that it views this project as a crucial improvement, and the Monitors will work with NYCHA to support and assess this project.

	within the organization.		
--	--------------------------	--	--

Administrative Initiatives			
ID	Project	NYCHA Reported Status	Monitors' Comments
2.1	Employee Engagement Initiatives - Expand suite of employee engagement programs.	Complete; formally closed out on October 23, 2023	As part of this initiative, NYCHA created a Change Ambassador network, employee recognition programs, a coaching and mentoring program for Property Management staff, and a health-and-wellness program. The continued funding and growth of these programs today show NYCHA's continued dedication to improving employee engagement. The Monitors will continue to track these developments.
2.2	Performance Reviews - Launch a managerial performance-review process and plan a non-managerial performance-review process.	In progress	The managerial performance-evaluation process launched in January 2025. The Monitors have provided feedback on improvements for the current launch and will continue to provide suggestions for the next phase of performance evaluations. In tandem with the performance-review initiative, the Monitors will be working with NYCHA on developing and implementing job descriptions.

			<p>NYCHA has also committed to the next step of planning non-managerial performance reviews in coordination with Teamsters Local 237, and the Monitors will engage closely with NYCHA in this planning process.</p>
2.3	<p>Learning Management System - Launch a centralized system to deliver and track employee training.</p>	<p>Complete; formally closed out in October 2022</p>	<p>NYCHA launched a Learning Management System ("LMS") called "Cornerstone" that allows NYCHA to track learning progress and performance for staff engaged in trainings. The LMS further provides an online portal for staff to complete the trainings.</p> <p>The Monitors are tracking NYCHA's ongoing efforts to incorporate all training into the LMS for tracking and career development planning purposes. Once the new HR system is fully implemented, the employee data from the HR system will flow into the LMS. NYCHA and the Monitors have collaborated on a survey to collect information on training that has been developed by departments and ensure registration of courses in the LMS.</p>
2.4	<p>Enhanced Employee Engagement Efforts -</p>	<p>In progress</p>	<p>NYCHA launched the Employee Suggestion Program in December 2024. The Monitors will</p>

	Develop and launch an Employee Suggestion Program ("ESP").		assess the use and effectiveness of this program as it develops by requesting and reviewing the program procedures and examining data relevant to use of suggestions and response to employees.
--	--	--	---

Asset and Capital Management			
ID	Project	NYCHA Status	Monitors' Comments
3.1	Building Information Modeling ("BIM") and Computer Aided Design ("CAD") Standards - Implement BIM/CAD standards.	Complete; formally closed out in March 2024	NYCHA developed the BIM/CAD Standards Manual and the BIM Project Execution Plan in 2023 and completed the initial training for the Architecture and Engineering Services Team. Next, NYCHA will expand BIM integration to construction and project planning, providing training for project managers, to streamline document management, model viewing, and workflow coordination. The Monitors will track NYCHA's progress in implementing BIM/CAD standards across project phases, including by reviewing whether BIM models are being used in projects and whether processes are in place to support their effective adoption.

Building Information Modeling ("BIM") and Computer-Aided Design ("CAD") Standards: Guidelines that ensure consistency, accuracy, and compatibility in digital building designs and documentation. CAD is used for producing detailed drawings and models, while BIM builds upon CAD by incorporating data and collaboration tools to manage the entire lifecycle of a building. These standards help streamline design, improve coordination, and enhance efficiency in construction and engineering projects.

3.2	<p>Physical Needs Assessment (PNA) - Conduct and analyze a Physical Needs Assessment.</p>	Complete; formally closed out in March 2024	<p>NYCHA conducted a PNA in 2023 and intends to update the PNA every five years to follow the HUD recommendation.²³⁰ The Monitors anticipate that NYCHA will begin to plan for its next PNA in late 2026 or early 2027 by identifying a project team and beginning the vendor-procurement process.</p> <p>The Monitors will track NYCHA's efforts to regularly update PNA data to reflect completed capital work and market cost changes and to incorporate this information into capital planning.</p>
3.3	<p>Expand Use of KPIs for Capital Projects - Create and use new KPIs and Dashboards and apply added insight to improve project delivery.</p>	Complete; project to be formally closed out	<p>According to NYCHA, additional KPIs for capital projects—covering areas such as schedule, cost, change orders, and invoice processing—were implemented by March 31, 2023.</p> <p>The Monitors will track and report on the completion of these KPIs, including whether the portfolio-wide dashboards reflecting these KPIs were developed and integrated into project management processes. As part of this effort, the Monitors will review both the availability and use of relevant performance reporting, as well as NYCHA's subsequent</p>

Physical Needs Assessment ("PNA"): A comprehensive evaluation of a building's condition to identify necessary repairs, maintenance, and upgrades. It helps determine the costs and priorities for keeping the property safe, functional, and up to standards.

e-Builder: A cloud-based project management software designed for capital projects. It helps organizations track budgets, schedules, documents, and workflows in one centralized system, improving efficiency, transparency, and collaboration.

e-Comply: A compliance management software used to automate certified payroll tracking for capital projects. It helps ensure that contractors and subcontractors comply with prevailing wage laws by streamlining reporting, verification, and oversight, improving accuracy and accountability.

			approach to performance tracking and corrective actions.
3.4	<p>System Enhancements</p> <ul style="list-style-type: none"> - Improve operational efficiency through the implementation and use of an array of technological tools. 	Complete; formally closed out in March 2024	<p>In 2022, NYCHA integrated key project lifecycle processes into e-Builder, including project initiation, NYC Office of Management & Budget submissions, and subcontractor approvals. NYCHA also began using e-Comply to automate certified payroll tracking, which ensures contractors and subcontractors on its projects comply with prevailing wage laws.</p> <p>As part of its ongoing system enhancements, NYCHA plans to continue improving operational efficiency through technology, including a 2025 initiative to enhance vendor management and performance tracking. The Monitors will track NYCHA’s progress in implementing these technological improvements and assess whether they effectively support operational efficiency and oversight.</p>
3.5	<p>Request Utility Waiver from HUD to Capture Savings - Maximize utilities savings</p>	Complete; formally closed out in March 2024	NYCHA requested the waiver as planned, but HUD denied its request, meaning that the anticipated savings were not realized.

	by submitting a waiver to HUD.		
3.6	<p>Align Portfolio and Capital Projects Planning - Improve portfolio and capital projects planning approach by improving coordination, internal and external communication, and the use of data.</p>	Complete; formally closed out in March 2024	<p>According to NYCHA, it has improved coordination and communication in capital planning through regular Strategic Investment Planning meetings and a more structured process for prioritizing capital needs.</p> <p>In 2025, NYCHA plans to review and refine the structure and operating plan for the Strategic Asset Management Committee to strengthen short- and long-term capital planning and RAD/PACT conversion projects. NYCHA is also engaging property staff and resident leaders in quarterly discussions on capital projects and priorities, with one meeting each year dedicated to reviewing the 5-year capital plan for that specific site. The Monitors will track NYCHA's progress in implementing these efforts and their impact on improving capital planning and decision making.</p>
3.7	<p>Strengthen Stakeholder Engagement in Capital Project Scoping, Design and Handover - Ensure that capital</p>	Complete; formally closed out in March 2024	NYCHA has developed and implemented a standardized stakeholder engagement protocol, integrated resident and operations touchpoints into project management plans and e-Builder reporting, and conducted a

	<p>investments in NYCHA's properties are scoped, designed, and delivered around the needs of the residents and the property staff.</p>		<p>full-day stakeholder engagement training for staff in 2023.</p> <p>In 2024, NYCHA reported plans for ongoing improvements, including piloting a Stakeholder Engagement Survey for each capital project, with insights used to refine procedures as needed. Additionally, NYCHA plans to improve the handover of specific asset types to Operations, incorporating a one-page guide on turnover protocols initially focused on heating asset turnover, roofs, and entryways; guidance on the use of Maximo as a central database for asset management; and the integration of BIM in asset management.</p> <p>The Monitors will track NYCHA's progress in implementing these continuing improvements and confirm whether stakeholder engagement procedures, asset handover protocols, and supporting tools are consistently applied across projects.</p>
<p>3.8</p>	<p>Improve Project Delivery - Strengthen capital projects delivery and</p>	<p>In progress</p>	<p>NYCHA has designed and implemented enhancements to schedule management policies, practices, controls, and staff training, as well as developed improved, data-</p>

	schedule management.		<p>driven and risk-based project-scheduling templates.</p> <p>In collaboration with the Monitors, NYCHA has made progress in developing a program-level risk register approach for major capital programs and projects; however, the pilot, refinement, and rollout of this approach have been delayed. The Monitors will track NYCHA's progress in advancing this initiative and its implementation across capital programs.</p>
3.9	<p>Enhance Transparency & Accountability</p> <p>- Launch a publicly available Capital Projects Tracker.</p>	Complete; project to be formally closed	<p>NYCHA has launched the Capital Projects Tracker, providing residents and stakeholders with access to project status updates. Resident focus groups contributed input during its development and have provided positive feedback on its usefulness for tracking projects in their communities.</p>
3.10	<p>Strengthen Vendor Compliance - Implement an e-compliance solution for capital projects contracts.</p>	Complete; project to be formally closed	<p>NYCHA has implemented e-Comply to strengthen compliance with prevailing wage laws, Minority- and Women-Owned Business Enterprises participation goals, and Section 3 requirements for hiring and contracting opportunities for low-income residents. The system is now in use, with staff and vendor</p>

Section 3: Section 3 of the Housing and Urban Development Act of 1968 requires recipients of certain HUD funding, including NYCHA, to provide training, employment, contracting, and other economic opportunities to low-income persons (especially recipients of government assistance for housing) to the extent possible.

			<p>training completed and a support model in place.</p> <p>The Monitors will track NYCHA's progress in using e-Comply to monitor vendor compliance with these requirements in capital projects.</p>
3.11	<p>KPMG Organizational Assessment - Address recommendations for improvement.</p>	<p>Complete; formally closed out as of August 2023</p>	<p>According to NYCHA, it has completed several organizational improvements based on the Organizational Assessment completed by KPMG LLP, a management consultant retained pursuant to the HUD Agreement, focusing on data-driven decision-making, project execution, and staff training. Key efforts include consolidating stakeholder information, identifying additional KPIs, and enhancing visual reporting through dashboards in e-Builder.</p> <p>The Monitors will track NYCHA's progress in maintaining and refining these initiatives, ensuring that enhanced reporting, oversight structures, and staff training continue to support effective capital-project execution.</p>

Information Technology			
ID	Project	NYCHA Status	Monitors' Comments
4.1	Holistic IT Strategic Direction - Conduct a large-scale organizational redesign and publish a 3-year Strategic Plan.	Complete; project to be formally closed	NYCHA IT published a 3-Year Strategic Plan in May 2022 and is now in the process of updating it. The Monitors will review the plan in order to validate what has been successfully implemented, identify gaps, and outline remaining priorities. While the initial plan provided a foundation for IT strategy, a structured evaluation and refresh would ensure continued alignment with NYCHA's long-term goals.
4.2	Application Portfolio Optimization - Validate existing application inventory, assess current technology for business and technical fit, and develop an Application Strategy and Roadmap.	Complete; project to be formally closed	<p>By August 2022, NYCHA IT produced a Business Application Strategy, a Technology Roadmap, and a Technology Modernization and Governance Framework. These actions are collectively aimed at ensuring that NYCHA's existing technology resources are well suited to the myriad functions they support across the organization.</p> <p>It is best practice to update these documents every 3-5 years. NYCHA should keep the operations employees and IT staff who support or use the applications informed of any updates. NYCHA should also monitor the impact of</p>

			<p>these strategies and roadmaps in order to help ensure that its employees who are key users of those systems have clarity on how they are related.</p>
<p>4.3</p>	<p>Launch a New Resident Case Management System</p>	<p>In progress</p>	<p>NYCHA’s Resident Case Management System (“RCMS”) overhaul will replace multiple existing systems used by or for NYCHA residents with an improved system. These systems range from online self-service portals to a MyNYCHA app, all aimed at improving and streamlining residents’ interactions with NYCHA. The overhaul also includes changes to NYCHA’s internal software and resources, which will allow NYCHA to better monitor and respond to resident needs.</p> <p>The project has experienced delays, but NYCHA plans on rolling out portions of RCMS in Year 7. The Monitors will work with NYCHA as it manages its external vendors, focusing on mitigating current delays and working to prevent future ones.</p> <p>This project is a high priority for NYCHA and the Monitors, as it directly impacts the NYCHA resident experience including, for example, the</p>

			manner in which NYCHA communicates with residents.
4.4	Implement New IT Operating and Engagement Model	Complete; project to be formally closed	<p>The purpose of this initiative was to reform and bring consistency to the process by which IT receives, evaluates, refines, prioritizes, and delivers service requests from other departments. NYCHA designed and implemented an overhaul of this process and in particular has attempted to improve communication between IT and the departments it supports by creating Business IT Liaisons (“BITLs”).</p> <p>However, NYCHA generally has not been able to maintain the resources to support business client services closer to the property-management level and in many cases is struggling with a significant project pipeline backlog resulting in delayed timelines to address critical business demands. It is recommended that the department review their existing governance and workflow processes to identify performance challenges.</p> <p>Changes are being implemented in 2025 based on a performance assessment of the new IT intake process. The</p>

			Monitors will track these changes closely and continue to engage with NYCHA about how to improve IT's ability to deliver essential tools and services across the organization.
4.5	Cybersecurity and QA - Implement new procedures to improve cybersecurity visibility and response capabilities and institute testing in each stage of the solution development life cycle.	Complete; project to be formally closed	NYCHA has established a centralized cybersecurity program, but the Monitors have not yet assessed its effectiveness. The Monitors will engage with NYCHA to assess and monitor its implementation, including reporting on ongoing phishing tests, continued training, and ensuring proper governance.
4.6	IT Service Management ("ITSM") Process Standardization - Adopt the internationally recognized Information Technology Infrastructure Library ("ITIL®") framework for IT service management ("ITSM").	Complete; project to be formally closed	<p>The ITIL framework provides a comprehensive set of guidelines and methodologies for operating IT with a focus on user experience, which mirrors NYCHA's goals for transforming IT. NYCHA's new IT Service Catalog was deployed on August 5, 2024, on the ServiceNow platform, which expands the number and types of IT requests made within NYCHA into one standardized platform.</p> <p>While ServiceNow is operational, NYCHA is actively working with the vendor to refine data capture for more accurate</p>

			<p>reporting and management. A key focus is differentiating between incidents, requests, and enhancements, as current classifications are skewing key performance indicators.</p> <p>To provide interim visibility, the IT department developed a Power BI dashboard that tracks service performance using ServiceNow data. This has given leadership its first high-level view of NYCHA's IT operations, revealing systemic challenges, including a significant backlog of open incidents and requests. Addressing these issues will require dedicated resources and process improvements.</p> <p>NYCHA is also finalizing revised Service Level Agreements (SLAs), standardizing ITSM processes, and training staff on proper categorization and management protocols. A structured review process will be essential to ensure adoption and alignment with key performance metrics.</p> <p>Progress is being made, but ServiceNow's long-term effectiveness as NYCHA's ITSM platform will depend on continued data cleanup, process</p>
--	--	--	---

			refinement, and governance to drive sustainable improvements.
4.7	Launch a New Human Capital Management System ("HCMS")	In progress	<p>NYCHA's HCMS overhaul is a consolidation and improvement of several systems currently used by NYCHA HR. NYCHA's goals for this new and improved system include improving data quality and reliability across the agency, speeding up various processes, making various HR processes more efficient, and improving communications between various departments for HR functions like recruiting, benefits, and timekeeping. The project is still in progress, and over a year behind its original target dates.</p> <p>NYCHA expects a limited rollout of HCMS for use by the HR department only in the middle of 2025, with a rollout for use across NYCHA coming later in the year. Some of the additional delays are the result of NYCHA's decision to expand user training on the new system. The Monitors agree that additional training is necessary and should be detailed and applied to all users. The Monitors will work with NYCHA to minimize additional delays on this project.</p>

Procurement			
ID	Project	NYCHA Status	Monitors' Comments
5.1	Transform Procurement Structure - Restructuring within the Procurement department.	Complete; project to be formally closed	<p>NYCHA's Procurement department completed the restructuring effort defined in the Transformation Plan, including creation of the new Procurement Logistics and Inventory (PLI) department.</p> <p>NYCHA has begun proactively monitoring vendor responsibilities, but still lacks an up-to-date and integrated technological system for evaluating and monitoring vendor performance, and incorporating feedback from NYCHA staff who observe vendors' work at the property level.</p> <p>Separately, NYCHA has improved coordination between skilled-trades personnel and the procurement department with the aim of identifying and addressing deficiencies in products NYCHA receives and delays in procurement. Moreover, as of December 2024, Neighborhood Contract Managers ("NCMs") have been hired for each neighborhood; their initial goal is to oversee implementation of improvements to the micro-purchasing process,</p>

			and the role’s scope may be expanded in the future.
5.2	Improve Processes - Enhance efficiency and accountability in procurement processes.	In progress	<p>NYCHA has made process improvements, including introducing a vendor screening tool and cleaning up catalogue numbers to improve parts- and equipment-inventory and ordering.</p> <p>The Monitors are working with NYCHA to improve vendor evaluation processes, including assessing how more feedback from the department-level users can be incorporated into vendor evaluations.</p>
5.3	Expand Staff Capabilities - Roll out ethics, Section 3, and M/WBE training for staff.	Complete; project to be formally closed	NYCHA has implemented ethics training for developments, and training on Section 3 and M/WBE policy across the agency. The Monitors are still assessing the effectiveness of Procurement trainings.
5.4	Broaden and Improve NYCHA's Vendor Pool - Increase vendor resources and create a portfolio of Pre-Qualified Lists ("PQLs").	Complete; project to be formally closed	NYCHA has created PQLs—lists of vendors who satisfy all the requirements to do business with NYCHA—and begun providing support to vendors who need assistance meeting these requirements with the aim of broadening the pool of high-quality vendors available to NYCHA. The Monitors are evaluating NYCHA’s use of the PQLs

M/WBE: Various New York City, New York State, and HUD programs seek to ensure that certified minority- and woman-owned business enterprises (M/WBEs) receive fair consideration and opportunities to bid on government-funded projects.

			and their effect on vendor performance generally.
5.5	<p>Implement Enabling Technology - Identify and implement appropriate technology.</p>	In progress	<p>This initiative has commenced but cannot be assessed at this time.</p> <p>NYCHA is in the process of implementing standard procedures for Vendor Name Checks and Vendor Performance Evaluations, both of which are designed to ensure that complete and accurate information about a vendor's performance and responsibility are available to NYCHA staff when contracting vendors. These projects are currently awaiting IT upgrades to be completed by the IT department.</p> <p>NYCHA should engage end users in the Performance Evaluation Standard Procedure, which could impact IT in the design of data capture and collection.</p>
5.6	<p>Source Procurements Strategically - Implement improved sourcing methods.</p>	In progress	<p>A list of vendors prequalified for micro-purchases has been established, but it is too soon to assess whether this reform has improved procurement beyond simply restricting micro-purchases to prequalified vendors. NYCHA should also develop a protocol for rescinding the prequalified status of underperforming</p>

			vendors and solicit feedback from Development-level staff to determine whether any workarounds are being used for non-qualified vendors.
--	--	--	--

**SECTION III:
THE MONITORS' BUDGET AND
ENGAGEMENT WITH STAKEHOLDERS**

This section describes the Monitors' budget for work on the monitorship and summarizes the Monitors' engagement with residents and other stakeholders since the Monitors' December 2024 Report.

A. Monitorship Budget

The HUD Agreement requires the Monitors to prepare an annual budget for the monitorship, including staff, expert consultants, or other third-party contractors engaged by the Monitors. HUD, SDNY, and the City approved the Monitors' budget for Year 6, and the City is required to pay the costs of the monitorship as set out in the approved budget. This subsection describes the Monitors' approved budget for Year 6, including how it was allocated for various areas of work and how it was allocated among the Monitors' team. Once approved, the Monitors will similarly describe their Year 7 budget.

The monitorship is comprised of nine workstreams focusing on NYCHA's obligations under the HUD Agreement related to heat, elevators, pests and waste, lead, mold, inspections, capital projects, and organizational change, as well as the Monitors' stakeholder engagement work. For the period covering February 28, 2024, to February 27, 2025, the total approved budget for the monitorship was \$18,954,717. Those funds were allocated among the various monitorship areas, as follows:²³¹

- **Heat:** This component of the monitorship focuses on NYCHA's compliance with its heat-related obligations under the HUD Agreement. The Year 6 budget allocated \$1,953,539 to this work.
- **Elevators:** This component of the monitorship focuses on NYCHA's compliance with its elevator-related obligations under the HUD Agreement. The Year 6 budget allocated \$1,988,594 to this work.
- **Pests and Waste:** This component of the monitorship focuses on NYCHA's compliance with its pests and waste management obligations under the HUD Agreement. The Year 6 budget allocated \$1,264,553 to this work.
- **Lead-Based Paint:** This component of the monitorship focuses on NYCHA's compliance with its lead-based

paint-related obligations under the HUD Agreement. The Year 6 budget allocated \$1,264,553 to this work.

- **Mold:** This component of the monitorship focuses on NYCHA's compliance with its mold-related obligations under the HUD Agreement. The Year 6 budget allocates \$1,878,333 to this work.
- **Inspections:** This component of the monitorship focuses on NYCHA's compliance with its inspection-related obligations. The Year 6 budget allocated \$2,916,770 to this work.
- **Capital Projects:** This component of the monitorship focuses on NYCHA's compliance with its obligation to provide systemic and long-lasting improvements to residents' quality of life through capital projects, including replacing outdated heating systems, elevators, and plumbing infrastructure, installing measures to combat pest infestations, and improving waste management systems. The Year 6 budget allocated \$2,083,974 to this work.
- **Organizational Change:** This component of the monitorship focuses on NYCHA's compliance with its obligations to change its management, organizational, and workforce structure in a manner that will ensure sustained compliance with the HUD Agreement's other requirements. The Year 6 budget allocated \$4,837,602 to this work.
- **Stakeholder Engagement:** This component of the monitorship focuses on communication and engagement with residents and external stakeholders, including members of the public, SDNY,, HUD, the City, as well as the means through which residents and stakeholders can report issues to the Monitors. The Year 6 budget allocated \$545,134 to this work.

Additional detail on the work of each of these teams is contained in the preceding pages of this report, as well as the Monitors' previous reports, available on the monitorship website.

The budget for each workstream was allocated among the various members of the monitorship team. The monitorship is comprised of co-monitors Neil Barofsky and Matthew Cipolla, Jenner & Block LLP attorneys and staff, Turner & Townsend Inc. employees, Quadel employees, FTI Consulting, Inc. employees, and an individual consultant. The approved budget noted above was allocated between these groups as follows:

- **Jenner & Block LLP ("Jenner"):** The Monitors are partners at Jenner, a law firm with offices in New York, other U.S. cities, and the United Kingdom. The Monitors and eight (8) other Jenner partners lead the monitorship. The Monitors and all Jenner partners are contributing their time pro bono. Jenner also has, as of the date of this report, eighteen (18) associates as well as one (1) paralegal and one (1) legal assistant, providing services to the monitorship. Calculated based on hourly billing rates, the value of associate and staff time provided to the monitorship was approximately \$13.2 million in Year 6, in addition to the value of donated partner time of approximately \$7.5 million. Under the terms of the Monitors' agreement, the Monitors agreed to limit the amount billed to the City for associate and staff time to \$6 million. The remaining \$14.7 million of legal services that Jenner provided to NYHCA was donated by the firm.
- **Turner & Townsend Inc. ("T&T"):** T&T is global professional services company specializing in program management, project management, and cost management consulting within the property and real estate sector. The Year 6 budget allocated \$7,892,064.28 for the work of T&T. T&T bills its fees on an hourly basis for the work of its staff, which as of the date of this report included eighteen (18) full-time employees and ten (10) half-time employees. The budget also allocated \$30,000 for T&T's expenses, such as travel, and \$101,735 for software licenses and data hosting fees.
- **Quadel Consulting & Training, LLC ("Quadel"):** Quadel is an affordable housing consultancy trained and certified in HUD regulations, compliance, and

housing authority operations. Quadel also specializes in inspection standards, local building codes, lead remediation, and pest and waste management. The Year 6 budget allocated \$4,591,988.60 for Quadel's work, which included labor and associated expenses. Quadel bills its fees on an hourly basis for the work of its staff, which as of the date of this report included the equivalent of nine (9) full-time employees, based on the total number of hours worked. The budget also allocated \$183,356.11 for Quadel's expenses, such as travel and software licenses.

- **Individual Consultant:** The monitorship also employs an individual consultant, who works closely with the Monitors' team of attorneys, Turner & Townsend, and the various NYCHA departments responsible for providing services in the areas of heating system management, elevator services and maintenance, lead remediation, mold remediation, pest & waste management, and capital projects. The consultant further supports the Monitors' stakeholder engagement efforts, assisting with unresolved repair complaints by coordinating with NYCHA's various departments responsible for handling repairs. The Year 6 budget allocated \$250,000 for the work of this individual, who bills on an hourly basis.
- **FTI Consulting, Inc ("FTI"):** FTI is a business consulting firm. FTI's Construction, Projects, & Assets, and Data & Analytics advisory practices are assisting the monitorship by assessing NYCHA's capital expenditure and project management processes. In Year 6 of the monitorship, FTI has performed this work on a pro bono basis, for which the Monitors are extremely grateful.

B. Stakeholder Engagement

Since the Monitors' December 2024 Report, the Monitors have continued to engage with residents and other stakeholders, including but not limited to, the following activities:

- A meeting of the Community Advisory Committee ("CAC");

- A development visit to Andrew Jackson Houses/Morrisania Air Rights Houses in the Bronx;
- Monitoring and inspections visits at 41 developments;
- Other direct engagement with tenant association leadership;
- Responses to over 300 phone calls and emails received from residents through the Monitors' email and phone lines; and
- Regular engagement with SDNY and HUD.

The Monitors encourage suggestions for improvement in stakeholder engagement. For example, in response to resident feedback in 2024, the Monitors are working on a system for more regular meetings with resident leaders in 2025, and the Monitors plan to expand CAC membership later this year. The Monitors will continue to look for additional ways to engage with residents and obtain their feedback.

ENDNOTES FOR SECTION I: PROPERTY MANAGEMENT

¹ Agreement between the U.S. Department of Housing and Urban Development (“HUD”), the New York City Housing Authority (“NYCHA”), and New York City (“the City”) Ex. B ¶¶ 2(a)-(b), 3-5, 6-7, 9(a), 9(c), 10(a)-(b), 13(a)-(c), 14(c), Jan. 31, 2019 (hereinafter the “HUD Agreement” or “Agreement”).

² *Id.* ¶ 14(c).

³ *Id.* ¶¶ 1, 2(a); N.Y.C. Admin. Code § 27-2029(a).

⁴ Agreement, Ex. B ¶ 2(a)-(b).

⁵ *Id.*

⁶ *Id.* ¶ 2(a).

⁷ Monitors’ Report, Aug. 21, 2024, at 64.

⁸ National Weather Service, *What Are Heating and Cooling Degree Days*, https://www.weather.gov/key/climate_heat_cool; New York State Energy Research and Development Authority, Heating Degree Day Information (Mar. 13, 2025), <https://www.nyserda.ny.gov/About/Publications/Energy-Analysis-Reports-and-Studies/Weather-Data/Heating-Degree-Day-Information>; U.S. Environmental Protection Agency, *Climate Change Indicators: Heating and Cooling Degree Days* (June 2024), <https://www.epa.gov/climate-indicators/climate-change-indicators-heating-and-cooling-degree-days>; U.S. Global Research Program, *Heating and Cooling Degree Days*, <https://tinyurl.com/49ty99b7>.

⁹ The Monitors source outside temperature data from Weather Underground.

¹⁰ NYCHA disputes the relevance of HDDs to assess the performance of heating systems, and asserts that HDDs are only used to calculate energy consumption and forecast future fuel supply needs.

¹¹ Agreement, Ex. B ¶ 9(a).

¹² *Id.* ¶ 10(a).

¹³ *Id.* ¶¶ 9(a), 10(a).

¹⁴ *Id.* ¶ 9(a).

¹⁵ *Id.* ¶ 10(a).

¹⁶ *Id.*

¹⁷ *Id.* ¶¶ 9(c), 10(b).

¹⁸ Monitors’ Report, Aug. 21, 2024, at 59.

¹⁹ Agreement, Ex. B ¶ 7.

²⁰ *Id.*

²¹ NYCHA, Heating Action Plan, Dec. 4, 2019, at 33; Agreement, Ex. B ¶ 7.

²² *Id.* ¶¶ 4-5.

²³ Monitors’ Report, Dec. 19, 2024, at 20.

²⁴ Agreement, Ex. B ¶¶ 24(a), 27, 28, 29(a)(i), 29(a)(ii).

²⁵ *Id.* ¶¶ 24(b), 28, 29(b)(iii), 29(b)(iv).

²⁶ *Id.* ¶¶ 32, 33.

²⁷ *Id.* ¶ 34(b).

²⁸ *Id.* ¶ 31.

²⁹ *Id.* ¶ 34(a).

³⁰ Monitors’ Report, Dec. 19, 2024, at 37-38.

³¹ Agreement, Ex. B ¶ 34(b).

³² *Id.*

³³ Given prior challenges and delays with the installation of new elevators, the First Monitor, HUD, and SDNY set an interim target of replacing 80 elevators in 2024. NYCHA met this interim goal in 2024. Agreement, Ex. B ¶ 34(b).

³⁴ Agreement, Ex. B ¶ 34(b).

³⁵ *Id.*

³⁶ There are fewer elevator banks with multiple elevators in this report as compared to the previous report, Monitors' Report, Dec. 19, 2024, at 33, because when elevators are transferred to a third party through the PACT program, as described in **Section I.2.A**, the elevators are no longer included in measuring performance for an obligation. This change is made retroactive, so those elevators currently serviced by NYCHA are compared across the years. Accordingly, measures of performance indicated in previous reports may vary slightly based on the retroactive exclusion of these transferred elevators.

³⁷ Agreement, Ex. B ¶ 24(a). Beginning in Year 3, the HUD Agreement required NYCHA to ensure that at least 70% of elevator banks with more than one elevator have no more than one instance per year where all elevators are out of service. *Id.* ¶ 23(a). Beginning in Year 5, this requirement was superseded by the requirement that NYCHA ensure at least 85% of elevator banks with more than one elevator have no more than one instance per year where all elevators are out of service. *Id.* ¶ 24(a).

³⁸ As discussed in the Monitors' December 2024 Report, NYCHA and the Monitors agreed to consolidate data for preventive maintenance and other planned outages. Monitors' Report, Dec. 19, 2024, at 39. Accordingly, the Monitors updated their data to include preventive maintenance for those obligations that apply to planned outages. Because this obligation includes planned outages, the inclusion of preventive maintenance has resulted in a slight decrease in compliance across all years because, on certain occasions, NYCHA will be performing preventive maintenance on an elevator in a multi-elevator bank when the other elevators are out of service. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 31% in Year 5, *id.* at 34, while its performance after updating the data was found to be 30% in Year 5.

³⁹ Agreement, Ex. B ¶¶ 23(a), 24(a). Unlike related obligations, this requirement was not superseded.

⁴⁰ As discussed in the Monitors' December 2024 Report, NYCHA and the Monitors agreed to consolidate data for preventive maintenance and other planned outages. Monitors' Report, Dec. 19, 2024, at 39. Accordingly, the Monitors updated their data to include preventive maintenance for those obligations that apply to planned outages. Because this obligation includes planned outages, the inclusion of preventive maintenance has resulted in a slight decrease in compliance across all years because, on certain occasions, NYCHA will be performing preventive maintenance on an elevator in a multi-elevator bank when the other elevators are out of service. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 63% in Year 5, *id.* at 35, while its performance after updating the data was found to be 62% in Year 5.

⁴¹ By the end of Year 1, the Agreement required NYCHA to resolve 75% of no-service conditions within eighteen hours of learning of them. Agreement, Ex. B ¶ 28. Beginning in Year 5, this requirement was superseded by the requirements that NYCHA resolve at least 85% of no-service conditions within four hours of learning of them and 100% of no-service conditions within twelve hours. *Id.* ¶¶ 29(a)(i), 29(a)(ii); Monitors' Report, Dec. 19, 2024, at 35.

⁴² Agreement, Ex. B ¶ 29(a)(i).

⁴³ Prior to this report, NYCHA and the Monitors included planned and unplanned outages in measuring performance for this obligation. However, the parties agreed that performance for

this obligation should only include unplanned outages. Because this obligation included planned outages, the exclusion of planned outages has resulted in a slight increase in compliance across all years because NYCHA's planned outages rarely result in no-service conditions longer than four hours. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 70% in Year 5, Monitors' Report, Dec. 19, 2024, at 36, while its performance after updating the data was found to be 71% in Year 5.

⁴⁴ Agreement, Ex. B ¶ 29(a)(ii).

⁴⁵ There are two other exceptions that NYCHA does not avail itself of: NYCHA does not track whether a no-service condition falls under an exception because it had an industry-accepted repair time of longer than twelve hours or because a part was unavailable. Accordingly, the Monitors' assessment of NYCHA's performance under this obligation may include such outages. Monitors' Report, Dec. 19, 2024, at 36-37.

⁴⁶ As discussed in the Monitors' December 2024 Report, NYCHA and the Monitors agreed to consolidate data for preventive maintenance and other planned outages. *Id.* at 39.

Accordingly, the Monitors updated their data to include preventive maintenance for those obligations that apply to planned outages. Because this obligation includes planned outages, the inclusion of preventive maintenance has resulted in an increase in compliance across all years because NYCHA rarely performs preventive maintenance longer than twelve hours. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 97% in Year 5, *id.* at 37, while its performance after updating the data was found to be 99% in Year 5.

⁴⁷ Agreement, Ex. B ¶ 27; Monitors' Report, Aug. 21, 2024, at 253 n.246 (citing HUD and U.S. Attorneys' Office for the Southern District of New York, Letter to NYCHA and the First Monitor, July 29, 2022, at 2).

⁴⁸ Agreement, Ex. B ¶ 27.

⁴⁹ *Id.* ¶ 32.

⁵⁰ Monitors' Report, Dec. 19, 2024, at 38-39.

⁵¹ *Id.*

⁵² N.Y.C. Admin. Code § 28-304.7 ("The owner of all new and existing passenger elevators, freight elevators, and escalators shall have a contract with an approved elevator agency to perform elevator and escalator maintenance, repair and replacement work as defined by ASME A17.1 as modified by chapter K1 of appendix K of the New York city building code. The name, address and telephone number of such agency shall be maintained at each premises, on the mainline disconnect switch and in a location readily accessible to employees of the department and to maintenance and custodial staff at the premises.").

⁵³ Performance calculations begin in Year 4 because the rules for planned outages that result in a no-service condition changed at that time. Before January 31, 2022, NYCHA was prohibited from scheduling these outages between 6 a.m. and 10 a.m. and between 3 p.m. and 8 p.m., except for elevator rehabilitation, replacement, or regulatory mandates. In Year 4, these restricted periods were shortened by one hour—to 6 a.m. to 9 a.m. in the morning and 4 p.m. to 8 p.m. in the evening. See HUD and U.S. Attorneys' Office for the Southern District of New York, Letter to NYCHA and the First Monitor, July 29, 2022, at 2. Due to this change, data from earlier years is not directly comparable to Year 4 and beyond.

⁵⁴ Additional details regarding NYCHA's challenges in scheduling and providing notice for preventive maintenance are discussed in the Monitors' Report, Dec. 19, 2024, at 39-40.

⁵⁵ Agreement, Ex. B ¶ 24(b). Beginning in Year 3, the HUD Agreement required NYCHA to ensure that at least 70% of elevator cars have no more than eight unplanned outages per year.

Id. ¶ 23(b). Beginning in Year 5, this requirement was superseded by the requirement that NYCHA ensure at least 85% of elevator cars have no more than eight unplanned outages per year. *Id.* ¶ 24(b).

⁵⁶ *Id.* Beginning in Year 3, the HUD Agreement required NYCHA to ensure that no elevator cars have more than fifteen unplanned outages per year. *Id.* ¶ 23(b). Beginning in Year 5, this requirement was superseded by the requirement that NYCHA ensure that no elevator cars have more than twelve unplanned outages per year. *Id.* ¶ 24(b).

⁵⁷ *Id.* ¶ 28.

⁵⁸ Monitors' Report, Aug. 21, 2024, at 87-88.

⁵⁹ Prior to this report, NYCHA and the Monitors included planned and unplanned outages in measuring NYCHA's response time. However, the parties agreed that performance for this obligation should only include unplanned outages. Because this obligation included planned outages, the exclusion of planned outages has resulted in a slight change in average duration across Years 4 and 5. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 10.8 in Year 4 and 7.4 in Year 5, Monitors' Report, Dec. 19, 2024, at 44, while its performance after updating the data was found to be 11.0 in Year 4 and 7.3 in Year 5. This slight change indicates that, in Year 4, NYCHA's planned outages, which did not include preventive maintenance at the time, were on average quicker than its unplanned outages, while in Year 5, NYCHA's planned outages, which still did not include preventive maintenance, were on average longer than its unplanned outages.

⁶⁰ NYCHA's elevator operations consist of two units of mechanics, field teams and special teams. Field teams are the first to respond to service outages and provide most of the repairs across NYCHA developments. Special teams consist of highly specialized elevator mechanics who are deployed when field teams are unable to complete repairs. NYCHA's special teams reported that the refresher course improved the quality of repairs completed by the field teams, which has allowed special teams to focus on more complex issues that cause service outages.

⁶¹ Agreement, Ex. B ¶ 29(b)(iii).

⁶² Prior to this report, NYCHA and the Monitors included planned and unplanned outages in measuring performance for this obligation. However, NYCHA and the Monitors agreed that performance for this obligation should only include unplanned outages. Because this obligation included planned outages, the exclusion of planned outages has resulted in a slight decrease in compliance across all years because NYCHA rarely performs a planned outage for longer than ten hours. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 73% in Year 4, Monitors' Report, Dec. 19, 2024, at 45, while its performance after updating the data was found to be 72% in Year 4. Notably, there was no change in performance indicated by the Monitors' December 2024 Report and found in this report on this obligation for Years 1 and 5.

⁶³ Agreement, Ex. B ¶ 29(b)(iv).

⁶⁴ There is one other exception that NYCHA does not avail itself of: NYCHA does not track whether an elevator car outage falls under an exception because it has an industry-accepted repair time of longer than eighteen hours. Accordingly, the Monitors' assessment of NYCHA's performance under this obligation may include such outages. Monitors' Report, Dec. 19, 2024, at 45.

⁶⁵ As discussed in the Monitors' December 2024 Report, NYCHA and the Monitors agreed to consolidate data for preventive maintenance and other planned outages. *Id.* at 39. Accordingly, the Monitors updated their data to include preventive maintenance for those obligations that apply to planned outages. Because this obligation includes planned outages,

the inclusion of preventive maintenance has resulted in an increase in compliance across all years because NYCHA rarely performs preventive maintenance longer than eighteen hours. For example, in the Monitors' December 2024 Report, NYCHA's performance on this obligation was indicated as 92% in Year 5, *id.* at 46, while its performance after updating the data was found to be 97% in Year 5.

⁶⁶ Agreement, Ex. B ¶ 31.

⁶⁷ *Id.* ¶¶ 35-37.

⁶⁸ *Id.* ¶¶ 38-39.

⁶⁹ *Id.* ¶¶ 41, 43-44.

⁷⁰ *Id.* ¶¶ 45-46.

⁷¹ *Id.* ¶ 46.

⁷² *Id.* ¶ 35.

⁷³ *Id.*

⁷⁴ For instance, the undercount multiplier is reduced based on work orders that NYCHA generates to address pest infestations it discovers through preventative activities, including building sweeps and general IPM inspections.

⁷⁵ Agreement, Ex. B ¶ 35.

⁷⁶ *Id.* ¶ 36. Based on the expertise and experience of the consulting urban entomologists, the Monitors determined that the bed bug population should also be reduced by 40% by the end of Year 3.

⁷⁷ *Id.* ¶ 37.

⁷⁸ *Id.* ¶¶ 38-39. As discussed in the Monitors' August 2024 Report, the Monitors and other parties agreed that, under the best reading of the HUD Agreement, the response-time requirements apply only to resident pest complaints in apartments (rather than in both apartment and common areas). Monitors' Report, Aug. 21, 2024, at 104.

⁷⁹ Monitors' Report, Dec. 19, 2024, at 58-59.

⁸⁰ Agreement, Ex. B ¶ 39(a).

⁸¹ *Id.* ¶ 39(b).

⁸² *Id.* ¶ 38(d).

⁸³ *Id.* ¶¶ 43-44.

⁸⁴ *Id.*

⁸⁵ Monitors' Report, Aug. 21, 2024, at 111-12; Monitors' Report, Dec. 19, 2024, at 63-65.

⁸⁶ Agreement, Ex. B ¶ 38(c).

⁸⁷ Monitors' Report, Aug. 21, 2024, at 112-13.

⁸⁸ Agreement, Ex. B ¶¶ 43-44.

⁸⁹ See SP 040:49:6, Pest Prevention and Control in NYCHA Residential Buildings, at 49, 67, 68.

⁹⁰ Monitors' Report, Aug. 21, 2024, at 110; Monitors' Report, Dec. 19, 2024, at 66.

⁹¹ Monitors' Report, Aug. 21, 2024, at 110; Monitors' Report, Dec. 19, 2024, at 66.

⁹² Monitors' Report, Aug. 21, 2024, at 110; Monitors' Report, Dec. 19, 2024, at 66.

⁹³ Agreement, Ex. B ¶ 45.

⁹⁴ *Id.*

⁹⁵ NYCHA, City Capital Action Plan, May 8, 2021, at 18.

⁹⁶ *Id.*

⁹⁷ Monitors' Report, Dec. 19, 2024, at 68.

⁹⁸ *Id.*

⁹⁹ The HUD Agreement also required NYCHA to install 8,000 door sweeps, Agreement, Ex. B ¶ 46(a), which the First Monitor determined that NYCHA completed in February 2022, and ten

exterior bulk crushers, which NYCHA completed in December 2022. Monitors' Report, Aug. 21, 2024, at 104.

¹⁰⁰ Monitors' Report, Dec. 19, 2024, at 70; NYCHA, City Capital Action Plan, May 8, 2021, at 17.

¹⁰¹ After consulting with the urban entomologists, the Monitors determined that the bed bug population should also be reduced by 40% by the end of Year 3.

¹⁰² Monitors' Report, Dec. 19, 2024, at 79; Agreement, Ex. B ¶¶ 15, 17, 19.

¹⁰³ Agreement, Ex. B ¶ 20.

¹⁰⁴ A "Year" covers the period from February 1 of one year to January 31 of the next year. For example, Year 6 is the period from February 1, 2024, to January 31, 2025.

¹⁰⁵ Statistics for the backlog of mold and leak work orders are calculated pursuant to the *Baez* Consent Decree, which imposes similar, but not identical, requirements to the HUD Agreement.

¹⁰⁶ NYCHA maintains that it is important to consider all mold and leak enhancements enacted since the outset of the monitorship, as these enhancements demonstrate NYCHA's continued commitment to improvement. These enhancements, which have focused on preventing mold growth and recurrence, are briefly discussed here. Among other things, NYCHA has initiated an authority-wide ventilation improvement program. As part of this effort, NYCHA has replaced over 6,000 roof fans, which, in turn, has decreased sustained moisture in apartments, a major root cause of mold. NYCHA has also cleaned over 72,500 in-apartment vents, improving air circulation and air quality. Additionally, NYCHA has developed, in collaboration with the Independent Data Analyst ("IDA"), the Mold & Leak Scorecard, which ranks NYCHA's developments from best to worst performing based on the developments' performance across mold and leak metrics. This tool has enabled NYCHA to identify poorly performing developments and to direct supplemental resources and support to developments based on need. For a more detailed account of NYCHA's enhancements since the outset of the monitorship, see Monitors' Report, Aug. 21, 2024, at 130-34.

¹⁰⁷ Monitors' Report, Dec. 19, 2024, at 80.

¹⁰⁸ NYCHA, City Capital Action Plan Monthly Update, Feb. 20, 2025, at 4; Monitors' Monthly Meeting with A&CM on the City Capital Action Plan, Feb. 20, 2025.

¹⁰⁹ Monitors' Meeting with OMAR on the BLI Program, Feb. 21, 2024.

¹¹⁰ Agreement, Ex. B ¶ 17(a)-(c).

¹¹¹ *Id.* ¶ 17(b).

¹¹² *Id.*

¹¹³ According to NYCHA, it developed these restrictions to comply with the HUD Agreement requirement that prohibits NYCHA from closing "mold, flood, or 'leak from above' work orders as 'Resident Not Home,'" *id.* ¶ 19, and additional *Baez* obligations.

¹¹⁴ *Id.* ¶ 17(b).

¹¹⁵ *Id.*

¹¹⁶ *Id.* NYCHA notes that simple repairs make up a small percentage of the total mold and leak work order universe. NYCHA also notes that NYCHA's Year 1 percentage is an outlier. It attributes its Year 1 performance to the fact that the mold inspection training was not rolled out until the end of the year.

¹¹⁷ NYCHA attributes the growth of the mold and leak work order backlog, in part, to NYCHA residents missing appointments or refusing painters entry. NYCHA states that such work orders then cannot be closed because all work orders must be completed before the work is considered complete under the HUD Agreement, leading to repeated attempts by NYCHA staff.

¹¹⁸ Statistics for the backlog of mold and leak work orders are calculated pursuant to the *Baez Consent Decree*, which imposes similar, but not identical, requirements to the HUD Agreement.

¹¹⁹ NYCHA, 2023 Report on NYCHA's Mold and Leak Response Efforts: Progress, Challenges and Next Steps, at 32.

¹²⁰ *Agreement*, Ex. B ¶ 17(a).

¹²¹ NYCHA, Business Rules for Exhibit B Metrics, Sept. 30, 2021, at 3.

¹²² *Agreement*, Ex. B ¶ 17(c).

¹²³ *Id.*

¹²⁴ Monitors' Report, Dec. 19, 2024, at 87-88.

¹²⁵ *Id.* at 88.

¹²⁶ *Id.*

¹²⁷ *Id.*

¹²⁸ *Id.* The reimagined Leak SP workflow will not, however, permit the automatic generation of child work orders following leak inspections.

¹²⁹ *Agreement*, Ex. B ¶ 15(a)-(c).

¹³⁰ *Id.* ¶ 15(a).

¹³¹ This requirement is a "rolling" measurement of what percentage of verified mold complaints do not have a subsequent verified mold complaint in the same apartment, common area room, or hallway within the following 12 months (the "Recurring Complaints"). For example, as of the end of Year 5, 86% of verified mold complaints did not have Recurring Complaints. This means that from February 1, 2024, to and including January 31, 2025, 86% of verified mold complaints did not have Recurring Complaints.

¹³² *Agreement*, Ex. B ¶ 15(b).

¹³³ *Id.* ¶ 15(c).

¹³⁴ This requirement is a "rolling" measurement of how many apartments have had more than three verified mold complaints within the last 12 months. For example, as of the end of Year 5, there were 51 such apartments. That means that from February 1, 2024, to and including January 31, 2025, 51 apartments had more than three verified mold complaints within the last 12 months.

¹³⁵ Monitors' Report, Dec. 19, 2024, at 93-95.

¹³⁶ *Id.*

¹³⁷ Monitors' Meeting with OMAR, Feb. 11, 2025.

¹³⁸ NYCHA notes that the mold inspector trainings contain a knowledge check that is reviewed but ungraded.

¹³⁹ Monitors' Report, Dec. 19, 2024, at 93-94.

¹⁴⁰ *Id.* at 95-99.

¹⁴¹ *Id.* at 96.

¹⁴² *Id.*

¹⁴³ *Id.* at 98.

¹⁴⁴ NYCHA, City Capital Action Plan Quarterly Report, Jan. 17, 2025, at 7.

¹⁴⁵ Monitors' Monthly Meeting with A&CM on the City Capital Action Plan, Feb. 20, 2025.

¹⁴⁶ *Id.*

¹⁴⁷ A&CM, Email titled "Comp Mod and Waste Line Updates for Monitors' Next Report," Feb. 12, 2025.

¹⁴⁸ *Id.*

¹⁴⁹ Monitors' Monthly Meeting with A&CM on the City Capital Action Plan, Feb. 20, 2025.

¹⁵⁰ NYCHA, City Capital Action Plan Quarterly Report, Jan. 17, 2025, at 6.

¹⁵¹ A&CM, Email titled "Comp Mod and Waste Line Updates for Monitors' Next Report," Feb. 12, 2025.

¹⁵² NYCHA, City Capital Action Plan Quarterly Report, Jan. 17, 2025, at 6; A&CM, Email titled "Comp Mod and Waste Line Updates for Monitors' Next Report," Feb. 12, 2025.

¹⁵³ Monitors' Report, Dec. 19, 2024, at 96.

¹⁵⁴ NYCHA, PowerPoint titled "Building Line Initiative Healthy Homes," Feb. 2025.

¹⁵⁵ *Id.*

¹⁵⁶ Monitors' Meeting with OMAR on BLI program, Feb. 21, 2025.

¹⁵⁷ *Id.*

¹⁵⁸ *Id.*

¹⁵⁹ Agreement, Ex. B ¶ 20.

¹⁶⁰ Monitors' Report, Dec. 19, 2024, at 99.

¹⁶¹ Monitors' Report, Aug. 21, 2024, at 152-53.

¹⁶² Agreement, Ex. A ¶¶ 8-12.

¹⁶³ All of the lead data referenced in this section is NYCHA's self-reported data; it has not yet been independently validated by the Monitors, who are in the process of working towards independent validation of the data. Further, certain of the lead data included in this section excludes the final few of days in January 2025 because, due to personnel scheduling, NYCHA generated a number of its data reports several days prior to January 31, 2025. Despite this discrepancy, this report refers to the Year 6 data herein as current "upon the close of Year 6."

¹⁶⁴ Monitors' Report, Dec. 19, 2024, at 105.

¹⁶⁵ Agreement, Ex. A ¶¶ 9-11.

¹⁶⁶ Monitors' Report, Aug. 21, 2024, at 156.

¹⁶⁷ Phase One prioritized CU6 Apartments, in addition to apartments meeting other criteria. Not all Phase One apartments were successfully accessed to conduct testing; NYCHA will continue to attempt the untested Phase One apartments as it proceeds with Phase Two testing.

¹⁶⁸ Monitors' Report, Dec. 19, 2024, at 107.

¹⁶⁹ Apartments classified as "off rent roll" are apartments approved as offline by HUD, but which may be used for another purpose such as for employee office space. NYCHA tracks these apartments but does not proactively attempt to test them.

¹⁷⁰ Note that the total universe of apartments containing lead-based paint will continue to grow as NYCHA continues to conduct XRF testing.

¹⁷¹ NYCHA's ultimate progress toward meeting this obligation will be dependent on the number of apartments that NYCHA identifies as needing abatement in its remaining XRF testing. *Id.* at 108.

¹⁷² *Id.* at 109.

¹⁷³ Agreement, Ex. A ¶¶ 23, 25-26; Monitors' Report, Aug. 21, 2024, at 164.

¹⁷⁴ Monitors' Report, Aug. 21, 2024, at 164.

¹⁷⁵ Agreement, Ex. A ¶¶ 23, 25.

¹⁷⁶ *Id.* ¶ 26. NYC Department of Health and Mental Hygiene ("DOHMH") identifies the EBLL in most cases. When this occurs, DOHMH will conduct the initial environmental investigation, rather than NYCHA, to determine the source of the lead exposure. NYCHA is not required to conduct a second investigation but typically will conduct a more comprehensive assessment as a proactive measure.

¹⁷⁷ *Id.*

¹⁷⁸ New York City, NYC Taking the Lead on Lead, Apr. 25, 2023, at 17

<https://www.nyc.gov/assets/leadfree/downloads/pdf/Taking-the-Lead-on-Lead-2023.pdf>.

¹⁷⁹ NYC Dept. of Health and Mental Hygiene, Order of the Commissioner to Abate Nuisance, Oct. 18, 2024.

¹⁸⁰ NYCHA, Letter to Brevoort Day Care Parents re EBLL, Oct. 18, 2024.

¹⁸¹ Airtek Environmental, LLC, XRF Testing Reports, Oct. 23, 2024.

¹⁸² NYCHA, Resident Notice of Lead-Based Paint Evaluation, Oct. 28, 2024.

¹⁸³ NYCHA, Letter to Brevoort Day Care Parents re EBLL Updates and Closure for Abatement, Nov. 4, 2024.

¹⁸⁴ NYC Dept. of Health and Mental Hygiene, Notification of Commencement of Lead Abatement/Remediation, Nov. 13, 2024.

¹⁸⁵ *Id.*; Airtek Environmental, LLC, Dust Wipe Testing Reports, Nov. 22, 2024; Airtek Environmental, LLC, Dust Wipe Testing Reports, Nov. 27, 2024; NYC Dept. of Health and Mental Hygiene, Compliance Inspection Clearance Letter, Nov. 29, 2024.

¹⁸⁶ NYCHA, Resident Notice of Lead-Based Hazard Reduction and Clearance Inspection, Dec. 2, 2024.

¹⁸⁷ Under the HUD Agreement, NYCHA is required to abate interior common areas on the same cadence as apartments. For exterior common areas, the Agreement merely specifies that NYCHA shall abate any exterior common areas with lead, prioritizing those areas posing the highest risk to children. Agreement, Ex. A ¶ 12.

¹⁸⁸ 24 C.F.R. § 35.1355(a)(2).

¹⁸⁹ NYCHA's Year 6 average reflects the average days to close paint remediation work orders created during Year 6. This average does not include any remediation work orders which are in the backlog, which NYCHA still maintains and has not yet closed out, or work orders created prior to Year 6.

¹⁹⁰ 24 CFR § 35.1355(b)(1).

¹⁹¹ *Id.*

¹⁹² *Id.*

¹⁹³ Agreement, Ex. A ¶ 8.

¹⁹⁴ NYCHA reported that it maintained pending appeals for 9% of developments as of the end of 2024. As detailed in **Section II.6.A** of the Monitors' August 2024 Report, NSPIRE rules allow NYCHA to submit documentation of recent lead-based paint evaluations or exemption evidence before an inspection; however, this process had not yet been incorporated into HUD's inspections in 2024. Since NYCHA was unable to submit this documentation before the inspection some units received score reductions for lead paint despite NYCHA reporting it had documentation confirming otherwise. Furthermore, in NSPIRE's first year, HUD conducted an additional quality assurance review to ensure score accuracy. As part of this review, HUD identified a data integrity issue that caused incorrect sample size selection for certain developments, leading to the rejection of some inspection scores. NYCHA stated that HUD has committed to reevaluating appeals for development scores affected by lead-based paint documentation or sample size issues.

¹⁹⁵ HUD's physical condition standards designate properties scoring under the administratively significant threshold of 30 points as failing and subject to referral to HUD's Department of Enforcement (DEC). NYCHA reported that the three developments that scored less than 30 points in 2024 are being closely monitored by HUD rather than referred to the DEC.

¹⁹⁶ Agreement ¶ 60. The parties agree that the superseding guidance requires NYCHA to comply with NSPIRE standards under this clause of Agreement ¶ 60.

¹⁹⁷ As detailed in **Section II.6.A** of the Monitors' August 2024 Report, NSPIRE rules allow NYCHA to submit documentation of recent lead-based paint evaluations or exemption evidence before an inspection; however, this process had not yet been incorporated into

HUD's inspections in 2024. Since NYCHA was unable to submit this documentation before the inspection some units received score reductions for lead paint despite NYCHA reporting it had documentation confirming otherwise. Furthermore, in NSPIRE's first year, HUD also conducted an additional quality assurance review to ensure score accuracy, and as part of this review, HUD identified a data integrity issue that led to an incorrect sample size being selected for certain developments, resulting in some inspection scores being rejected. NYCHA stated that HUD has committed to reevaluating appeals for developments affected by lead-based paint documentation or sample size issues.

¹⁹⁸ U.S. DEPT. OF HOUS. AND URB. DEV., NOTICE PIH: 2023-16/H 2023-07 8-9 (2023), available at

<https://www.hud.gov/sites/dfiles/OCHCO/documents/2023-16pihn.pdf>.

¹⁹⁹ U.S. DEPT. OF HOUS. AND URB. DEV., National Standards for the Physical Inspection of Real Estate and Associated Protocols, Scoring Notice, 88 Fed. Reg. 43371, 43372 (July 7, 2023) available at <https://www.govinfo.gov/content/pkg/FR-2023-07-07/pdf/2023-14362.pdf>.

²⁰⁰ *Id.*

²⁰¹ Agreement Ex. B ¶ 49.

²⁰² Monitors' Report, Aug. 21, 2024, at 209; NYCHA, Phase I Annual Inspection Action Plan, Dec 9, 2020.

²⁰³ Agreement Ex. B ¶ 47.

²⁰⁴ For example, at Wilson Houses in Manhattan, 20% of residents did not receive a scheduled inspection attempt after the development lost half of its maintenance staff due to transfers and retirements, leaving only two of four of their original maintenance staff for portions of the year. Similarly, at Morrisania Houses in the Bronx, a high volume of move-outs, lead and asbestos relocations, and a high incidence of leaks requiring dedicated attention from two workers at once, diverted resources away from annual inspections.

²⁰⁵ Agreement Ex. B ¶¶ 48-49.

²⁰⁶ The minor repairs list includes 15 main categories of items that should be repaired during an annual inspection: smoke and carbon monoxide detectors, entrance doors, closets, kitchen cabinets, electrical outlets, light switches, leaky sinks and stoppages, leaky faucets, window balances and latches, window guards, refrigerator repairs, handles and stove repairs, toilet repairs, bathtub and shower repairs, and reset breakers.

²⁰⁷ NYCHA, Annual Inspection Action Plan, Dec. 9, 2020, at 3 n.6.

²⁰⁸ The parties agree that superseding guidance requires NYCHA to comply with the NSPIRE standards under this clause of Agreement ¶ 60.

²⁰⁹ A standard performer is a housing agency that achieves an overall housing assessment score of at least 60 and at least 60% of the available points for the physical condition, financial condition, and management operations indicators, and a passing evaluation for the Capital Fund program indicator of HUD's public housing assessment system.

²¹⁰ Guidepost, Monitor's Final Report, Feb. 27, 2024, at 57.

ENDNOTES FOR SECTION II: ORGANIZATIONAL CHANGE

²¹¹ In March 2021, NYCHA first issued a plan titled “NYCHA’s Blueprint for Change: Transformation Plan,” which was supplemented in two follow-up plans in February 2022 and February 2023. These are collectively referred to in this report as the “Transformation Plan.”

²¹² See **Section III.C** of the Monitors’ August 2024 Report.

²¹³ *Id.*

²¹⁴ *Id.* at 224; see also Monitors’ Report, Dec. 19, 2024, at 168.

²¹⁵ Monitors’ Report, Aug. 21, 2024, at 224 (citing NYCHA, NYCHA’s Blueprint for Change: Transformation Plan, Mar. 2, 2021, at 26-28).

²¹⁶ Transformation Plan at 27 (stating that the Neighborhood Model would “unlock a more effective, localized service offering by moving more resources closer to the point of delivery,” including moving “[s]killed trade staff” to the Neighborhood, or even a subset of developments,” and stating that a “portion of the central office staff will move from our headquarters in Downtown Manhattan to the Neighborhood offices, providing a stronger link between Property Management and the support functions”).

²¹⁷ Monitors’ Report, Dec. 19, 2024, at 168-76.

²¹⁸ *Id.* at 154-55.

²¹⁹ *Id.* at 155-68.

²²⁰ *Id.* at 176-89.

²²¹ *Id.* at 182-89.

²²² Monitors’ Report, Aug. 21, 2024, at 235-36; Monitors’ Report, Dec. 19, 2024, at 170-73.

²²³ Monitors’ Report, Aug. 21, 2024, at 235-36.

²²⁴ Monitors’ Report, Dec. 19, 2024, at 172.

²²⁵ *Id.*

²²⁶ *Id.* at 171-73.

²²⁷ *Id.*

²²⁸ Guidepost, Monitor’s Final Report, Feb. 27, 2024, at 69; Monitors’ Report, Aug. 21, 2024, at 221.

²²⁹ However, NYCHA is now reporting a total of 350 “milestone activities,” because it has added new milestones

²³⁰ As of 2015, HUD has been prohibited from enforcing its physical needs assessment requirement. HUD, Physical Needs Assessment of Public Housing, Updated on Nov. 17, 2021, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/capfund/physical_assessment. However, NYCHA has recognized that HUD recommends a PNA every five years. NYCHA, Physical Needs Assessment FAQs, Accessed on Mar. 4, 2025.

<https://www.nyc.gov/site/nycha/about/physical-needs-assessment-faqs.page>.

ENDNOTES FOR SECTION III: THE MONITORS' BUDGET AND ENGAGEMENT WITH STAKEHOLDERS

²³¹ Among other tasks, the amounts for each workstream include reporting; project management; and data management and analysis. The amounts do not include incidental costs for related expenses such as software licenses and travel fees.

APPENDIX

Appendix A: List of Completed and In Compliance Requirements

The following table summarizes the completed and in compliance requirements of the HUD Agreement. Outstanding requirements of the HUD Agreement are described in **Section I** and **Section II** of this report.

Req. No.	Description	Status
Heat		
H2 (Ex. B ¶ 14(c))	Boiler Repairs or Replacement–PACT: 200 additional boilers will be addressed through PACT by December 31, 2026, and the developer selected will replace and repair boilers as needed.	Complete (Monitors’ Report, Aug. 21, 2024, at 54)
H3 (Ex. B ¶ 14(b))	BMS Modernization: NYCHA will modernize the Building Management Systems at 44 developments by December 31, 2019. Modernization will include introducing indoor temperature sensors.	Complete (Monitors’ Report, Aug. 21, 2024, at 62)
H10 (Ex. B ¶ 9(b))	Overall Heat Restoration (2019-2024): NYCHA will restore heat to affected apartments within (i) 24 hours for 85% of heating failures, and (ii) 48 hours for 100% of heating failures.	Superseded by H11 (Ex. B ¶ 10(a))
H12 (Ex. B ¶ 13(a), (c))	Notification to Tenants of Unplanned Heating Outage: Within two hours of learning of an unplanned heating outage, NYCHA will notify affected tenants by robocall and also post notifications in the affected building(s) and on NYCHA’s website, and also notify the Monitor.	In compliance (Monitors’ Report, Aug. 21, 2024, at 60-61)
H13 (Ex. B ¶ 13(b), (c))	Notification to Tenants of Planned Heating Outage: For planned heating outages, NYCHA will provide 48-hours advanced notice to affected tenants via robocall and also post notifications in the affected building(s) and on NYCHA’s website, and also notify the Monitor.	In compliance (Monitors’ Report, Aug. 21, 2024, at 60-61)
E3 (Ex. B ¶ 22)	Service Interruption: By May 31, 2019, NYCHA shall provide HUD and the Monitors with sufficient data to identify elevator service	Complete and In Compliance (Monitors’ Report,

	interruptions in the prior three years. This data shall be updated quarterly.	Aug. 21, 2024, at 91)
Elevators		
E4 (Ex. B ¶ 30)	Elevator Outage Monitoring: By July 31, 2019, NYCHA will institute and maintain a system that identifies every elevator outage and the start and end times of such outages.	Complete (Monitors' Report, Aug. 21, 2024, at 91)
E23 (Ex. B ¶ 34(a))	Buildings with One No-Service Condition: Beginning in Year 3, 70% of elevator banks with more than one elevator will have no more than one no-service condition.	Not met; no longer operative (Monitors' Report Aug. 21, 2024, at 96)
E23 (Ex. B ¶ 34(a))	Fifteen Unplanned Outages: Beginning in Year 3, no elevator shall have more than fifteen unplanned outages per year.	Not met; no longer operative (Monitors' Report Aug. 21, 2024, at 96)
E13 (Ex. B ¶ 28)	Reduction of Outage Time: In Year 1, NYCHA shall reduce the duration times of its elevator outages by 10%.	Complete (Monitors' Report, Aug. 21, 2024, at 87)
E23 (Ex. B ¶ 34(a))	Eighteen-Hour No-Service Conditions: Beginning in Year 1, 75% of no-service conditions shall be resolved within eighteen hours of the time NYCHA learns of them.	Complete; no longer operative (Monitors' Report Aug. 21, 2024, at 96)
E23 (Ex. B ¶ 34(a))	Caretaker Requirements: NYCHA will adopt and maintain an extended schedule for development caretakers to allow for cleaning of elevators as part of every shift.	In compliance (Monitors' Report, Aug. 21, 2024, at 76)
Pests & Waste		
P1 (Ex. B ¶ 46(a))	Door Sweeps: By March 31, 2020, NYCHA must install 8,000 door sweeps on basement doors with gaps.	Complete (Monitors' Report, Aug. 21, 2024, at 103)
P3 (Ex. B 46(c))	RMZ Support: NYCHA must dedicate 20 full-time exterminator staff to conduct ongoing comprehensive preventative maintenance	In Compliance (Monitors' Report, Aug. 21, 2024, at 103-04)

	treatments in public spaces for developments within the RMZ.	
P4 (Ex. B 46(d))	Bulk Crushers: By December 31, 2022, NYCHA must install exterior bulk crushers or retrofit exterior compactors with auger bulk crushers at ten developments.	Complete (Monitors' Report, Aug. 21, 2024, at 104)
P5 (Ex. B ¶ 38(d))	Pest Sensitive Units I: By January 31, 2021, develop an action plan that, among other things, establishes a procedure for informing residents of a process through which residents may notify NYCHA if anyone residing in an apartment has an applicable health condition.	Complete (Monitors' Report, Aug. 21, 2024, at 108)
P6 (Ex. B ¶ 41)	Targeted Relief for Pest Infestations: By July 31, 2019, for any apartment that has more than one pest infestation complaint within 12 months, NYCHA shall have a professional using IPM techniques evaluate the apartment, the immediately adjacent apartments, and common areas within 30 days to identify issues specific to the apartment that contributed to the recurrence. Within the following 30 days, NYCHA must address the issues using IPM techniques.	In Compliance (Monitors' Report, Aug. 21, 2024, at 102-03)
P12 (Ex. B ¶ 38(a))	Rat Response I: By January 31, 2021, NYCHA shall respond to (i) 75% of rat complaints within two business days and (ii) to all rat complaints within five calendar days.	Not met; no longer operative (i): 65% (ii): 75% (Monitors' Report, Aug. 21, 2024, at 105-06)
P6 (Ex. B ¶ 38(b))	Other Pest Response I: By January 31, 2021, NYCHA shall provide expedited response and application of pest control methods in cases where NYCHA is aware that a resident	Not met; no longer operative (i): 44% (ii): 51% (Monitors' Report, Dec. 19, 2024, at 60-61)
P17 (Ex. B ¶ 38(d))	Pest Sensitive Unit Response: By January 31, 2021, NYCHA shall provide expedited response and application of pest control methods in cases where NYCHA is aware that	In compliance (Monitors' Report, Aug. 21, 2024, at 108)

	a resident of the apartment has a condition generally recognized as being caused or exacerbated by exposure to pest infestations.	
Mold & Leaks		
M1 (Ex. B. ¶ 19)	Resident Not Home Mold Work Orders: NYCHA will not close any mold, flood, or leak from above work orders as "Resident Not Home."	In Compliance (Monitors' Report, Aug. 21, 2024, at 144)
Lead		
L1 (Ex. A ¶ 4(a))	Report Identifying Lead-Paint Developments and Apartments: NYCHA shall provide the United States with a report identifying all developments that were built prior to January 1, 1978, and are not exempt pursuant to 24 C.F.R. § 35.115, as a result of an inspection, an abatement, or otherwise, as well as any apartments in those developments that are not exempt ("lead-paint units").	Complete (Monitors' Report, Aug. 21, 2024, at 155-56)
L2 (Ex. A ¶ 4(b))	Report Identifying Lead-Paint Apartments with Children: NYCHA shall provide a report (the "Immediate Action List") identifying lead-paint units that NYCHA "had reason to believe are occupied or routinely visited by a child under the age of 6."	Complete (Monitors' Report, Aug. 21, 2024, at 155-56)
L3 (Ex. A ¶ 5(a))	Immediate Visual Assessments: Perform at least one visual assessment in accordance with 24 C.F.R. § 35.1355 of each apartment on the Immediate Action List, except insofar as the apartment received a compliant visual assessment within the preceding months.	Substantially Complete ¹ (Monitors' Report, Aug. 21, 2024, at 155-56)

¹ This obligation relates to apartments on the Immediate Action List. NYCHA completed 99% of the visual assessments required for the Immediate Action List. The outstanding visual assessments have been encompassed by NYCHA's broader CU6 efforts. Thus, the Monitors consider this obligation substantially complete and will not be tracking progress against it in future reports.

<p>L4 (Ex A ¶ 5(b))</p>	<p>Elimination of Lead-Based Paint Hazards: Eliminate any lead-based-paint hazards in apartments identified on the Immediate Action List using interim controls in accordance with 24 C.F.R. § 35.1330, or through abatement in accordance with 24 C.F.R. § 35.1325.</p>	<p>Substantially Complete² (Monitors' Report, Aug. 21, 2024, at 155-56)</p>
<p>L5 (Ex. A ¶ 6)</p>	<p>Exemption Documentation: Provide the United States with documents sufficient to show NYCHA's basis for claiming that particular developments are exempt.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 155-56)</p>
<p>L7 (Ex. A ¶ 19)</p>	<p>EBLL Risk Assessment: Within 30 days of appointment of the Prior Monitor, provide the Prior Monitor a list (the "EIBLL/EBLL-Triggered Risk Assessment List") of "all units, common areas servicing such units, and developments in which neither an environmental investigation nor a risk assessment was performed since the date of "the reporting to NYCHA (if on or after July 13, 2017) of a case of a child under age 6 with an EBLL, or the reporting to NYCHA (if before July 13, 2017) of a case of a child with an EBLL living in such apartment and development.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 164-65)</p>
<p>L8 (Ex. A ¶ 20)</p>	<p>Environmental Investigations: After providing the Prior Monitor the EIBLL/EBLL-Triggered Risk Assessment List, within a timeframe acceptable to the Monitor, confirm that the New York City Department of Health and Mental Hygiene performed an environmental investigation in any apartment and common areas servicing that apartment identified in the EIBLL/EBLL-Triggered Risk Assessment List. To the extent the Department of Health and Mental Hygiene has not done so, NYCHA was required to perform such environmental investigation within a timeframe acceptable to the Monitors.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 164-65)</p>

² This obligation relates to apartments on the Immediate Action List. Although NYCHA was not able to fully comply with certain interim controls required by the regulations for the Immediate Action List, its efforts to comply with those obligations have been encompassed by NYCHA's broader CU6 efforts. Thus, the Monitors consider this obligation substantially complete and will not be tracking progress against it in future reports.

<p>L9 (Ex. A ¶ 21)</p>	<p>Abatement of EBLL Apartments: After issuing or receiving the report of the environmental investigation, within a timeframe acceptable to the Monitor, complete the abatement of identified lead-based-paint hazards in accordance with 24 C.F.R. § 35.1130(c) and 35.1325.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 164-65)</p>
<p>L10 (Ex. A ¶ 22)</p>	<p>Risk Assessment of EBLL Buildings: Perform risk assessments for all other apartments in the building in which a child under age six resides or is expected to reside on the date lead-based-paint hazard reduction is complete, and common areas servicing those apartments in the developments identified in the EIBLL/EBLL-Triggered Risk Assessment List, within a timeframe acceptable to the Monitors.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 164-65)</p>
<p>L11 (Ex. A ¶ 24)</p>	<p>Information Sharing: No later than 60 days after the execution of the Agreement, enter into a written agreement with the NYC Department of Health and Mental Hygiene resolving any barriers to the sharing of information relating to resident children's blood lead levels necessary for NYCHA to make disclosures to HUD.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 164-65)</p>
<p>L12 (Ex. A ¶ 30(a))</p>	<p>One-time Certification: Submit to the United States a statement describing compliance with priority action obligations within 120 days of the Effective Date.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 155-56)</p>
<p>L13 (Ex. A ¶ 33(a))</p>	<p>Sample Kit: Display a sample kit of the supplies needed to complete an RPP work order in all 139 storerooms by January 31, 2019.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 158-60)</p>
<p>L14 (Ex. A ¶ 33(b))</p>	<p>RRP Supplies: Issue a minimum of one kit of RRP supplies to RRP-certified staff daily by February 28, 2019.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 158-60)</p>
<p>L15 (Ex. A ¶ 33(c))</p>	<p>IT Upgrades: Enhance work order system to automatically create a "dust wipe" work order if an RRP work order is generated by February 28, 2019.</p>	<p>Complete (Monitors' Report, Aug. 21, 2024, at 158-60)</p>
<p>L16 (Ex. A ¶ 33(d))</p>	<p>Dust-Control Training: Select a vendor to supplement the EPA's RRP training with</p>	<p>Complete (Monitors' Report,</p>

	practical training on dust-control measures to simulate a range of working conditions by March 31, 2019, and train substantially all RRP-certified staff by December 31, 2019.	Aug. 21, 2024, at 158-60)
L17 (Ex. A ¶ 33(f))	Visual Assessment Training: Train all maintenance workers to perform lead-based paint visual assessments by September 30, 2019.	Complete (Monitors' Report, Aug. 21, 2024, at 158-60)
L19 (Ex. A ¶ 33(g))	Painting Contracts: Secure additional, dedicated painting contracts for the Healthy Homes Department to exclusively focus on remediation by December 31, 2019.	Complete (Monitors' Report, Aug. 21, 2024, at 158-60)
Inspections		
I2 (¶ 62(h))	PHAS Inspections Action Plan: By ninety (90) days after the appointment of the Monitor, NYCHA will submit an Action Plan to the Monitor for meeting the requirements discussed in this section ("PHAS Inspections"). This Action Plan will be subject to the procedures of paragraphs 36-42.	Complete (Monitors' Report, Aug. 21, 2024, at 191)

GLOSSARY

The list of certain terms used throughout the Monitors' report appear below. Each entry notes the section in which it appears.

Abatement: Process by which existing lead-based paint hazards are permanently eliminated. **(Lead)**

Application: As agreed to by the First Monitor and NYCHA, application time is calculated from the time when a NYCHA employee confirms that there is a pest presence to the time a NYCHA employee applies the initial pest control treatment. Typically, the same NYCHA employee who performs the pest inspection applies the initial pest control treatment in one visit. Application of pest control methods should take, on average, forty-five minutes. **(Pests & Waste)**

Application of Mold-Resistant Paint: To prevent recurrence, antimicrobial mold-resistant paint is applied to walls after mold is removed. **(Mold & Leaks)**

Baez v. NYCHA, No. 13 Civ. 8915 ("Baez"): is a federal class action lawsuit brought by NYCHA residents suffering from asthma and living in apartments with mold and excessive moisture. NYCHA settled *Baez* in 2014. The resulting consent decrees impose various requirements on NYCHA that are similar but not identical to the HUD Agreement obligations and aim to help NYCHA effectively remediate mold and moisture in a timely manner. **(Mold & Leaks)**

Building Management Systems: Computerized controls that provide automation, remote monitoring, and remote control for building mechanical systems such as boiler plants. **(Heat)**

Building Information Modeling (BIM) and Computer-Aided Design (CAD) Standards: Guidelines that ensure consistency, accuracy, and compatibility in digital building designs and documentation. CAD is used for producing detailed drawings and models, while BIM builds upon CAD by incorporating data and collaboration tools to manage the entire lifecycle of a building. These standards help streamline design, improve coordination, and enhance efficiency in construction and engineering projects. **(Organizational Change)**

Clearance Examinations: Examinations conducted following lead-based-paint hazard-reduction activities to determine that the hazard reduction activities are complete and that no soil-lead hazards or settled-dust-lead hazards, as defined in HUD regulations, exist in the apartment or worksite. The clearance process includes a visual assessment and collection and analysis of environmental samples. **(Lead)**

Consolidation: A group of developments managed by the same property management office. **(Pests & Waste)**

Curbside Trash Pickup: Where garbage is piled on the curb and later collected, typically by the New York City Department of Sanitation. **(Pests & Waste)**

e-Builder: A cloud-based project management software designed for capital projects. It helps organizations track budgets, schedules, documents, and workflows in one centralized system, improving efficiency, transparency, and collaboration. **(Organizational Change)**

e-Comply: A compliance management software used to automate certified payroll tracking for capital projects. It helps ensure that contractors and subcontractors comply with prevailing wage laws by streamlining reporting, verification, and oversight, improving accuracy and accountability. **(Organizational Change)**

Elevated Blood Lead Level ("EBLL"): A confirmed concentration of lead in the blood of a child under age six equal to or greater than five micrograms per deciliter or higher. To put this into perspective, the concentration of lead in blood considered an elevated blood level is roughly equivalent in proportion to a half cup of water out of an Olympic-sized swimming pool. **(Lead)**

Emergency and Non-Emergency Work: In order to ensure that PHAS inspections capture a representative sample of physical conditions in NYCHA developments, the Agreement expressly prohibits NYCHA from performing maintenance or repairs "other than for emergency health and safety issues" in units scheduled for PHAS inspections. Conditions that could threaten the health or safety of residents, visitors, NYCHA staff, or the general public are exempted and

should be corrected without delay according to the HUD guidance. **(Inspections)**

Environmental Investigation: Process of determining the source of lead exposure for a child under age 6 with an elevated blood lead level, consisting of administration of a questionnaire, comprehensive environmental sampling, case management, and other measures, in accordance with chapter 16 of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. **(Lead)**

Heating Degree Days (HDDs): A measure of how cold it is over a period of time, calculated based on the number of degrees the daily average temperature falls below a set baseline (typically 65°F). Higher HDD values indicate greater demand for heat. **(Heat)**

Heating Outage: A failure of the central heating system that prevents the system from delivering heat to multiple apartments. It does not include instances when heat is not being provided to an individual apartment, such as when a single radiator malfunctions. **(Heat)**

Heating Season: October 1 to May 31. This is the period when resident-occupied buildings in New York City are required to be provided with heat from a central heating system. **(Heat)**

Heat Training Lab: Building on NYCHA's Elevator Training Lab, the Heat Training Lab will be a new facility designed with various mock-ups of heating equipment, including actual heating and hot water equipment currently in place at NYCHA developments, in order to train all newly assigned HMSD employees with hands-on experience, and provide continuous and refresher trainings for current staff. **(Organizational Change)**

Independent Data Analyst ("IDA"): Entity appointed under *Baez* Consent Decree to help the parties and Special Master develop a reporting system to track NYCHA's compliance with its obligations under *Baez*. The IDA is also tasked with reviewing and confirming the accuracy of the reporting and recommending improvements. **(Mold & Leaks)**

Independent Mold Analyst ("IMA"): Entity appointed under *Baez* Consent Decree to perform quality assurance by inspecting a certain number of randomly selected apartments on a quarterly basis. The IMA also reports on its

findings and makes recommendations for improved compliance. **(Mold & Leaks)**

Integrated Pest Management ("IPM"): An environmentally friendly, commonsense approach to pest control. Unlike traditional pest management, which involves the routine application of pesticide, IPM focuses on the prevention of pests and uses pesticide only as needed. It involves multiple forms of pest controls, and has a four-tier approach: (1) identify pests and monitor progress; (2) set action thresholds; (3) prevent pests; and (4) control pests. An example of IPM technique is filling cracks in an apartment to keep rats from entering. **(Pests & Waste)**

Interim Controls: Short-term measures designed to reduce temporarily human exposure or likely exposure to lead-based-paint hazards. Measures include repairs, painting, temporary containment, specialized cleaning, clearance, ongoing lead-based-paint maintenance activities, and the establishment and operation of management and resident-education programs. **(Lead)**

Lead-Based Paint Hazards: Dangerous condition created by deteriorated or disturbed lead-based paint, such as: (a) lead dust, including dust created when doors and windows stick or rub together; (b) peeling or damaged paint; and (c) painted surfaces, such as windowsills, that have been chewed on by children. **(Lead)**

Minimum Temperature: During the day (6AM to 10PM), apartments must be at least 68 degrees when the outside temperature is below 55 degrees, and at least 62 degrees at night (10PM to 6AM) regardless of the outside temperature. **(Heat)**

Modernization: Modernizing elevators refers to replacing key equipment and electronics and refurbishing the elevator cabs. **(Elevators)**

Mold: Under the HUD Agreement, mold means all species of microscopic fungi that grow in the form of filaments composed of many cells and are large enough to be visible to the unaided eye. **(Mold & Leaks)**

Mold Cleaning: To clean mold, NYCHA staff or a vendor apply a mold-specific cleaning detergent and disinfectant with as-needed manual mold removal with a brush. **(Mold & Leaks)**

Mold Inspector: A mold inspector is a Property Maintenance Supervisor, Assistant Property Maintenance Supervisor, Property Manager, or Maintenance Worker who is trained and authorized to perform initial mold inspections. A mold inspector must complete the Mold Inspector and Building Sciences Trainings before performing such inspections. **(Mold & Leaks)**

Mold Response Unit (“MRU”): Composed of NYCHA staff who provide case management support to the OCC by liaising between the OCC, residents, developments, and skilled trades to resolve escalated work orders. **(Mold & Leaks)**

Neighborhood Administrator: Each of the 29 NYCHA Neighborhoods are led by a Neighborhood Administrator (“NA”). The NA provides comprehensive oversight and management of NYCHA developments within that neighborhood, including building and ground maintenance, administrative functions, and day-to-day operations. The NA should meet regularly with Property Managers and with members of the Tenant Association to determine community needs and address concerns. **(Organizational Change)**

Neighborhood Planner: NYCHA created a “Neighborhood Planner” role to help with scheduling the required skilled trades work. **(Organizational Change)**

National Standards for the Inspection of Real Estate (NSPIRE): In June 2023, the U.S. Department of Housing and Urban Development (HUD) finalized new standards to improve the inspection process for properties and units assisted or insured by HUD. HUD replaced the former Uniform Physical Condition Standards (UPCS) with NSPIRE, after observing that UPCS contained a disproportionate emphasis on repairing otherwise safe and functional items, while inadequate attention was paid to remediating health and safety conditions. NSPIRE places renewed attention to identifying and correcting health and safety defects such as carbon monoxide, fire safety, habitability, infestation, lead-based paint, mold, structural integrity, and water safety concerns.

No-Service Condition: The HUD Agreement defines “no-service conditions” to include only a

situation where all elevators are out of service at one *building*. However, NYCHA, HUD, and SDNY have agreed that it is consistent with the purpose of the Agreement for “no-service conditions” to also include a situation where all elevators that serve an apartment are out of service, which generally means all elevators in one *bank* are out of service. For example, a single building may have one bank of elevators that serves the northern half of the building, and a second bank of elevators that serves the southern half of the building. If all of the elevators that serve the northern half of the building stop working, that would be considered a no-service condition because the apartments on the northern half of the building cannot be accessed by elevator, even though other elevators in the building continue to function. **(Elevators)**

NYCHA’s Board of Directors: NYCHA’s Board of Directors comprises seven members, including three resident members. **(Organizational Change)**

Office of Strategy and Innovation (“S&I”): S&I was created within NYCHA in 2019 to coordinate all work with the Monitor and to develop and oversee the plan that would later become the Transformation Plan. S&I currently oversees and manages the various initiatives that are intended to accomplish NYCHA’s transformation, and oversees the Performance Management and Analysis Department, which includes the Performance Tracking and Analytics Department (“PTAD”). **(Organizational Change)**

Office of Mold Assessment and Remediation (“OMAR”): NYCHA department that monitors the implementation of the mold standard procedure, works with Operations to improve NYCHA’s operational response to mold and leaks, manages mold and leak and ventilation contracts, and monitors compliance with the mold aspects of the HUD Agreement and *Baez* court orders. **(Mold & Leaks)**

Ombudsperson Call Center (“OCC”): Independent call center established under a *Baez* court order to resolve mold and leak work orders that residents state have not been appropriately resolved. **(Mold & Leaks)**

Parent Work Order: A record of a resident’s mold or leak complaint that is automatically generated when a resident makes such a

complaint. Once the work order is created, a property management employee, typically the superintendent, visits the apartment and assesses the mold or leak and tries to determine the root cause. If the visit concerned mold, the employee creates a written remediation plan. Another NYCHA employee, known as a borough scheduler, works with the resident to schedule the work contemplated by the plan. All additional work is noted in separate but related work orders called child work orders. To close the parent work order and, for the purposes of the HUD Agreement, to complete a mold or leak repair, all child work orders must also be closed. **(Mold & Leaks)**

Permanent Affordability Commitment Together (“PACT”): When a NYCHA building enters the PACT program, NYCHA continues to own the building and handle certain administrative tasks, but a third-party developer assumes management responsibilities for the building, including conducting repairs. **(Heat)**

Pest Infested Apartment: NYCHA and the First Monitor defined a “pest infested apartment” as one that has more than two verified infestations of two different types of pests (e.g., cockroaches and bedbugs) in a twelve-month period. **(Pests & Waste)**

Physical Needs Assessment (PNA): A comprehensive evaluation of a building’s condition to identify necessary repairs, maintenance, and upgrades. It helps determine the costs and priorities for keeping the property safe, functional, and up to standard. **(Organizational Change)**

Property Based Budgeting: Designed to empower Property Managers to be able to control much of the budget for their individual developments without additional layers of centralized control, consistent with HUD’s Asset Management requirements. The program is also intended to increase Property Managers’ control over skilled trades labor at the neighborhood level. **(Organizational Change)**

Property Manager: A Property Manager is the lead NYCHA employee responsible for a particular development, responsible for managing the development to an acceptable level of overall quality, occupancy, and costs, and ensuring that the development is responsive to residents’ needs. The Property Manager oversees the development’s staff, including the

Property Superintendent and Assistant Housing Managers. **(Organizational Change)**

Property Superintendent: The Superintendent operates directly under the Property Manager and oversees all maintenance and janitorial staff for the development. The Superintendent is responsible for maintaining the physical conditions of the development, including overseeing the timely and accurate completion of work order requests. In the absence of the Property Manager, the Superintendent is responsible for the development. **(Organizational Change)**

Public Housing Assessment System (“PHAS”): System used by HUD to assess the performance of public housing agencies. PHAS evaluates public housing agencies based on four main indicators: (1) physical condition; (2) financial condition; (3) management operations; and (4) capital fund management. The physical condition portion of the assessment comprises 40 points of the 100-point PHAS score. **(Inspections)**

Remote Elevator Monitoring Systems: REMS provide continuous monitoring by tracking elevator performance through sensors that detect faults. When a sensor is triggered, it generates a fault code that is stored on a local server at each elevator. The fault codes deliver high-level information about potential malfunctions, and elevator mechanics are instructed to review the codes before performing repairs or maintenance on an elevator. The newer REMS also send fault codes to a cloud-based monitoring system, alerting dispatch, the Supervisor of Elevator Mechanics (SEMS), elevator administrators, and elevator special teams, which facilitates quicker response and resolution. **(Elevators)**

Respond: The time it takes for NYCHA to respond to a pest complaint is measured from when NYCHA receives a pest complaint to when a NYCHA employee arrives at the apartment to perform the inspection and initial treatment. **(Mold & Leaks)**

Risk Assessment: An on-site investigation of lead-based paint hazards (including in paint, dust, and soil). Only a certified risk assessor can perform this type of investigation. The purpose is to determine the existence, severity, and location of lead-based paint hazards. As part of the investigation, the certified risk assessor must submit a report explaining the results and

providing options for reducing the lead-based paint hazards. **(Lead)**

Transformation Plan Project Management Office (“PMO”): The PMO meets regularly with the various NYCHA departments responsible for the Transformation Plan initiatives and reports to the Monitors on the progress or completion of all of the initiatives. **(Organizational Change)**

Transformation Plan Project “Close-Out”: Once NYCHA determines that it has completed a project by completing all of the specific tasks associated with the project, it formally “closes out” the project in a presentation to the Monitor. While this close-out means that NYCHA believes it has completed the necessary tasks for this project, the Monitors will continue to assess its impact and how NYCHA is performing in this area. **(Organizational Change)**

Visual Assessments: Visual Assessments look for (1) deteriorated paint; (2) visible surface dust, debris, and residue as part of a risk assessment or clearance examination; or (3) the completion or failure of a hazard reduction measure. **(Lead)**

Waste Management Measurement App (“WAMMA”): The First Monitor’s inspectors used WAMMA to record observations about the cleanliness of a development and rate the development’s cleanliness on a scale of one to five based on fourteen criteria. The inspectors would focus on specific developments and perform inspections at those developments at different times and on different days for four months. The First Monitor would share the inspectors’ findings with NYCHA, and the agency worked with developments to improve their cleanliness and sanitation practices. **(Pests & Waste)**

Work Order Sequencing: When a resident contacts NYCHA about a repair needed in their apartment, a “work order” is created to schedule a visit by a maintenance worker. However, many repairs require specialized skillsets, and so after the maintenance worker visits the resident’s apartment, more work orders must be scheduled for different “skilled trades” to come to the apartment—such as plumbers, carpenters, electricians, painters, and others. Work Order Reform seeks to sequence these different work orders in a more transparent and efficient manner for residents. **(Organizational Change)**