

New York City Housing Authority Monitorship

Monitors' Report
July 3, 2025

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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 fourth 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 data for February 1, 2025 to April 30, 2025.

As set forth in the report and summarized here, NYCHA should be commended for its recent progress. At the onset of the current Monitors' term, NYCHA recommitted to working closely with the federal government and the Monitors to continue building the foundation necessary for success. Now, sixteen months into the current Monitors' term, NYCHA is making important strides toward compliance with the HUD Agreement, including meeting certain requirements for the very first time since the monitorship began in 2019. In several other areas where NYCHA is not yet meeting its obligations, it is making meaningful progress. Of course, NYCHA continues to face challenges and areas in which it must still significantly improve, and there continues to be much more work to do for NYCHA to fulfill its obligation to provide safe and sanitary housing to its hundreds of thousands of residents generally, and to meet the HUD Agreement obligations specifically.

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 vital 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 SDNY and HUD officials and other stakeholders.

Property Management

NYCHA committed in the HUD 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, including:

- Pests. NYCHA met for the first time the requirement that it respond to 100% of rat complaints within five calendar days. It is also now responding to rat complaints within two days 99% of the time, a significant improvement over the 62% rate at the onset of the current Monitors' term in 2024. Similarly, NYCHA also met for the first time the requirement that it respond to 90% of other pest complaints within seven calendar days.
- Elevators. In the first quarter of Year 7, NYCHA resolved 93% of all unplanned elevator car outages within 10 hours, exceeding the 85% threshold required by the HUD Agreement and is on pace to meet this obligation for the second consecutive year. By comparison, before the current Monitors' term, NYCHA was not in compliance with this obligation. In the first quarter of Year 7, NYCHA also reduced the average duration of unplanned outages by 11%, resulting in a total reduction of the average duration of unplanned outages by 36% since the beginning of the current Monitors' term. Finally, NYCHA replaced 26 elevators in the first quarter of 2025, bringing the total number of elevators replaced since February 2024 to 130.
- Heat. NYCHA has continued to resolve more than 85% of heat outages within 12 hours, resolving 94% of outages within 12 hours through April 30, 2025, in the 2024-2025 heating season. Of the 142 boilers that have been replaced since the execution of the HUD Agreement, 44 (31%) were replaced since January 2024. Since then, NYCHA has also seen a 14%

improvement in restoring heat to apartments within 12 hours.

- Mold. NYCHA removed or remediated mold and its root causes within the specified time periods in the Agreement 22% of the time. Although this remains significantly below the 85% threshold required by the Agreement, it is an increase from the 9% performance rate at the end of the first quarter of 2024, when the current Monitors assumed their role. NYCHA also removed mold within five business days of a resident's mold complaint 18% of the time, up from 7% at the onset of the current Monitors' term. In addition, in May 2025 NYCHA finalized and published the Leak Standard Procedure ("Leak SP")—which instructs NYCHA workers how to properly detect, trace, and treat leaks—and plans to begin training workers on the procedure in July 2025. Although fully implementing the Leak SP, including training staff across all boroughs, will take approximately two years, finalizing the Leak SP is an important step toward improving NYCHA's compliance with the HUD Agreement and effectively addressing leaks in NYCHA developments.
- Lead. NYCHA continues to abate apartments at a steady pace and remains on track to meet its goal for Year 7 of the monitorship of abating 15,000 apartments total. If its current pace is maintained, NYCHA is on track to beat the 2029 Agreement requirement of abating lead-based paint in 50% of apartment units that contain lead-based paint.
- Inspections. NYCHA completed annual inspections in 57% of its occupied apartments from January 1 to April 30, 2025, up from 43% in the first four months of 2024. This will hopefully enable NYCHA to build on the progress it made during the last cycle of HUD inspections, when NYCHA's pass rate improved from 15% in 2023 to nearly half (46%) of NYCHA developments passing HUD inspections in 2024,

following the commencement of the current Monitors' term.

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

- Elevators. 5% of multi-elevator banks have already experienced more than three no-service conditions in the first quarter of Year 7. Around 1% of elevator cars have already experienced more than 12 unplanned outages in the first quarter of Year 7.
- Mold. Although NYCHA has significantly improved its timelines for responding to mold complaints, it is still far behind what the Agreement requires. Further, NYCHA has not progressed toward compliance with some of the mold growth and recurrence requirements. Indeed, the importance of addressing mold and leak issues, as well as the need to expedite related repairs, is top of mind for many residents, as expressed at a recent town hall held by the Monitors at Sumner Houses. At least two-thirds of the residents who participated in the town hall discussed lengthy wait times for repairs following damage from leaks and raised concerns about the negative impact of leaks on their living situations.
- Lead. An additional elevated blood lead level ("EBLL") finding—a confirmed concentration of lead in the blood of a child under age six that exceeds a defined threshold—was reported in a childcare center at a NYCHA development. NYCHA quickly abated the relevant center, and it is continuing to develop a comprehensive, portfolio-wide plan for testing all childcare centers on its properties. This has been a key area of concern and focus for the Monitors, who encourage NYCHA to complete testing and any needed abatement as quickly as possible at its childcare centers.

The Monitors continue to closely observe NYCHA's activity in all these areas, and the others detailed further in this report, and

continue to work collaboratively with NYCHA on further 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. That commitment is embodied in the Transformation Plan, which contains both broad principles for improvement and specific initiatives intended to improve NYCHA's processes and performance. Further detail concerning these topics is included in **Section II** of this report.

As detailed in Section II, during the last quarter, following encouragement from SDNY, HUD, and the Monitors about the need to focus on the backlog of almost 68,000 open mold and leak work orders and wait time for residents of many months for certain repairs, NYCHA agreed to implement Mold Busters Plus, a project devoted to resolving mold and leak repairs at the worst-performing developments. The goal of this important new initiative is to reduce the number of apartments requiring the most significant mold and leak-related work, as well as reduce the long wait times that residents experience for in-unit repairs. As part of this initiative, NYCHA will hire 34 new skilled trades workers whose primary focus will be addressing mold and leak-related work orders in the developments requiring the most urgent repairs. NYCHA has stated that it will begin repair work as part of this initiative in the fall of 2025 and is spending the coming weeks taking key planning and preparation steps to help the initiative succeed. NYCHA has also taken steps over the last quarter to improve its training capacity, working with the Monitor team to deliver "Train-the-Trainer" courses that will enable NYCHA's personnel to train their fellow workers, thereby expanding the number of training sessions that NYCHA can offer.

However, significant work remains for NYCHA in key areas of its transformation. For example, NYCHA must strengthen its efforts to improve the performance and accountability of its vendors. Because NYCHA relies on vendors to provide a variety of materials and services, NYCHA must improve its processes for evaluating those vendors on the quality of the materials and services they provide to NYCHA and its residents. NYCHA's existing vendor evaluation system is limited in scope, and the data from those evaluations is not always

reviewed when evaluating whether to grant a contract to a vendor, which has led to NYCHA awarding contracts to low-performing and/or problematic vendors. The Monitors continue to work with NYCHA to overcome IT and funding challenges to strengthen its vendor evaluations by increasing the number of evaluations requested, seeking feedback from employees directly involved in vendors' work, and incorporating findings from oversight departments and resident feedback into vendor contract award decisions.

Additionally, NYCHA remains engaged in at least two major IT system overhaul projects—one related to how NYCHA manages its workforce, and another associated with NYCHA's systems for resident services. These projects continue to experience delays extending the planned timelines. While an initial limited rollout of workplace management has taken place, agency-wide rollout dates have yet to be determined for either system.

Furthermore, with the encouragement of the Monitors, NYCHA is implementing meaningful organizational improvements, including the development of new and more comprehensive training for its workforce. This training has made NYCHA's central office, operational, and development staff more accountable and responsive to resident concerns. NYCHA has also overhauled daily training and guidance meetings at every development site across NYCHA and implemented programming that will lead to hundreds of additional training sessions for NYCHA employees. NYCHA has also enhanced its tracking and reporting tools to monitor efficiency, worker productivity, and other performance metrics, leading to recent reductions in overtime use, among other improvements. NYCHA has also established performance reviews for managers and pushed for and began development of long-promised performance reviews for the broader workforce, to improve accountability and workforce performance. These changes reflect a wider effort to professionalize NYCHA's operations and build a culture of accountability across all levels of its workforce.

Capital Expenditures

Since the Monitors' April 2025 Report, the Monitors continue to track NYCHA's management of City Capital Action Plan (CCAP) funding under the HUD Agreement. NYCHA received an additional \$200 million in CCAP funds from the City in fiscal year 2025, bringing

the total funding under the Agreement to \$1.4 billion. As of April 30, 2025, NYCHA has spent approximately \$572 million and has contracts in place for an additional approximately \$1.1 billion. The Monitors' ongoing review includes tracking project progress, conducting site visits, examining delays, evaluating the resulting operating impact, and regularly meeting with NYCHA's Asset & Capital Management team.

Stakeholder Engagement

Since the Monitors' April 2025 Report, the Monitors have continued to engage with residents and other stakeholders, including but not limited to the following activities:

- Two meetings of the Community Advisory Committee ("CAC");
- A town hall at Sumner Houses;
- Monitoring and inspection visits at 150 developments, including over 1300 building and grounds inspections, 181 annual inspections, and 159 mold inspections;
- Adding a NYCHA-resident-consultant to the Monitors' team;
- Responses to over 250 phone calls and emails received from residents through the Monitors' email and phone lines; and
- Regular engagement with SDNY and HUD officials.

Budget

The HUD Agreement requires the Monitors to submit an annual budget that includes expenses for staff, expert consultants, and other third-party contractors to HUD, SDNY, the City, and NYCHA. These entities have reviewed and approved a budget for Year 7 of the monitorship. By allocating funds to particular subject areas, the approved budget necessarily sets the monitorship's priorities for the year. Like the Year 6 budget, the Year 7 budget again dedicates the monitorship's funds to improving NYCHA's performance in the areas of lead paint, mold and leaks, heating, elevators, pests and waste, and inspections; assisting NYCHA in its

organizational transformation; and providing comprehensive quarterly public reporting on NYCHA's progress in each of these areas. The monitorship team includes the Co-Monitors, Jenner attorneys and staff, and subject matter expert consultants retained by the Monitors. The Monitors and all Jenner partners serve on a *pro bono* basis, while Jenner bills a flat fee of \$6.3 million for associate and staff time and donates the value of any services that exceed that amount. More than two-thirds of the total approved Year 7 budget amount of \$19,902,453.90 is allocated to subject matter experts in the areas of public housing and property management, who provide technical assistance to NYCHA, monitoring and inspection services, and various other services to support initiatives to improve NYCHA. Further details regarding the amounts reserved for and expended in each of the monitorship's focus areas will be included in the Monitors' Year 7 Annual 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 duration and number of heating failures experienced by residents.¹ The section below provides an update on NYCHA's progress with respect to outstanding heat-related obligations under the Agreement for the period from October 1, 2024, to April 30, 2025.

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.

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

The HUD Agreement requires NYCHA to replace 297 boilers by December 31, 2026.² As of April 30, 2025, NYCHA has replaced 142 boilers.³ NYCHA expects to replace nearly all of the remaining boilers by December 31, 2026, with final completion by January 2027.

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.⁴ 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.⁵ Specifically, no more than 15% of occupied apartments may experience instances where temperatures fall below the legal minimum,⁶ and no apartment may experience more than three instances where temperatures fall below the legal minimum.⁷ The Agreement specifies that NYCHA's compliance with these obligations will be assessed according to procedures agreed upon in an Action Plan.⁸

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.

The Monitors are working with NYCHA to develop a methodology to measure compliance with the HUD Agreement's temperature monitoring and in-apartment heating restoration

obligations based on residents' heat complaints and the work order data NYCHA generates when responding to those complaints.

C. Heat Demand Variation

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.

Because heating demand fluctuates with outdoor temperatures, which may impact performance, the Monitors provide data on **Heating Degree Days ("HDDs")** for the 2023-2024 and 2024-2025 heating seasons. Colder temperatures equate to higher HDDs, which means heating demand increases to keep apartments warm.

In general, temperatures have been colder in the peak winter months—December, January, and February—this heating season compared to last, meaning there has been a greater demand for heat. From October 2023 to April 2024, there were 3,748 HDDs. From October 2024 to April 2025, there were 4,050 HDDs. In other words, through April 30, 2025, the current heating season has been colder and has had approximately 8% greater heating demand than the prior heating season.

Heating Season HDDs		
Month	2023-2024	2024-2025
October	148	128
November	517	384
December	645	809
January	863	1,007
February	748	824
March	574	578
April	372	320
Total	3,867	4,050

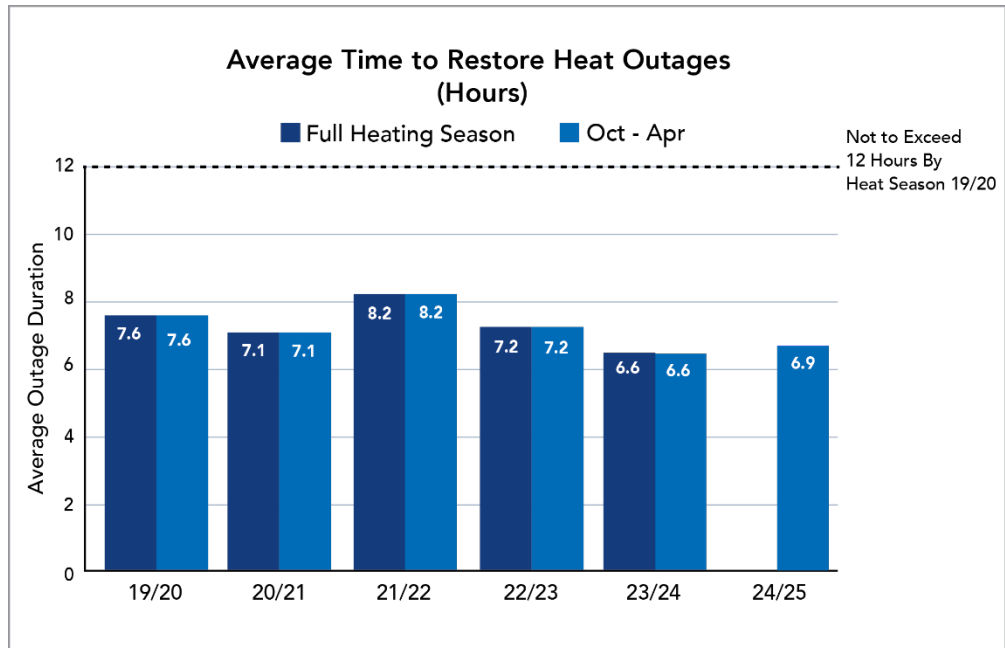
D. Heat Restoration Obligations (Requirement Nos. H6, H9, H11)

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.⁹ 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.¹⁰

These requirements apply to all heating failures—in-apartment heating failures and heating outages affecting multiple apartments within the same building.¹¹ As noted above, 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.

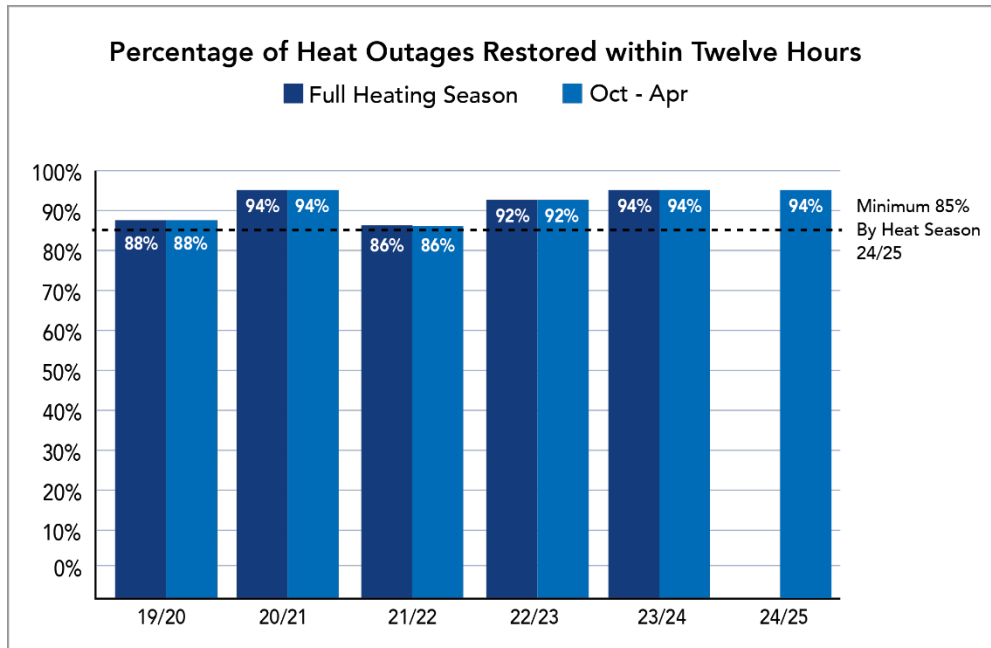
1. 12-Hour Average Heat Restoration.

Beginning with the 2019-2020 heating season, the HUD Agreement requires NYCHA to restore heat in an average of 12 hours.¹² As of April 30, 2025, NYCHA resolved heating outages to restore heat in an average of 6.9 hours, up from 6.6 hours during the same period last year. NYCHA is on track to meet this requirement for heating outages in the 2024-2025 heating season, as illustrated in the graph below.



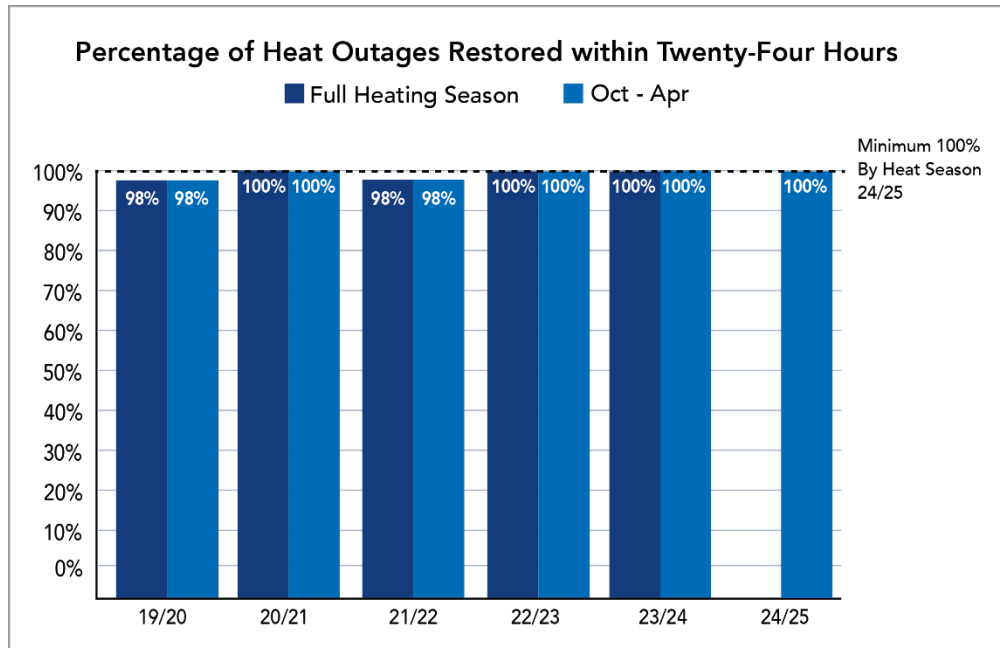
2. 12-Hour Heat Restoration.

Beginning with the 2024-2025 heating season, the HUD Agreement requires NYCHA to restore heat to 85% of apartments within 12 hours.¹³ As of April 30, 2025, NYCHA has resolved 94% of heating outages within 12 hours this heating season, matching its performance during the same period last year. NYCHA is on track to meet this requirement for heating outages in the 2024-2025 heating season, as illustrated in the graph below.



3. 24-Hour Heat Restoration.

The HUD Agreement also requires NYCHA to restore heat to 100% of apartments within 24 hours beginning with the 2024-2025 heating season.¹⁴ As of April 30, 2025, NYCHA has resolved 100% of heating outages within 24 hours this heating season, matching its performance during the same period last year. NYCHA is on track to meet this requirement for heating outages in the 2024-2025 heating season, as illustrated in the graph below.



Although the HUD Agreement does not contain a specific obligation regarding the frequency of heating outages, the Monitors observed a 37.86% increase in the number of unplanned heating outages through April 30, 2025, as compared to the same period in the last heating season. The Monitors will examine the reason for this uptick in future reporting.

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.¹⁵ 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 except in limited circumstances.¹⁶ As of April 30, 2025, NYCHA had 18 heating outages¹⁷ that lasted longer than 12 hours for which EH&S has conducted root cause failure investigations.

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

As of January 31, 2025, NYCHA has met the HUD Agreement requirement to install temperature sensors in at least 30% of the apartments in 44 developments with modernized **Building Management Systems ("BMS")**.¹⁸ NYCHA is continuing its efforts to install BMS and temperature sensors at additional developments, consistent with its 2019 Heat Action Plan.¹⁹

While 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, NYCHA is not publishing this data on its website due to concerns about the accuracy of sensor readings.²⁰

Building Management Systems ("BMS"):

Building Management Systems are computerized controls that provide automation, remote monitoring, and remote control for building mechanical systems such as boiler plants.

G. Completed, In Compliance, and Superseded Obligations

The HUD Agreement obligations that NYCHA met prior to or were superseded before the period covered by this report (**Requirement Nos. H2, H3, H4, H10, H12, H13**) are listed in Appendix A.

Overview of Outstanding Heat Obligations

The following table summarizes the status of NYCHA's compliance with the outstanding requirements of the HUD Agreement through April 30, 2025, of the 2024-2025 heating season, 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 Status
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 (total of 133) will be replaced by December 31, 2024.	TBD; 142 boilers replaced as of April 30, 2025.	NYCHA met its interim obligation to replace 133 boilers by December 31, 2024.
H5 (Ex. B ¶¶ 6–7)	Action Plan for Installing Temperature Monitoring and Disclosing Temperature Information. NYCHA will draft an action plan to set electronic temperature sensing device installation deadlines for the	Incomplete	The Monitors will work with NYCHA to update its action plan as needed in light of its concerns regarding the accuracy of the temperature sensors.

Req. No.	Description	Status	Compliance Status
	rest of all the developments and provide an appropriate mechanism for disclosing information from electronic temperature reading devices to the public.		
H6 (Ex. B ¶ 2(a))	Action Plan for Heat Mandatory Minimum Indoor Temperature: NYCHA will 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.	Incomplete	The Monitors are working with NYCHA to develop a methodology to measure compliance with the HUD Agreement's temperature monitoring and in-apartment heating restoration obligations based on residents' heat complaints and the work order data NYCHA generates when responding to those complaints. Once it is finalized, the Monitors will work with NYCHA to incorporate it into an action plan.
Occurrence Obligations			
H7 (Ex. B ¶ 2(a))	Apartments with One Violation: Beginning in the 2024-2025 Heating Season, no more than 15% of occupied	TBD	The Monitors will begin reporting on this requirement after coming to an agreement with the parties regarding how to measure

Req. No.	Description	Status	Compliance Status
	apartments shall have an occasion in which the temperatures fall below the mandatory minimum indoor temperature.		compliance with the HUD Agreement regarding heating failures in individual apartments.
H8 (Ex. B ¶ 2(b))	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.	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))	Twelve-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.	Partial compliance; 6.9 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.

Req. No.	Description	Status	Compliance Status
H11 (Ex. B ¶ 10(a))	Overall Heat Restoration (2024-2029): 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.	On track for partial compliance Heating outages: (i) 94% within 12 hours; (ii) 100% within 24 hours	Supersedes H10 (Ex. B ¶ 9(b)). From October 1, 2024, through April 30, 2025, NYCHA resolved 94% 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

Req. No.	Description	Status	Compliance Status
	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 Monitor, HUD, and SDNY.		managers, the Monitors, HUD, and SDNY, but removed this data from its website due to its concerns regarding the accuracy of the temperature sensors.

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**");²¹ (2) reduce the frequency and duration of outages for all elevator cars;²² (3) give prompt notice about elevator car outages and collect data about them;²³ (4) replace a set number of elevators;²⁴ (5) install remote elevator monitoring systems;²⁵ and (6) establish schedules for cleaning elevators and other planned elevator car outages that limit the inconvenience caused to residents.²⁶ 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, 2025, to April 30, 2025.

A. Elevator Replacements (Requirement No. E1)

The HUD Agreement required NYCHA to replace 275 elevators in its buildings by December 31, 2024.²⁷ NYCHA has not met this obligation, completing 168 of the required elevator replacements by December 31, 2024.²⁸ Since then, NYCHA has completed 34 additional elevator replacements, with 202 total elevators replaced as of April 30, 2025. NYCHA expects to complete the remaining 73 elevator replacements by December 31, 2025.

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. 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 Agreement-restricted 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

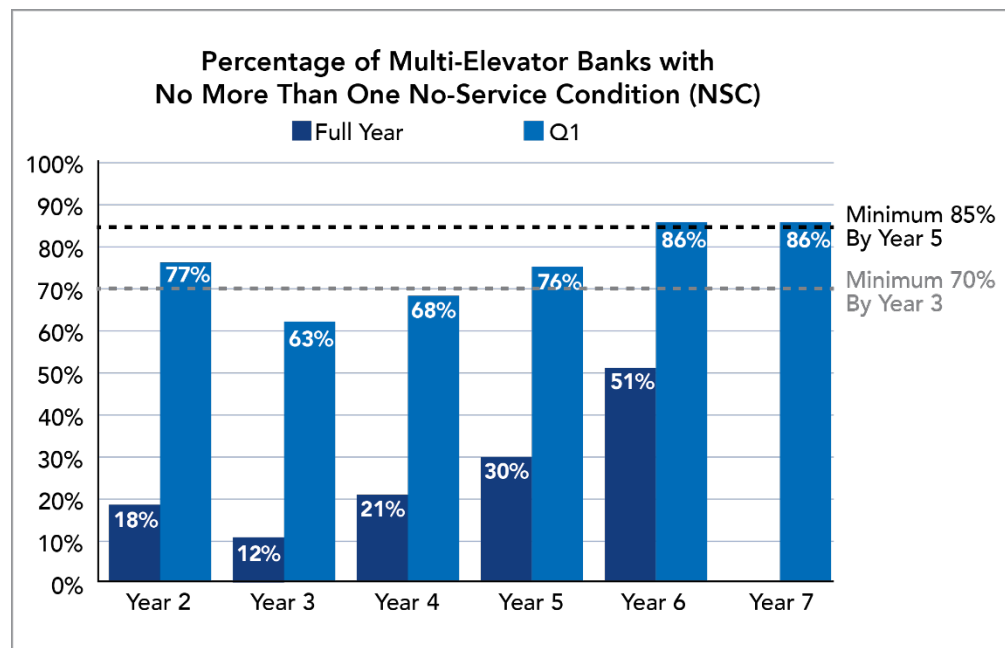
No-Service Condition:

The HUD Agreement defines a "no-service condition" 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 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.

NYCHA developments, there are 709 elevator banks with multiple elevators.²⁹

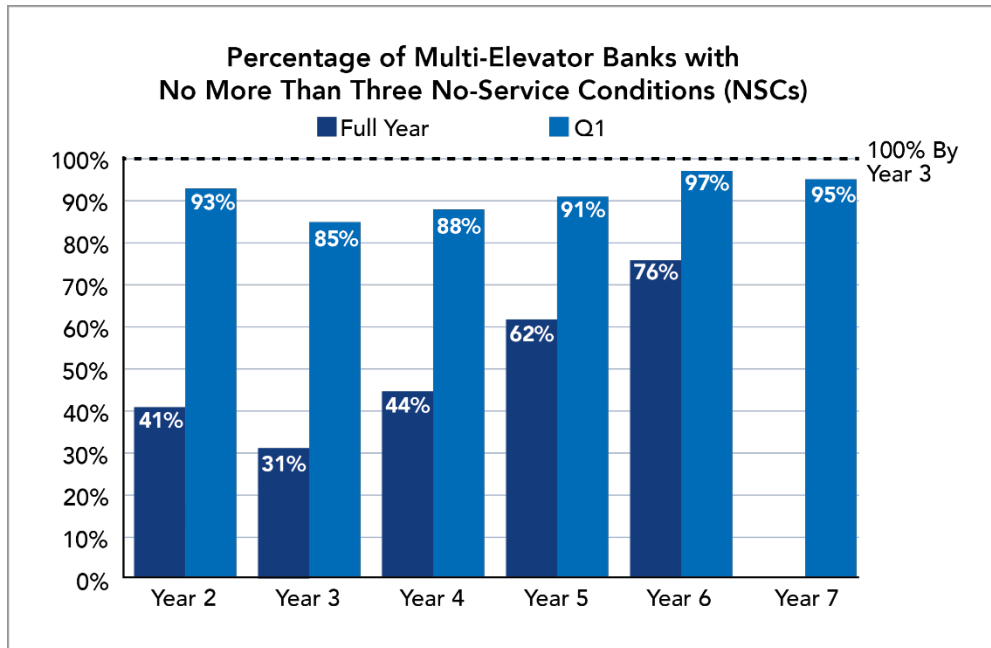
a. No More Than One No-Service Condition Per Year (Requirement No. E7)

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.³⁰ As of April 30, 2025, 86% of multi-elevator banks have experienced no more than one no-service condition this year, matching NYCHA's performance during the same period last year.



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.³¹ As of April 30, 2025, 95% of multi-elevator banks have not experienced more than three no-service conditions this year, down two percentage points from the same period last year.

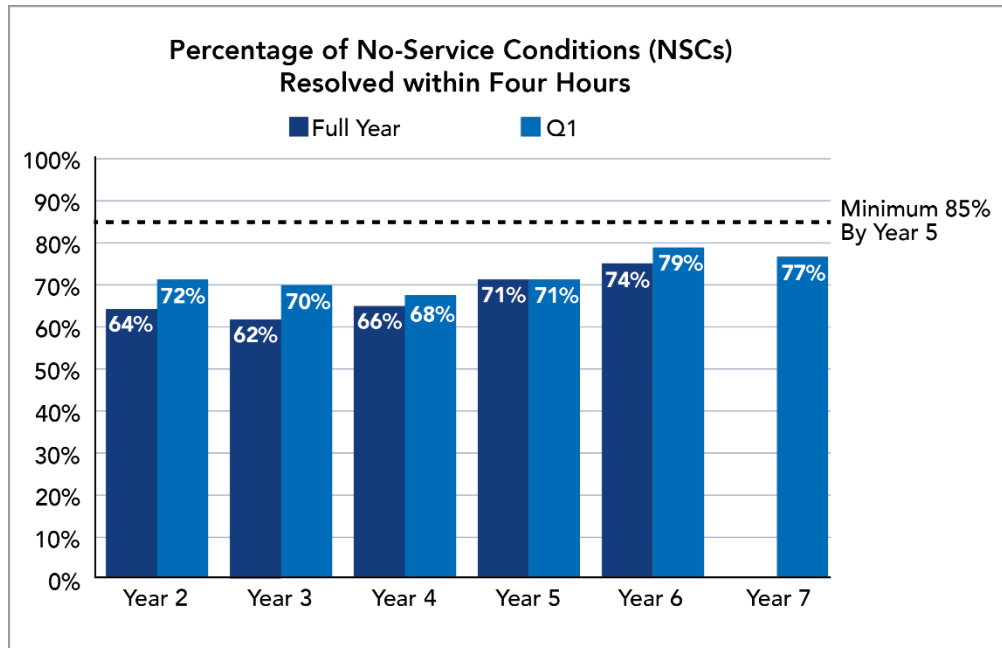


2. Duration of No-Service Conditions (Requirement Nos. E15-E16)

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.³²

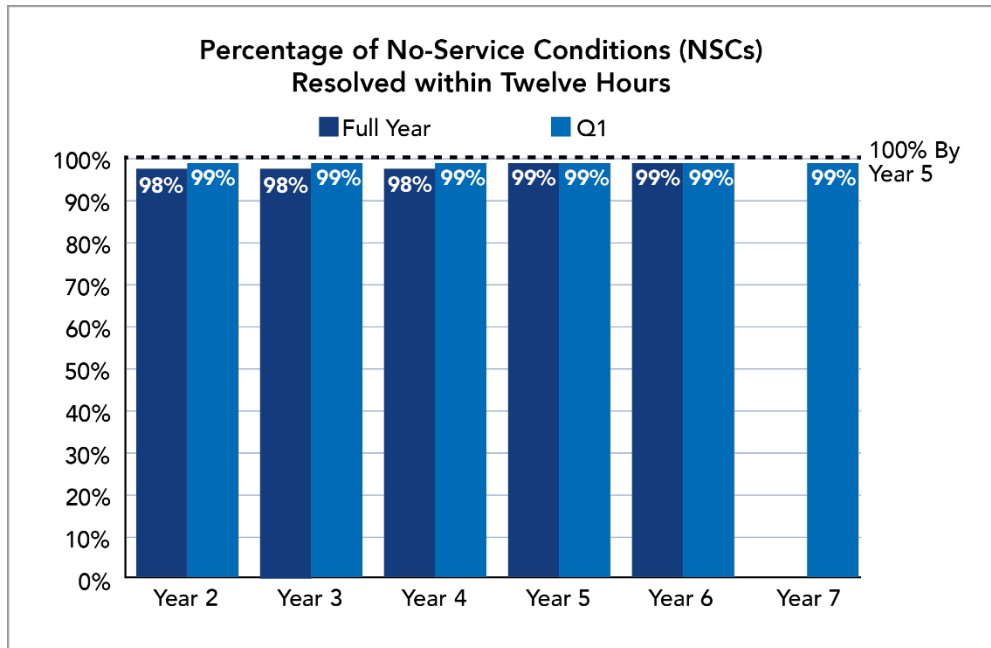
a. Four-Hour No-Service Resolution Obligation (Requirement No. E15).

Beginning in Year 5, the HUD Agreement requires NYCHA to resolve 85% of no-service conditions within four hours of learning of them.³³ As of April 30, 2025, NYCHA has resolved 77% of no-service conditions within four hours, two percentage points lower than the same period last year.



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

Beginning in Year 5, the HUD Agreement requires NYCHA to resolve all no-service conditions within 12 hours, with limited exceptions.³⁴ As of April 30, 2025, NYCHA has resolved 99% of no-service conditions within 12 hours, matching its performance during the same period last year.



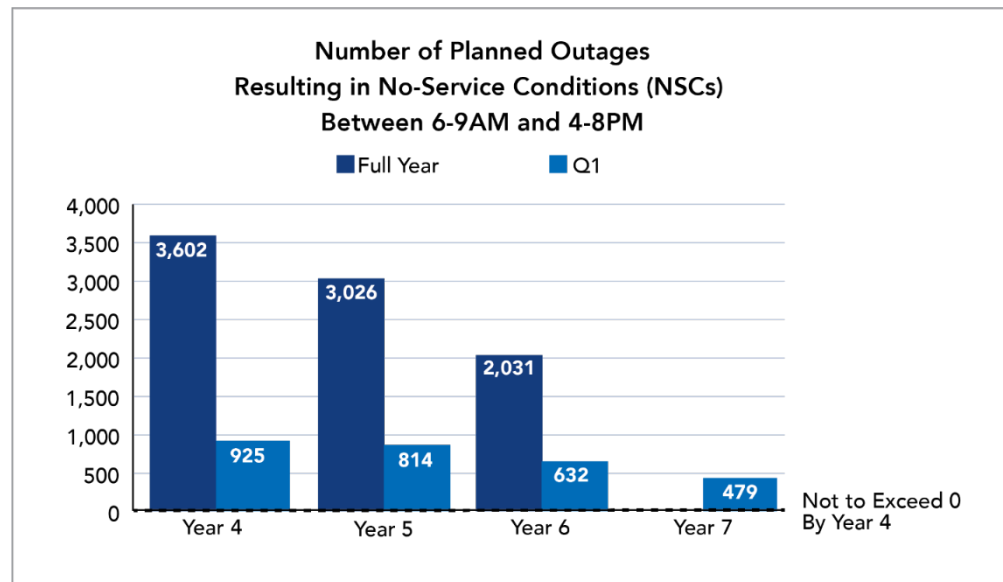
3. Timing of No-Service Conditions and Providing Advance Notice to Residents (Requirement Nos. E20, E22)

To minimize disruption to residents during specified 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., with limited exceptions.³⁵ 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.³⁶

NYCHA has not been in compliance with these requirements. Residents have indicated that NYCHA frequently shuts down elevators with minimal notice and during the Agreement-restricted hours, and NYCHA has confirmed that it does so.³⁷ However, NYCHA noted that most, if not all, of these reported shutdowns were due to preventive maintenance, which is a requirement of New York City regulations and helps improve elevator performance. Moreover, as confirmed by an analysis conducted by the Monitors, the majority of no-service conditions resulting from preventive maintenance during Agreement-restricted hours occurs between 8:30 a.m. and 9:00 a.m., not during the entirety of the Agreement-restricted hours.³⁸ The

Monitors have discussed the benefits of preventive maintenance, the importance of these requirements, and the challenges NYCHA faces in completing preventive maintenance in prior reports.³⁹ NYCHA and the Monitors continue to discuss ways to complete preventive maintenance in compliance with the HUD Agreement.

NYCHA has continued to reduce the number of planned outages, including preventive maintenance outages, resulting in no-service conditions during Agreement-restricted hours. As of April 30, 2025, 479 no-service conditions have resulted from planned outages, including preventive maintenance outages, during Agreement-restricted hours this year, which is 153 fewer no-service conditions than during this same period last year.



As discussed in the Monitors' April 2025 Report, NYCHA launched 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.⁴⁰ The pilot program began on March 17, 2025, and is ongoing.

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

The HUD Agreement requires NYCHA to reduce how often and for how long elevator cars experience service disruptions. The subsections below provide an update on NYCHA's obligations to (1)

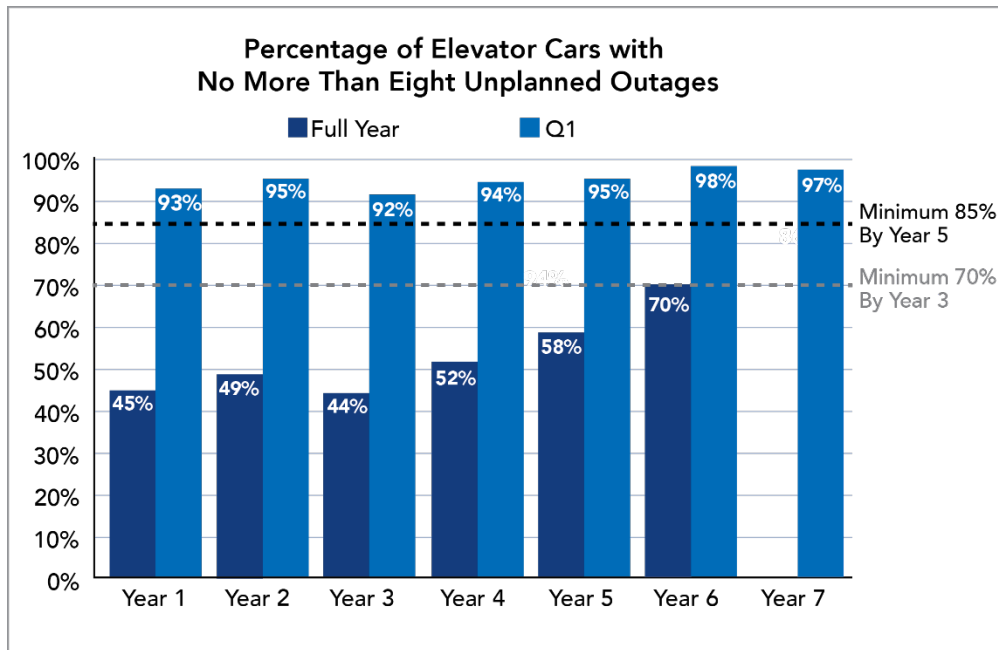
reduce the frequency of unplanned elevator car outages; and (2) reduce the duration of elevator car outages.

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

The HUD Agreement requires NYCHA to reduce the frequency of all 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).

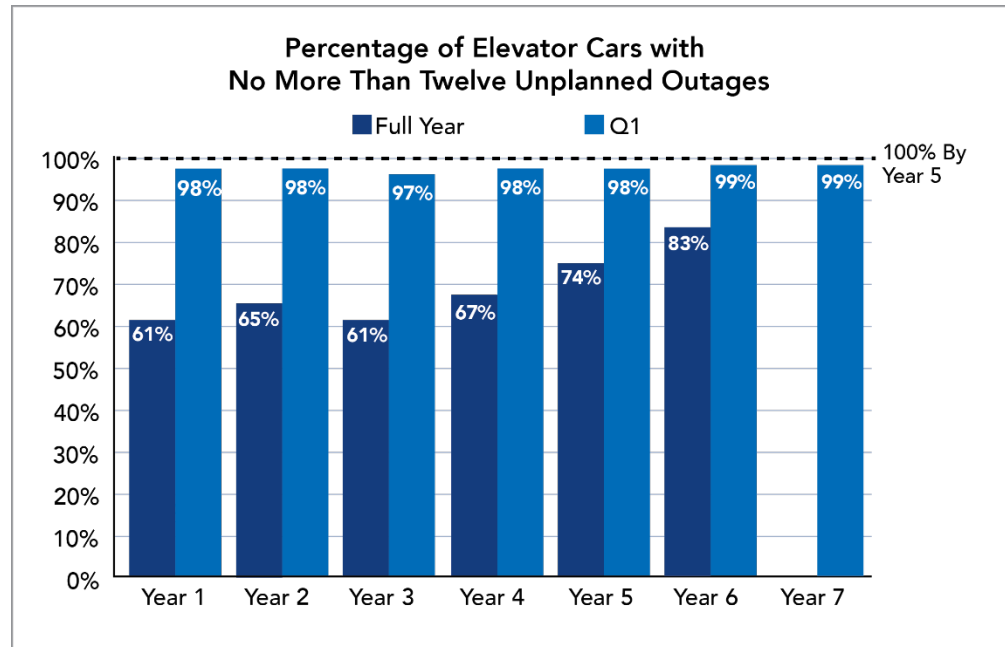
Beginning in Year 5, the HUD Agreement requires NYCHA to ensure that at least 85% of elevator cars have no more than eight unplanned outages per year.⁴¹ As of April 30, 2025, 97% of elevator cars have not experienced more than eight unplanned outages this year, down one percentage point from the same period last year.



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 12 unplanned outages per year.⁴² As of April 30, 2025, 99% of elevator cars have not

experienced more than 12 unplanned outages this year, matching NYCHA's performance during the same period last year.

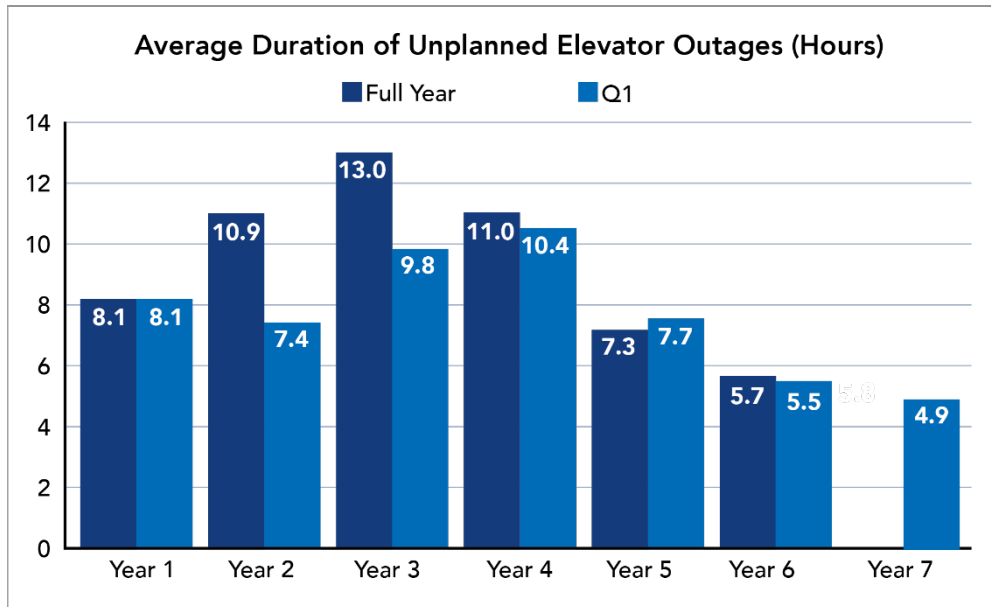


2. Duration of Elevator Car Outages (Requirement Nos. E17-E19)

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

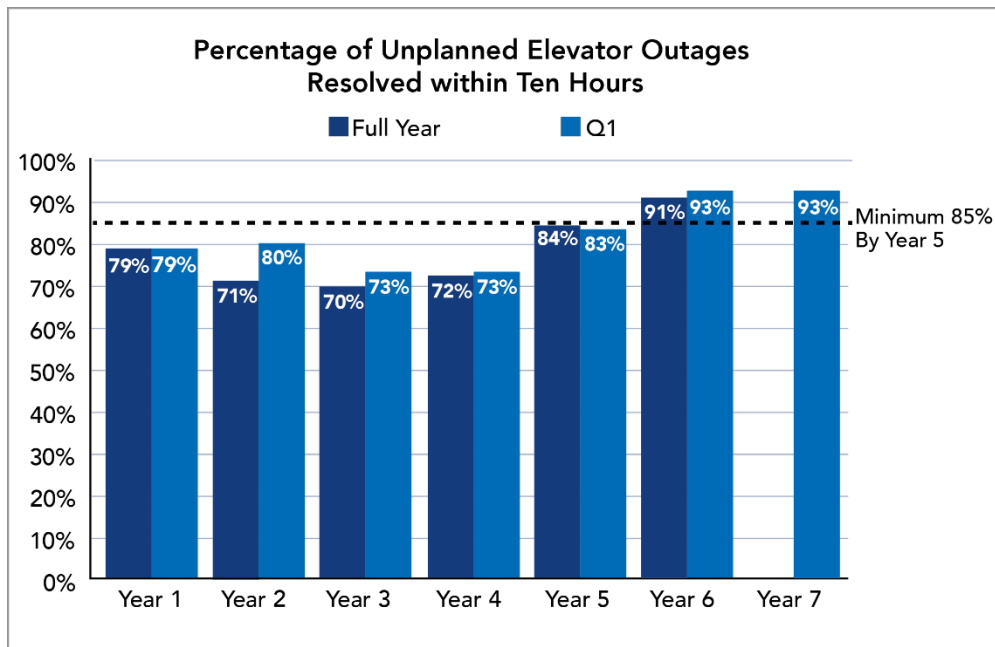
a. Percentage Reduction in Outage Duration (Requirement No. E17).

The HUD Agreement has required 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.⁴³ Before Year 7, NYCHA and the Monitors agreed to target a 10% reduction in Year 7. Currently, NYCHA is beating this target. As of April 30, 2025, the average elevator car outage duration has been 4.9 hours, which is 11% lower than the average during the same period last year.



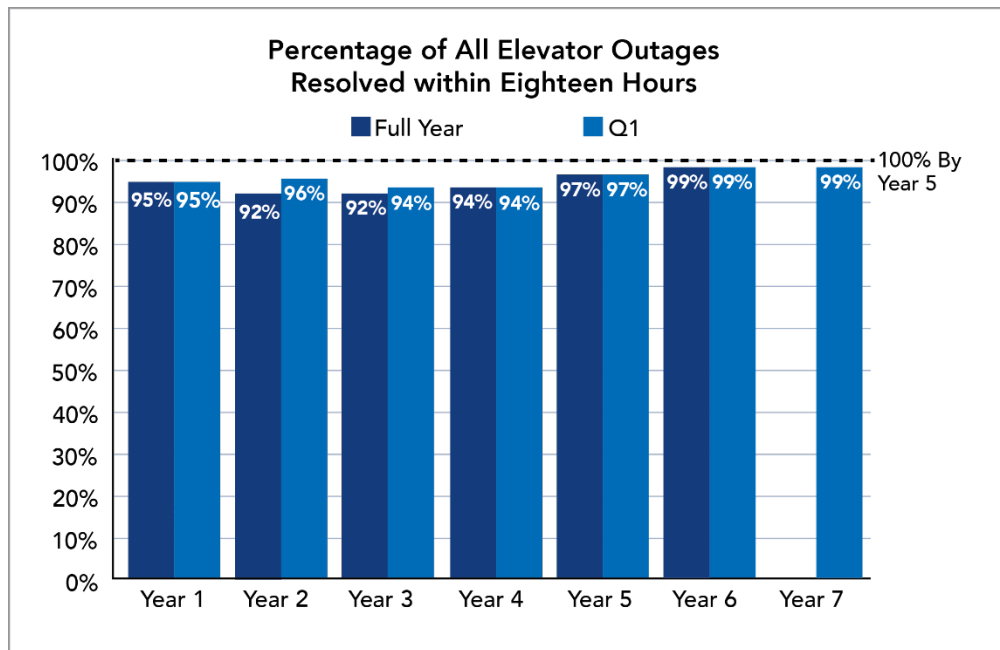
b. Ten-Hour Outage Obligation (Requirement No. E18).

Beginning in Year 5, the HUD Agreement requires NYCHA to resolve 85% of unplanned elevator car outages within ten hours of learning of them.⁴⁴ As of April 30, 2025, NYCHA has resolved 93% of unplanned elevator car outages within ten hours, matching its performance during the same period last year.



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

Beginning in Year 5, the HUD Agreement also requires NYCHA to resolve all elevator car outages within 18 hours, with limited exceptions.⁴⁵ As of April 30, 2025, NYCHA has resolved 99% of all elevator car outages within 18 hours, matching its performance during the same period last year.



D. **Completed, In Compliance, and Superseded Obligations**

The HUD Agreement obligations that NYCHA met prior to or were superseded before Year 6 (**Requirement Nos. E2, E3, E4, E5, E6, E9, E11, E13, E14, E23**) are listed in Appendix A. Verification of NYCHA's completion of the Agreement obligations E2 (Ex. B ¶ 34(b)) and E5 (Ex. B ¶ 31) is ongoing.

Overview of Outstanding Elevator Obligations

The following table summarizes the status of NYCHA's compliance with the outstanding requirements of the HUD Agreement through the end of the first quarter of Year 7 (April 30, 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 at least 275 elevators.	Not met	By December 31, 2024, NYCHA completed 168 of the required elevator replacements. As of April 30, 2025, NYCHA has completed 202 elevator replacements. NYCHA expects to complete 275 elevator replacements by December 31, 2025.
Occurrence Obligations			
E7 (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	TBD; 86% as of Q1 Year 7	As of April 30, 2025, 14% of multi-elevator banks had more than one no-service condition in Year 7.

Req. No.	Description	Status	Compliance Details
	will have no more than one instance per year where all elevators are out of service.		
E8 (Ex. B ¶¶ 23(a), 24(a))	Buildings with Three No-Service Conditions: Beginning in Year 3, no elevator bank with more than one elevator shall have more than three no-service conditions per year.	Not in compliance; 95% as of Q1 Year 7	As of April 30, 2025, 5% of multi-elevator banks had more than three no-service conditions in Year 7.
E10 (Ex. B ¶ 24(b))	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.	TBD; 97% as of Q1 Year 7	As of April 30, 2025, 3% of elevators had more than eight unplanned outages in Year 7.
E12 (Ex. B ¶ 24(b))	Twelve Unplanned Outages: Beginning in Year 5, no elevator shall	Not in compliance; 99% as of Q1 Year 7	As of April 30, 2025, 1% of elevators had more than 12 unplanned outages in Year 7.

Req. No.	Description	Status	Compliance Details
	have more than 12 unplanned outages per year.		
Response Obligations			
E15 (Ex. B ¶ 29(a)(i))	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.	Not in compliance; 77% as of Q1 Year 7	As of April 30, 2025, 23% of no-service conditions resulting from unplanned outages lasted more than four hours in Year 7.
E16 (Ex. B ¶ 29(a)(ii))	Twelve-Hour No-Service Conditions: Beginning in Year 5, no no-service condition shall last more than 12 hours, with limited exceptions.	Substantial compliance; 99% as of Q1 Year 7	As of April 30, 2025, 1% of no-service conditions resulting from all qualifying outages lasted more than 12 hours in Year 7. Of the limited exceptions provided for by the Agreement, NYCHA only tracks outages due to elevator rehabilitation or replacement, and no-service conditions resulting from these outages are excluded. NYCHA does not track the industry-accepted repair

Req. No.	Description	Status	Compliance Details
			time or if the outage requires NYCHA to order unavailable parts. Accordingly, the Monitors' assessment of NYCHA's performance under this obligation may include such outages.
E17 (Ex. B ¶ 28)	Improved Outage Duration: After Year 1, the outage duration shall improve over the prior year by a rate set by the Monitors.	TBD; 11% lower average unplanned outage duration compared to same period last year	The Monitors set a target of 10% reduction in outage duration for Year 7. As of April 30, 2025, NYCHA has decreased its average unplanned outage duration from 5.5 hours in the first quarter of Year 6 to 4.9 hours in the first quarter of Year 7.
E18 (Ex. B ¶ 29(b)(iii))	Ten-Hour Elevator Car Outages: Beginning in Year 5, at least 85% of elevator car outages shall be resolved within ten hours of the time NYCHA learns of them.	On track to comply; 93% as of Q1 Year 7	As of April 30, 2025, only 7% of unplanned elevator car outages lasted more than ten hours in Year 7.

Req. No.	Description	Status	Compliance Details
E19 (Ex. B ¶ 29(b)(iv))	Eighteen-Hour Elevator Car Outages: Beginning in Year 5, no elevator car outage shall last more than 18 hours, with limited exceptions.	Substantial compliance; 99% as of Q1 Year 7	As of April 30, 2025, 1% of all qualifying elevator car outages lasted more than 18 hours in Year 7. Of the limited exceptions provided for by the Agreement, NYCHA only tracks outages due to elevator rehabilitation or replacement, and these outages are excluded. NYCHA does not track the industry-accepted repair time. Accordingly, the Monitors' assessment of NYCHA's performance under this obligation may include such outages.
E20 (Ex. B ¶ 32)	Resident Outage Notification System: NYCHA will provide 24 hours' advanced notice of all planned outages and notice of all unplanned outages within two hours to residents of	Not in compliance	NYCHA does not comply with this obligation because it does not provide adequate notice to residents for outages due to preventive maintenance. However, in some instances, NYCHA makes postings in the buildings affected by the outages the night before the

Req. No.	Description	Status	Compliance Details
	buildings affected by the outages. Notice shall occur by robo calls and postings in the building and on the NYCHA website.		preventive maintenance outage and is making efforts to expand that practice. NYCHA does not currently send robo calls for preventive maintenance outages except at South Jamaica Houses, where it is conducting a pilot with regard to scheduling preventive maintenance outages and providing at least 24 hours' advanced notice to residents.
E21 (Ex. B ¶ 33)	Monitor Outage Notification: 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.	Not in compliance	NYCHA does not comply with this obligation because it generally does not provide notice to the Monitors for outages due to preventive maintenance. In Year 7, NYCHA began sharing with the Monitors schedules for outages due to preventive maintenance at selected developments, and NYCHA plans to expand this practice.

Req. No.	Description	Status	Compliance Details
Policy and Practice Obligations			
E22 (Ex. B ¶ 27)	Planned Outages: By February 1, 2020, NYCHA shall not have planned outages resulting in a no-service condition between 6:00 a.m. and 9:00 a.m. or between 4:00 p.m. and 8:00 p.m., except for planned elevator rehabilitation or replacement or outages mandated by another governmental agency or regulatory entity.	Not in compliance; NYCHA had 479 instances of planned outages resulting in a no-service condition during the Agreement-restricted hours in Q1 Year 7.	NYCHA does not comply with this obligation. As of April 30, 2025, planned outages, including service disruptions due to preventive maintenance, continue to result in no-service conditions during the prohibited hours.

I.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.

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;⁴⁶ (2) respond to residents’ pest complaints within prescribed deadlines;⁴⁷ (3) apply timely and effective pest management techniques informed by **Integrated Pest Management (“IPM”)** practices;⁴⁸ (4) increase cleanliness at developments by improving waste management practices;⁴⁹ and (5) upgrade specified pest and waste management infrastructure.⁵⁰ The section below provides an update on NYCHA’s progress with respect to pest- and waste-related requirements under the Agreement and waste-management related capital projects for the period from February 1, 2025, to April 30, 2025.

In the first quarter of Year 7, NYCHA responded to pest complaints more quickly, even as estimates of pest populations grew. In this quarter, NYCHA met for the first time the requirement that it respond to 100% of rat complaints within five calendar days. NYCHA also met for the first time the requirement that it respond to 90% of other pest complaints within seven calendar days. However, the pest population estimates for cockroaches, mice, and rats increased compared to the same period last year.

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.⁵¹ Using the Protocols, NYCHA must publish those estimates on its website so stakeholders, including residents, can see whether NYCHA is reducing pest populations.⁵² The Agreement also requires NYCHA to meet certain pest population reduction targets.⁵³

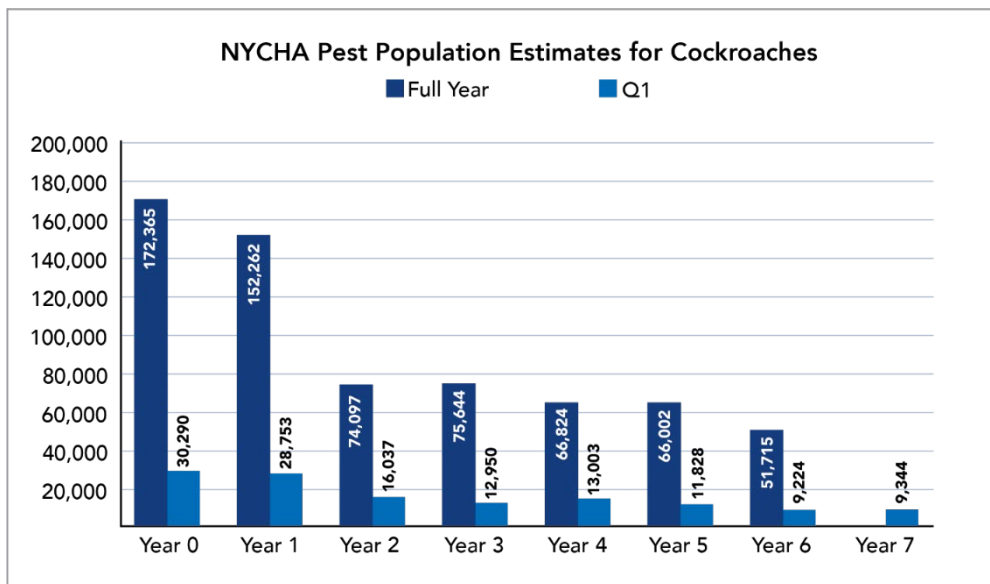
The following subsections provide an update on (1) NYCHA’s plan for publishing the pest population estimates on its website, (2) NYCHA-wide pest population estimates for the first quarter of Year 7, and (3) NYCHA’s progress in meeting the outstanding reduction target requirements.

1. Publish Pest Population Estimates

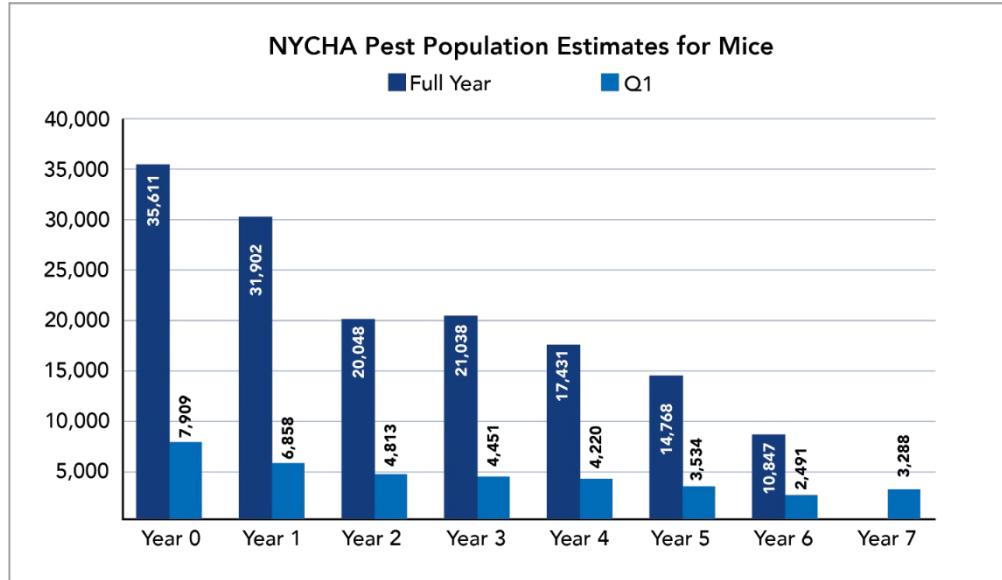
As discussed in the April 2025 Report, the Monitors, in consultation with NYCHA, developed Protocols to establish reasonable estimates of the presence of pests.⁵⁴ These estimates, as reflected in the charts below, do not count the actual number of pests, as that would be unfeasible. Instead, the pest population estimates measure the pest presence at NYCHA based on residents' pest complaints adjusted for over- and underreporting, a process described in previous reporting.⁵⁵

Under the HUD Agreement, once the Monitors establish the Protocols, NYCHA is required to use the Protocols to develop and publish reliable pest population estimates for each development at least quarterly on its website.⁵⁶ In collaboration with the Monitors, NYCHA is developing a process to do so. It estimates that it will begin publishing the pest population estimates in early 2026. The Monitors are working with NYCHA to expedite this process. In the meantime, the Monitors will include NYCHA-wide pest population estimates in their quarterly reporting.

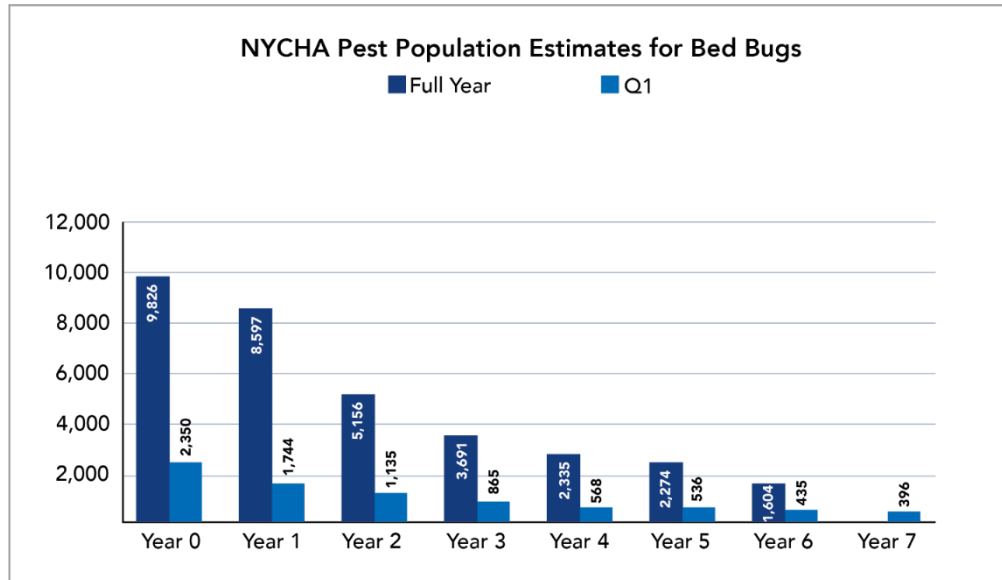
As of April 30, 2025, the pest population estimate for cockroaches was nearly 9,400,⁵⁷ up slightly (about 1%) from the same period last year.⁵⁸



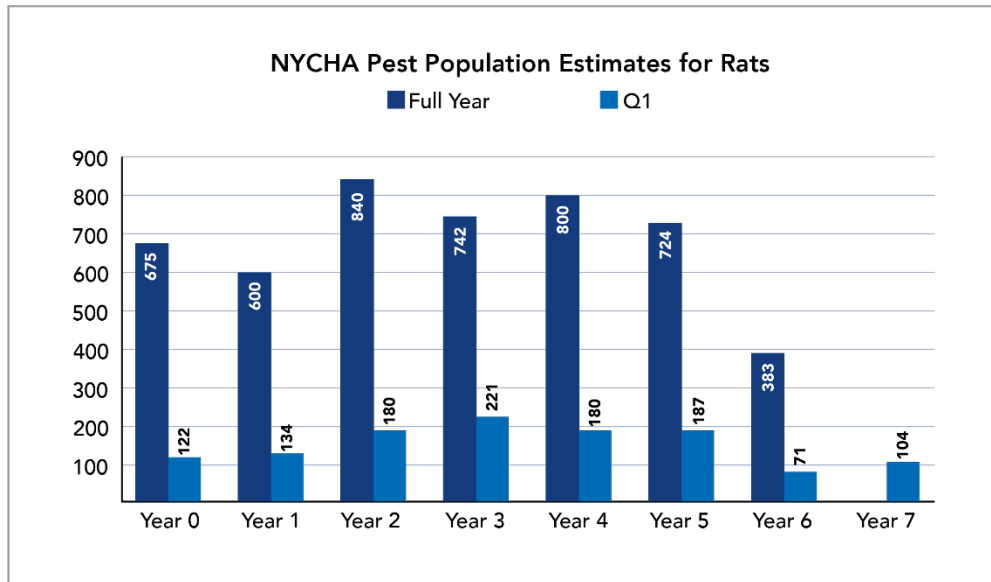
As of April 30, 2025, the pest population estimate for mice was about 3,300, up significantly (about 32%) from the same period last year.



As of April 30, 2025, the pest population estimate for bed bugs was about 400, notably down (about 10%) from the same period last year.



As of April 30, 2025, the rat population estimate was about 100, up significantly (about 46%) from the same period last year.



2. Reduce Pest Populations

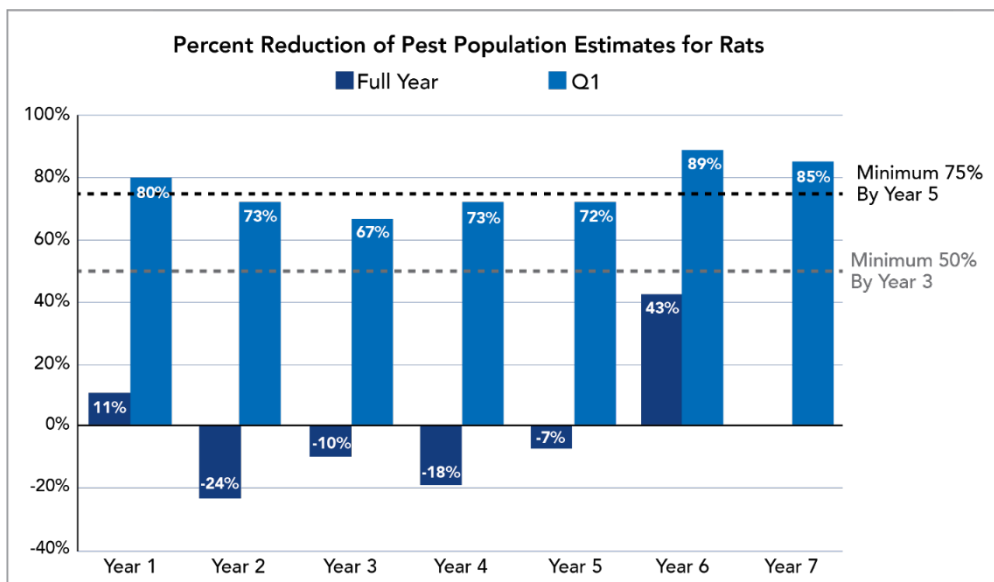
The HUD Agreement required NYCHA to reduce pest populations by certain percentages by the end of Year 3⁵⁹ and by the end of Year 5.⁶⁰ As discussed in the April 2025 Report, NYCHA met the pest reduction targets for mice, cockroaches, and bed bugs in Year 6.⁶¹

For rats, by the end of Year 3, NYCHA was required to reduce the rat population by 50%, and by the end of Year 5, by an additional 50%.⁶² This means that NYCHA was required to cumulatively reduce the rat population by 75% by the end of Year 5.

NYCHA has not yet met the first or second reduction requirement for rats.⁶³ As depicted in the chart below, NYCHA began substantially improving in Year 5.

As of April 30, 2025, the percent reduction for rats was 85%, down four percentage points from the same period last year, meaning the rat population was higher than during the same period last year. The rat reduction requirements are evaluated yearly, and NYCHA historically has had higher rat reduction rates in the first quarter of the year than the overall reduction rate for that year. So although the rat reduction rate for the first quarter of Year 7 was 85%, the Monitors cannot yet determine that NYCHA has met the rat reduction targets for the year. If NYCHA maintains its 85% reduction

rate for the full year, it will substantially exceed both rat reduction targets of 50% and 75% in Year 7.



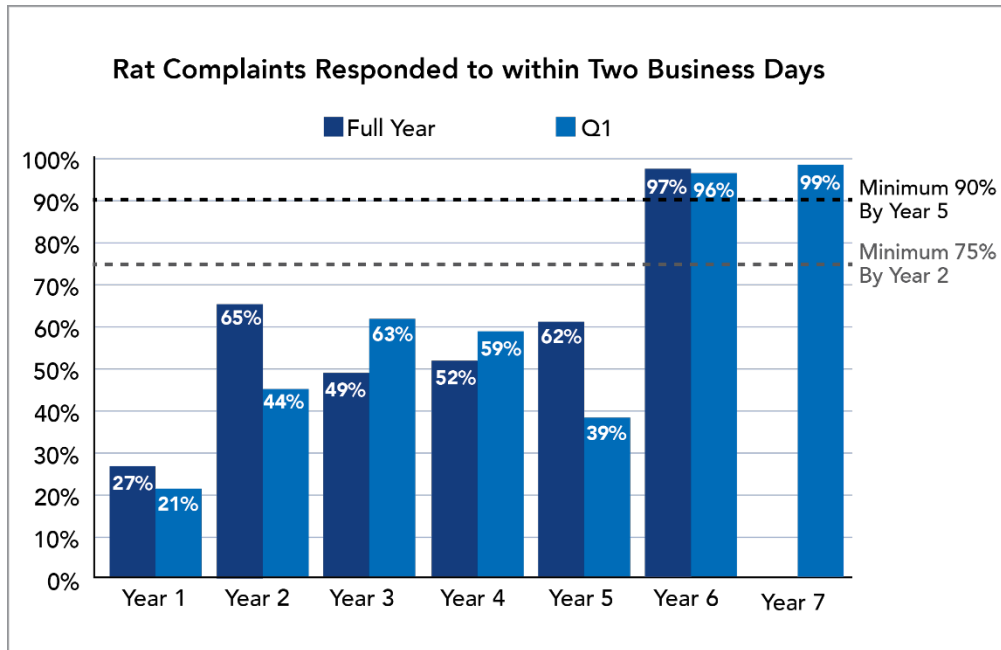
B. Respond to Resident Pest Complaints (Requirement Nos. P14-P15)

Under the HUD Agreement, NYCHA must respond to resident pest complaints in apartments within certain timeframes depending on the pest.⁶⁴ The subsections below provide an update on NYCHA's progress meeting these requirements.

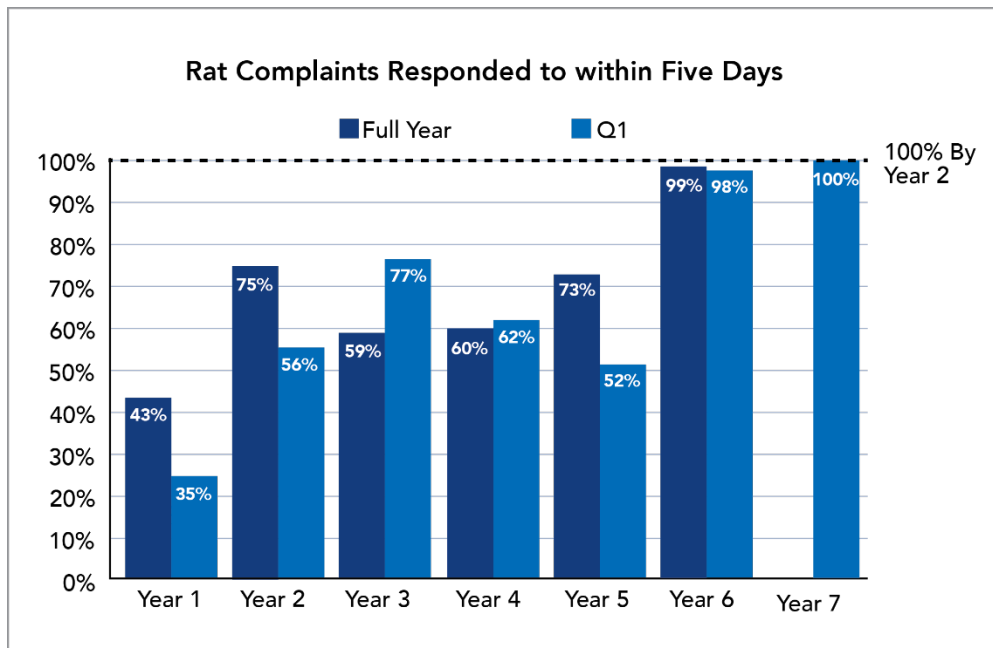
1. Respond to Rat Complaints (Requirement No. P14)

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.⁶⁵

As of April 30, 2025, NYCHA responded to 99% of all rat complaints within two business days, three percentage points higher than the same period last year.



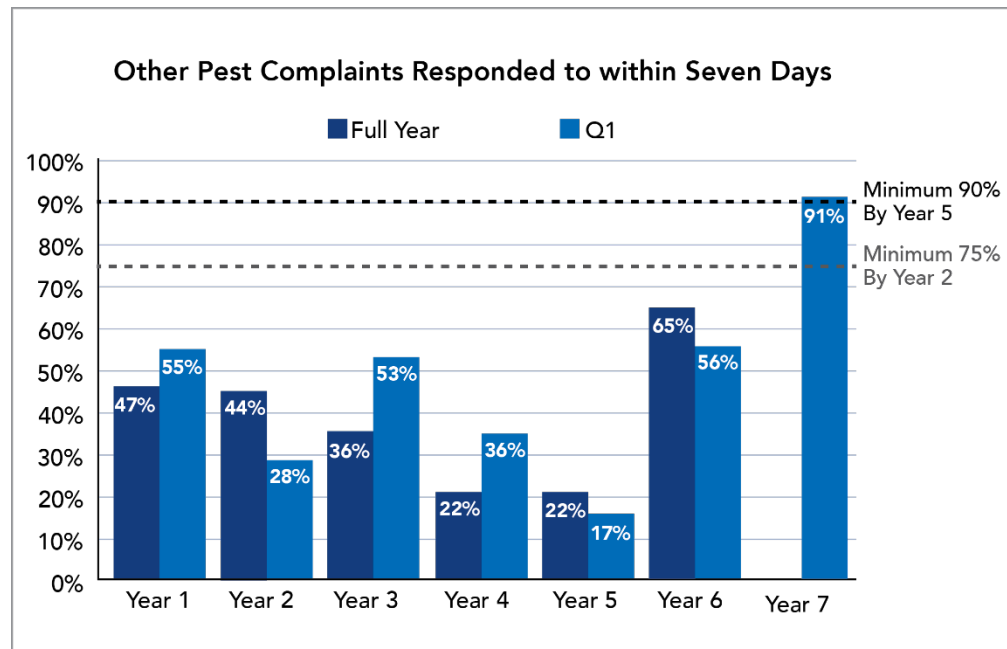
As of April 30, 2025, NYCHA responded to 100% of resident rat complaints within five calendar days, two percentage points higher than the same period last year. This is the first time NYCHA has met this requirement.



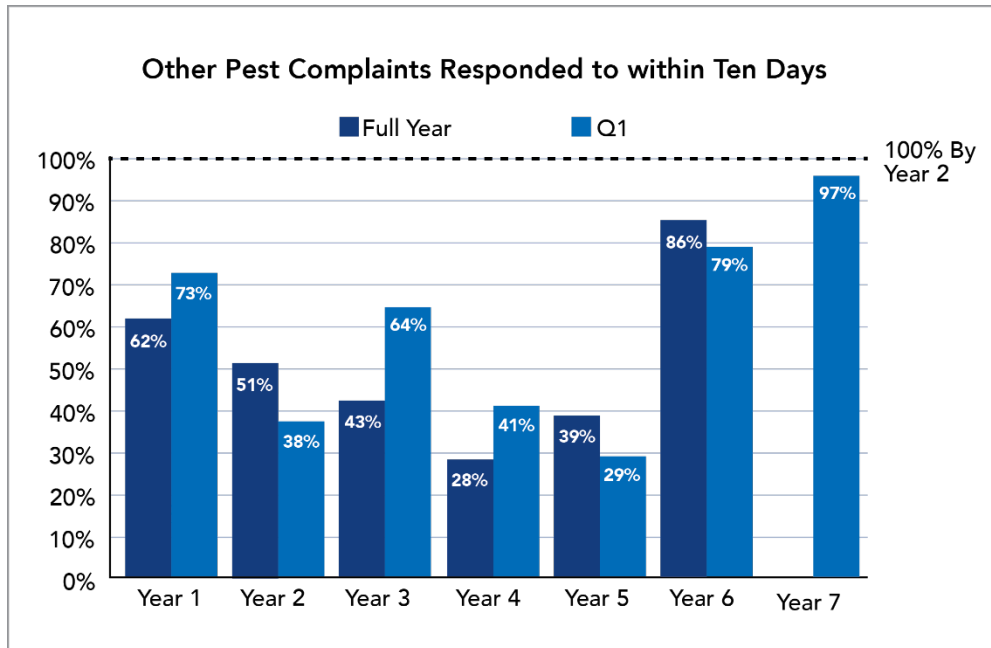
2. Respond to Other Pest Complaints (Requirement No. P15)

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 2.⁶⁶

As of April 30, 2025, NYCHA responded to 91% of other pest complaints within seven calendar days, 35 percentage points higher than the same period last year. This is the first time NYCHA has met this requirement.



Similarly, NYCHA responded to 97% of other pest complaints within ten calendar days, 18 percentage points higher than the same period last year.



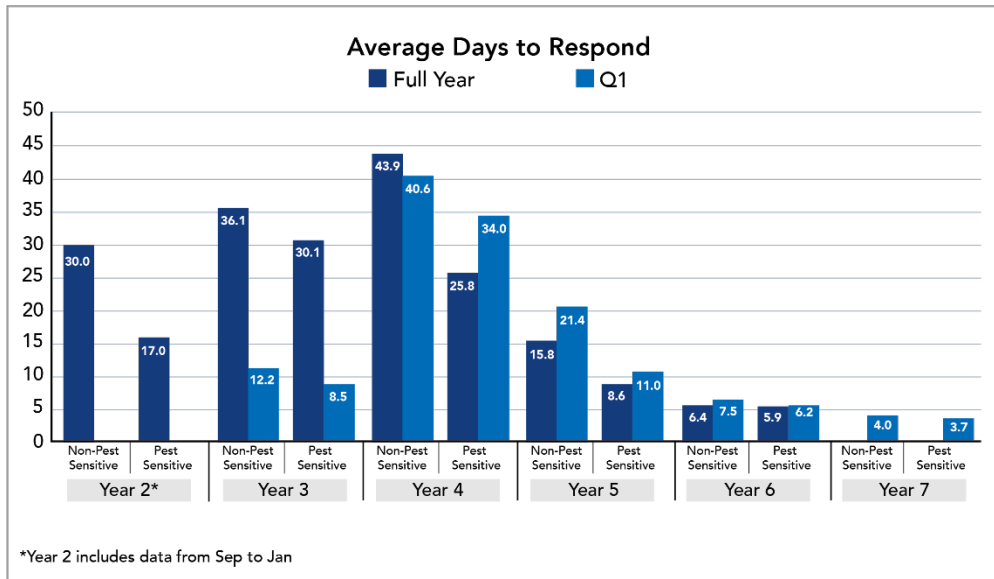
C. Address Pest Complaints from Residents with Health Conditions in an Expedited Manner (Requirement No. P17)

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 Units") and to **apply** pest control methods in Pest Sensitive Units in an expedited manner.⁶⁷

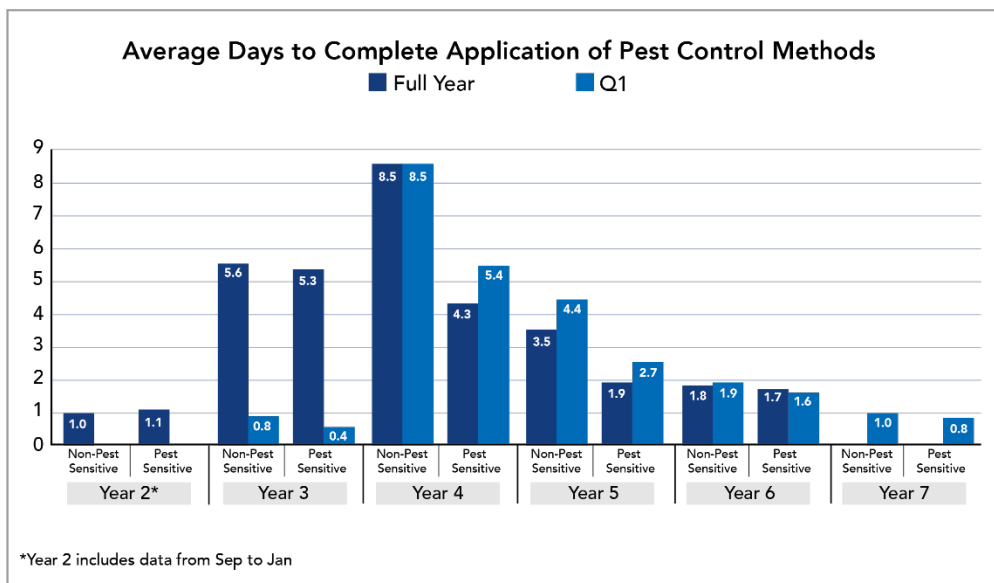
The First Monitor and NYCHA agreed that to satisfy this requirement, NYCHA would address pest complaints in Pest Sensitive Units more quickly than in other apartments.

As of April 30, 2025, NYCHA responded to pest complaints in Pest Sensitive Units more quickly than to other apartments, meeting the Agreement requirement, as it did during the same period last year. NYCHA also significantly improved its response time compared to the same period last year.

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.



Likewise, NYCHA applied pest control methods more quickly in Pest Sensitive Units than in other apartments, meeting the Agreement requirement, as it did during the same period last year. NYCHA also significantly improved its application time compared to the same period last year.



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

The HUD Agreement requires NYCHA to consistently and comprehensively implement IPM practices.⁶⁸ 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.⁶⁹

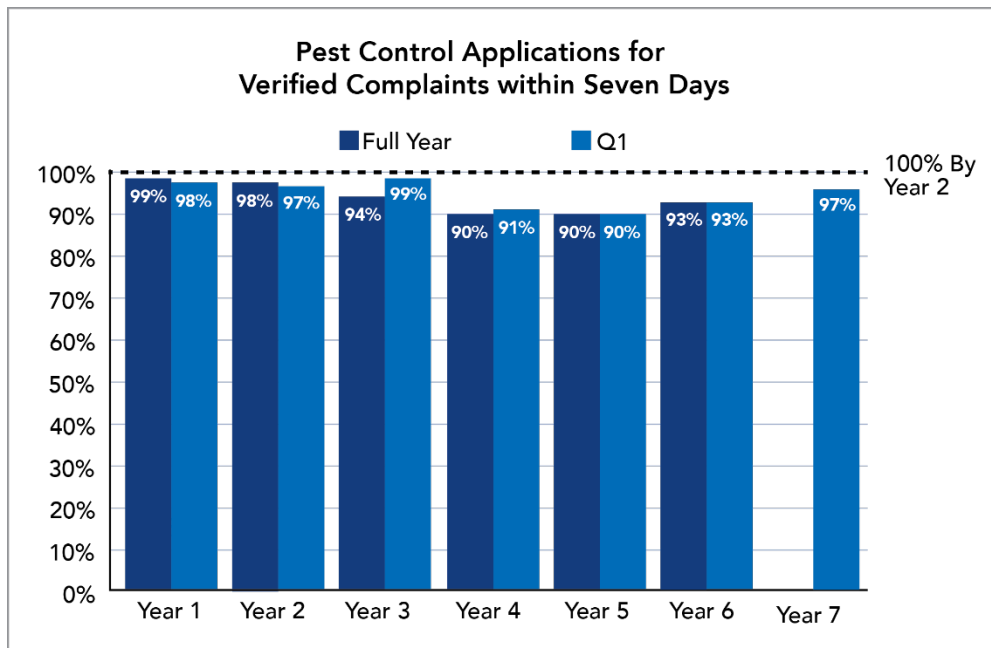
As discussed in prior reporting, NYCHA continues to train its staff and implement IPM techniques, leading to improved compliance and services for residents.⁷⁰ But more work remains. To fully comply with the HUD Agreement's IPM requirements, NYCHA must ensure that all staff consistently follow the **Pest Standard Procedure ("Pest SP")** and effectively apply IPM techniques. The subsections below provide an update on NYCHA's progress on 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.⁷¹ As of April 30, 2025, NYCHA did not comply with this requirement. But NYCHA improved its performance compared to the same period last year by four percentage points.

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 NYCHA to incorporate IPM practices into building operations at all developments and to send staff appropriately trained on IPM techniques to respond to all pest complaints.⁷²

In the first quarter of Year 7, NYCHA made progress toward meeting this requirement, but there is still more work to do. For instance, the Pest Management Department's in-house entomologist helped develop and update trainings for staff. The Pest Management Department is also implementing a program evaluation of the snap trap training it ran in December. The Monitors' consulting entomologists believe these efforts will lead to improved trainings, which in turn will lead to more widespread compliance with the Pest SP and IPM techniques.

Despite these efforts, the quality of pest management services remains uneven, and staff do not consistently implement IPM-based practices effectively in the field. For instance, the Monitors' consulting entomologist has observed exterminators performing inadequate apartment inspections and overlooking various areas or pest management steps.

To address this and other challenges, NYCHA continues to provide targeted training for exterminators, with a focus on improving resident communication skills so that exterminators can effectively explain the purpose of apartment inspections, address residents' concerns, and overcome objections to entry, thereby improving access rates. NYCHA has committed to several initiatives that the Monitors believe will advance this goal. The Pest Management Department is currently providing management and leadership training for Supervisors of Exterminators ("SOEs") to help them more effectively manage, educate, and hold staff accountable. In addition, as of May 27, 2025, the Pest Management Department and NYCHA's Learning and Development Department have created a roster of digital leadership courses, which SOEs will complete independently and then discuss in small groups. The Pest Management Department is also developing a mentorship program that will pair experienced exterminators with newer colleagues to provide individualized coaching and hands-on training.

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. 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.⁷³ 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.⁷⁴ For rat complaints in high-traffic areas, NYCHA must respond in an expedited manner.⁷⁵

For NYCHA and the Monitors to measure NYCHA's compliance with these response times, the terms "high-traffic areas" and "expedited manner" had to be defined. As of May 27, 2025, NYCHA and the Monitors agreed that "high-traffic areas" include playgrounds and parking lots.⁷⁶ The Monitors and NYCHA agreed that responding in an "expedited manner" means responding to 90% of rat complaints in high-traffic areas within two business days and to 100% of rat complaints in high-traffic areas within five calendar days. The Monitors and NYCHA are working to develop a reporting system so the Monitors can track NYCHA's compliance with those response times 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").⁷⁷ 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.⁷⁸

To facilitate compliance with this requirement, NYCHA committed to several capital projects aimed at improving its waste management capabilities.⁷⁹ These projects include building new waste yards and trash collection systems and replacing and upgrading the agency's waste collection and hauling equipment.⁸⁰

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

Consolidation: A group of developments managed by the same property management office.

NYCHA continues to measure compliance with the Waste Management Requirement through its Clean Compounds initiative, which requires **consolidations** to submit daily photographs of certain areas on development grounds and grounds supervisors to submit attestations to the Waste Management Department. To validate the consolidations' self-reported compliance, NYCHA's Waste Management Department launched Scorecard 1.5, a reporting system whereby Waste Management inspectors perform inspections of consolidations' common areas and grounds. In connection with Scorecard 1.5, the Waste Management Department launched a new reporting initiative to share the results of the inspections with developments. Waste Management now immediately shares a list of observed deficiencies that require corrective action with the respective development and instructs the consolidation to resolve the issues. Waste Management then provides the consolidation a score and information regarding the score that is based on inspectors' assessment of interior and exterior locations.

To assess compliance with the Waste Management Requirement and to supplement NYCHA's inspections, the Monitors' independent inspection team conducts inspections of NYCHA properties, covering grounds, including curbside collection points, short-term storage areas, waste yards, walkways, and common areas, including lobbies, elevators, and stairwells. During the first quarter of Year 7, the Monitors conducted 1,089 building and grounds inspections across 115 developments. The team has shared the results of the inspections with NYCHA property management to help improve compliance at the development level. The Monitors have also been sharing the high-level results of the inspections with

leadership in the Waste Management Department to help improve compliance agency-wide.

Based on these inspections, the Monitors conclude that NYCHA is in partial compliance with the Waste Management Requirement. The Monitors' inspectors found that most developments complied with the requirement, demonstrating good waste management practices, with properly managed short-term storage areas and well-maintained outside entranceways that were clean and free of obstructions. On the other hand, the Monitors' inspectors also observed some developments with issues such as uncontained trash and waste left behind after garbage removal, as well as liquid waste spills, particularly in outside walkways and curbside pickup zones. In addition, inspectors observed 340 malfunctioning garbage chute doors, leading to improper trash disposal and increasing the likelihood of pest infestations. These deficiencies were all shared with NYCHA through the Monitors' inspection reports.

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, the HUD Agreement required NYCHA to install 50 **rat slabs** by December 31, 2020.⁸¹ As of April 30, 2025, NYCHA has installed 40 rat slabs, with three installed at Wald Houses since the Monitors' April 2025 Report. NYCHA expects to complete the remaining ten rat slabs by October 2025.

In addition, NYCHA committed to additional waste management projects using funds provided by the **City Capital Action Plan ("CCAP")**.⁸² This includes installing 1,211 interior compactors at 92 developments and completing 113 waste yards at 83 developments by 2030.⁸³ As of April 30, 2025, NYCHA has installed 488 interior compactors and completed eight waste yards at seven developments.

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.

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 April 30, 2025, unless otherwise noted. The table categorizes each requirement as a one-time requirement (blue); occurrence requirement (yellow); response requirement (orange); or policy and practice requirement (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.	80%	NYCHA has installed 40 of 50 rat slabs as of April 30, 2025, and expects to complete 10 more rat slabs by October 2025.
Occurrence Metrics			
P8 (Ex. B ¶ 35)	Pest Population Publication: NYCHA shall publish reliable estimates of the pest populations at each NYCHA development on its website quarterly starting by July 31, 2019.	Not in compliance.	Now that reasonable protocols have been established, NYCHA is in the process of developing the infrastructure to report and publish reliable pest population estimates for each NYCHA development quarterly. NYCHA projects that publication will begin in April 2026.
P10 (Ex. B ¶ 37)	Pest Population Reduction Requirements II: Beginning in Year 5, NYCHA shall achieve a further	On track to comply; as of Q1 Year 7:	NYCHA has not yet met this requirement, as it is evaluated on an annual basis. However, NYCHA is on track to meet this requirement, and the

Req. No.	Description	Status	Compliance Details
	50% reduction of all pest populations.	Bed Bug - 96% Rat -85% Mouse -91% Cockroach - 95%	Monitors will report whether NYCHA meets the requirement at the end of Year 7 in future reporting.
P11 (Ex. B ¶ 45)	Waste Management: By July 31, 2019, 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.	Partial compliance	Based on the Monitors' independent inspections, NYCHA is in partial compliance with the Waste Management Requirement due to overall improvement across developments. However, NYCHA's performance continues to be inconsistent, and some developments still show deficiencies.
Response Metrics			
P14 (Ex. B ¶ 39(a))	Rat Response II: Beginning in Year 5, NYCHA shall respond to (i) 90% of all rat complaints within two business days	In compliance. (i): 99% (ii): 100%	Although NYCHA did not meet these requirements by January 31, 2024, as of April 30, 2025, NYCHA complies with both requirements.

Req. No.	Description	Status	Compliance Details
	and (ii) all rat complaints within five calendar days.		
P15 (Ex. B ¶ 39(b))	Other Pest Response II: Beginning in Year 5, NYCHA shall respond to 90% of all other pest complaints within seven calendar days and to all other pest complaints within ten calendar days.	Partial compliance. (i): 91% (ii): 97%	Although NYCHA did not meet these requirements by January 31, 2024, as of April 30, 2025, NYCHA complies with the first requirement and nearly complies with the second.
P16 (Ex. B ¶ 38(c))	Effective Pest Control Application: By January 31, 2021, NYCHA shall apply effective pest control methods to address complaints within seven calendar days.	Not in compliance 97%	NYCHA does not yet comply with this requirement.
Policy and Practice Requirements			
P18 (Ex. B ¶ 43)	IPM Practices: By January 31, 2020, NYCHA shall incorporate industry standard IPM practices into building operations in all developments.	In progress	NYCHA has improved its pest management practices and upgraded and expanded its trainings. However, NYCHA does not yet consistently and/or effectively use IPM practices in building operations

Req. No.	Description	Status	Compliance Details
			across all developments.
P19 (Ex. B ¶ 44)	IPM Training: By January 31, 2020, NYCHA shall send staff appropriately trained on IPM to respond to any pest complaint.	In progress	NYCHA has developed a training program that 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.⁸⁴ 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.⁸⁵

The subsections below provide an update on NYCHA's compliance with the outstanding mold and leak requirements under the HUD Agreement as of April 30, 2025, as well as information about mold-related capital projects.

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").⁸⁶

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.⁸⁷

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**.⁸⁸

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.

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.

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.

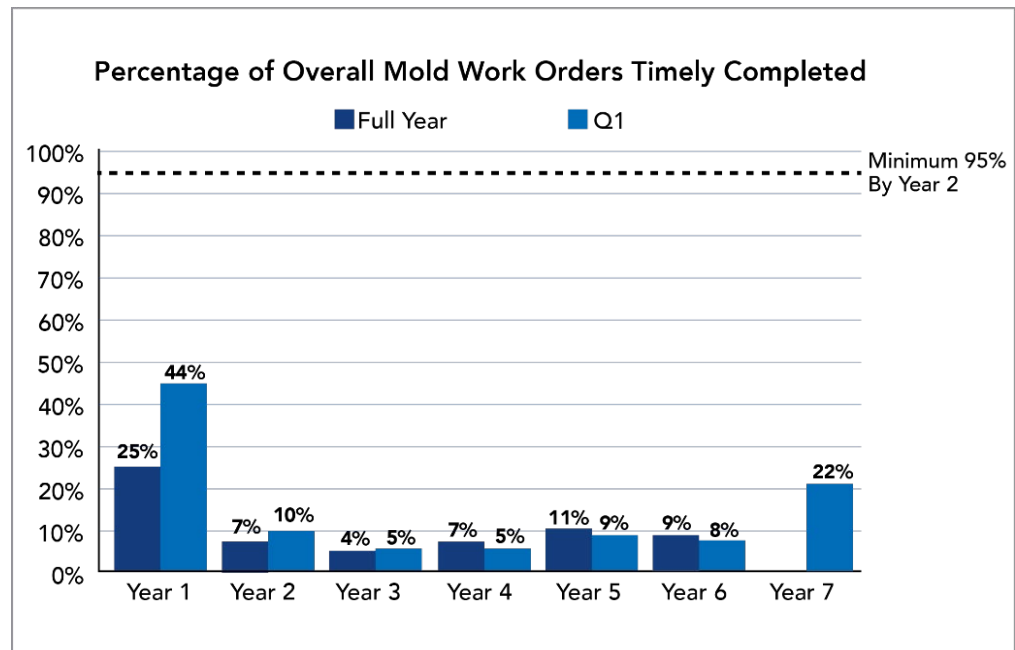
Application of Mold-Resistant Paint: To prevent recurrence, antimicrobial, mold-resistant paint is applied to walls after mold is removed.

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

NYCHA remains out of compliance with the Response-Time Requirements but has significantly improved in the first quarter of 2025.

a. Blended Rate

As illustrated in the graph below, NYCHA is substantially out of compliance with the blended rate. NYCHA complied with the blended requirement 22% of the time. This is a 14% improvement compared to the first quarter in Year 6.

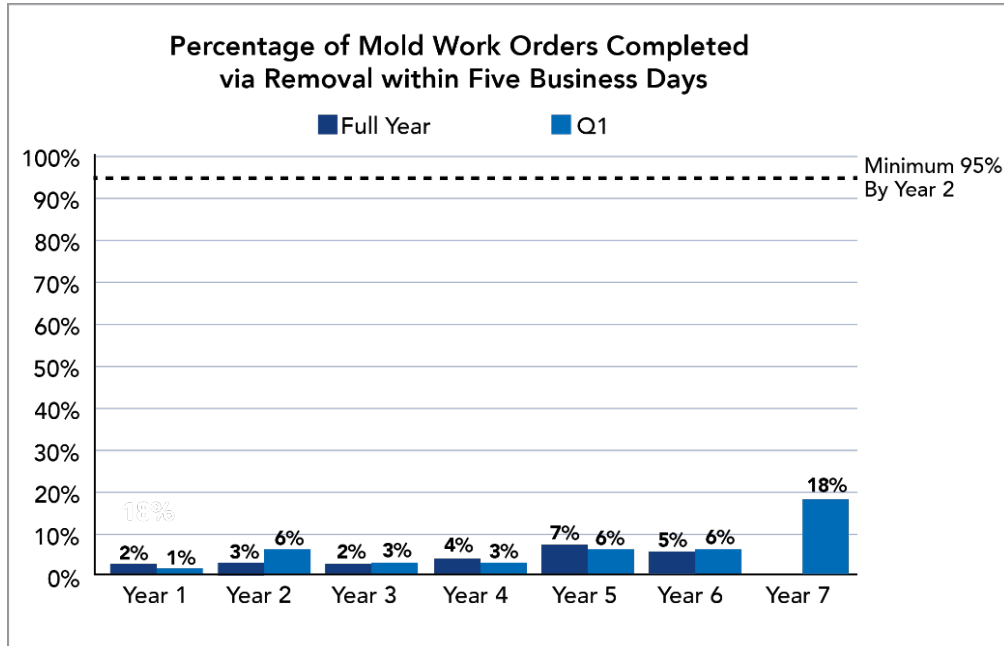


The following subsections set out NYCHA’s performance meeting the mold removal and remediation timeframes that make up the blended rate.

b. Mold Removal

When NYCHA complies with the HUD Agreement via mold removal, it must remove mold within five business days of a resident’s mold complaint.⁸⁹ Mold removal consists of three steps: **mold cleaning**, **fixture removal**, and **application of mold-resistant paint**.

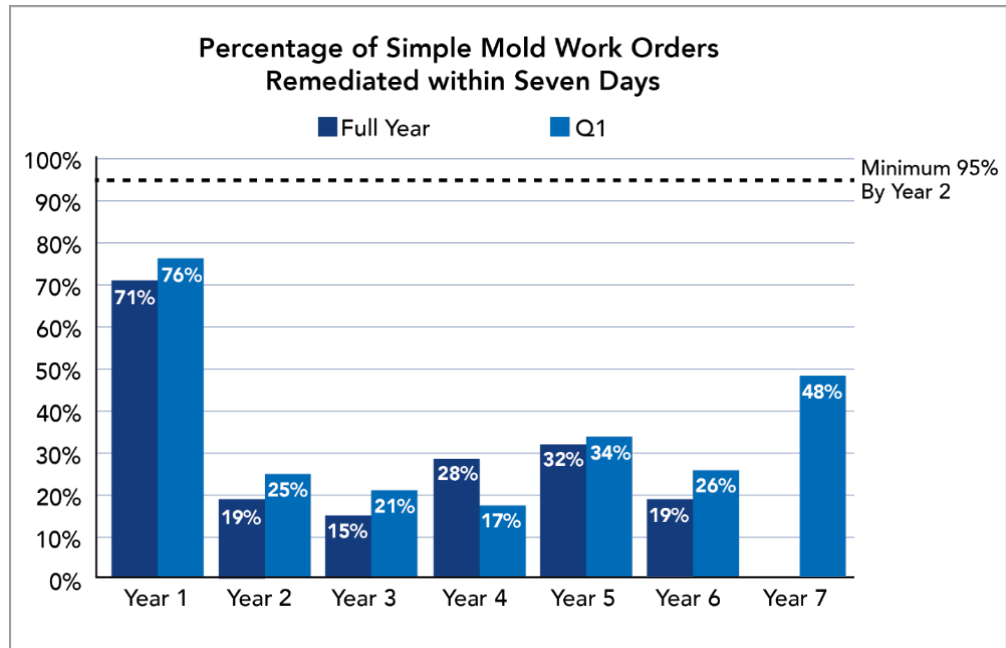
As illustrated in the graph below, NYCHA removed mold within five business days of a resident's mold complaint 18% of the time in the first quarter of Year 7. This is a significant improvement compared to 6% achieved in the first quarter in Year 6.



c. Simple Repairs

When NYCHA complies with the HUD Agreement via simple repair, NYCHA must perform the repair within seven days of a resident's complaint.⁹⁰

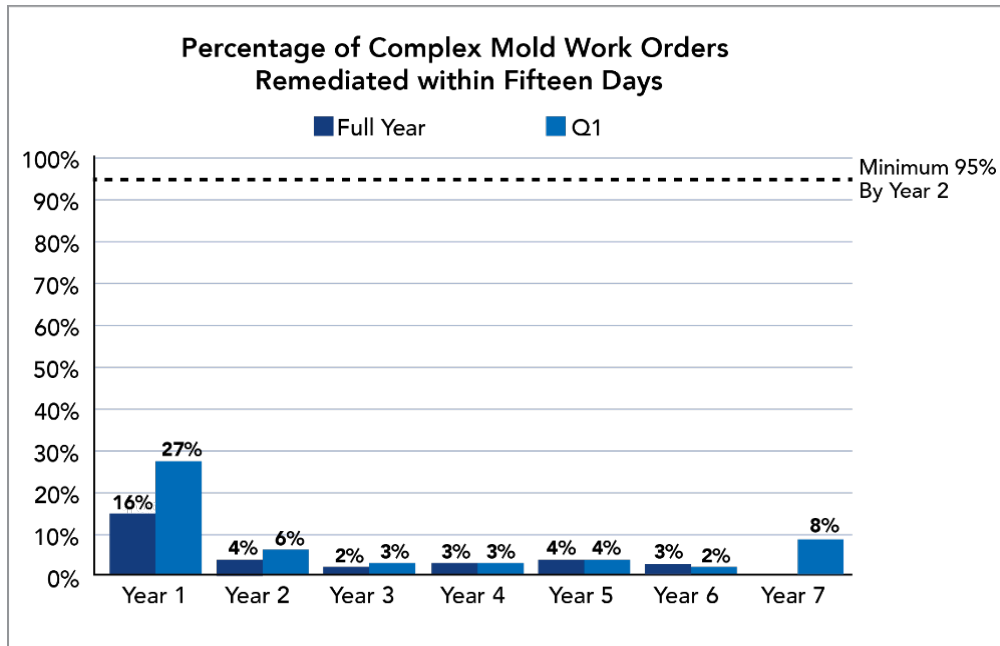
As illustrated in the graph below, NYCHA remediated mold and its root cause(s) via simple repair within seven days 48% of the time in the first quarter of Year 7. This is a significant improvement compared to 26% achieved in the first quarter in Year 6.



d. Complex Repairs

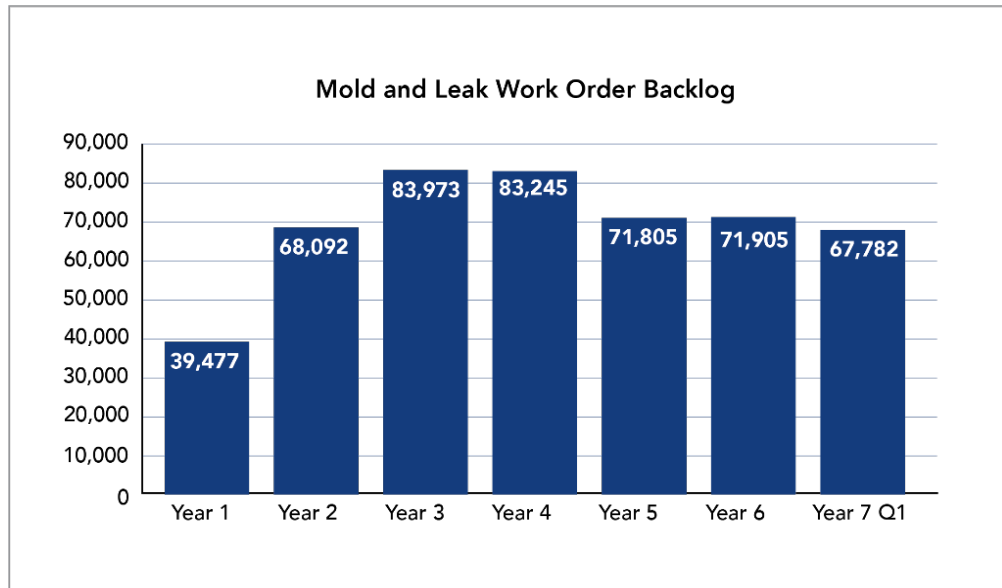
When NYCHA complies with the HUD Agreement via complex repair, NYCHA must perform the repair within 15 days of a resident's complaint.⁹¹

As illustrated in the graph below, when NYCHA remediated mold and its root cause(s) via complex repair, it did so within 15 days 8% of the time in the first quarter of Year 7. This is an improvement compared to 2% achieved in the first quarter in Year 6.



e. **Mold and Leak Work Order Backlog**

NYCHA has approximately 68,000 open mold and leak parent and child work orders, which NYCHA refers to as the mold and leak backlog.⁹² The backlog includes different types of work orders related to mold and leak issues, and the substantial majority of these work orders are generated in response to resident complaints. NYCHA's work order closure rules prevent NYCHA from closing mold parent work orders until all the corresponding child work orders—which are work orders associated with the different components of mold cleaning or repair work such as painting, plastering, or plumbing—are closed. The open child work orders include addressing active mold or health and hazard conditions, as well as related work, such as painting, that must be completed after the mold or leak issue is addressed. As illustrated in the graph below, the backlog had 67,782 work orders by the first quarter of Year 7.⁹³ This is a decrease of 4,123 work orders compared to the end of Year 6.



The mold and leak backlog is a significant constraint that makes it more difficult for NYCHA to comply with the mold removal and remediation requirements. Simply put, it reflects that NYCHA has more mold and leak issues to address than it has staffing to address them. With its current staffing, NYCHA is close to being able to complete these orders at the pace at which they come in. However, because of the substantial backlog, residents must wait too long to have their mold and leak issues corrected. Lengthy wait times are one of the most common complaints that the Monitors hear from residents.

Given the urgent need to improve compliance with the HUD Agreement requirements related to mold and leak remediation, NYCHA, SDNY, HUD, and the Monitors worked collaboratively to develop an initiative to address the worst mold and leak conditions. The program will target mold and leak work orders older than 100 days at 12 high-need consolidations. To complete the work, NYCHA will hire and train 34 supplemental skilled trades staff. NYCHA anticipates starting work on the first group of consolidations in September 2025.

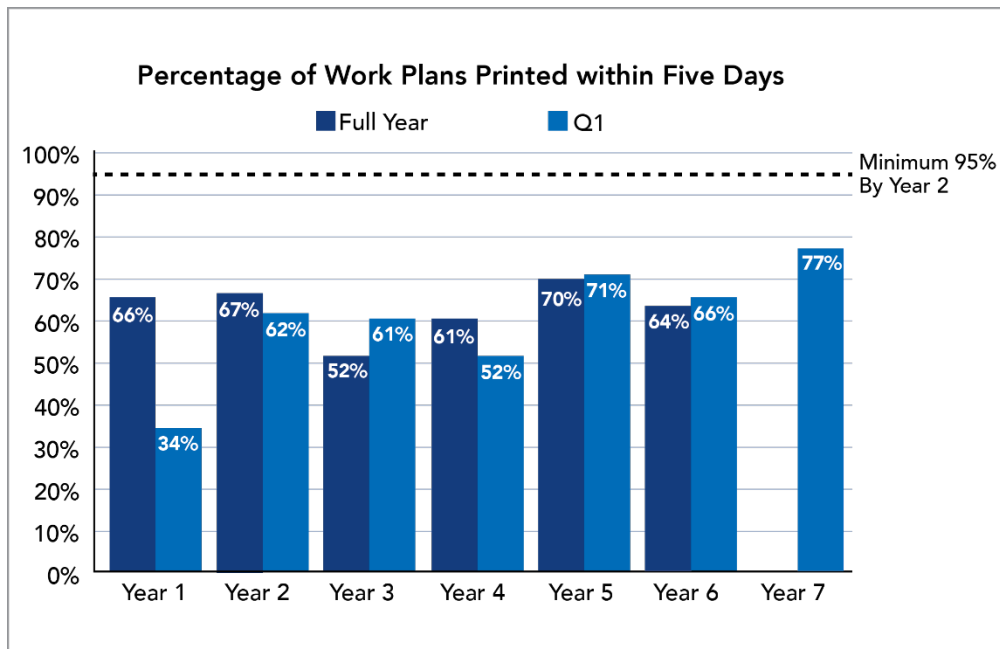
The Monitors will continue to collaborate with NYCHA so that funding for this project is expended efficiently and so that this initiative focuses on reducing the mold and leak work order backlog and materially improving conditions in the highest-need apartments.

2. Work Plan Distribution (Requirement No. M5)

Under the HUD Agreement, NYCHA must provide a resident with a **work plan**—a written document 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.⁹⁴ 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 approved by the First Monitor. 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.⁹⁵

As illustrated in the graph below, NYCHA printed work plans within five business days 77% of the time in the first quarter of Year 7 as compared to 66% of the time in the first quarter of Year 6. This marks an 11% improvement over the first quarter of Year 6.



NYCHA notes that it experienced a technical problem with printing the work plans in April 2025 that reduced the measured compliance rate. The issue has since been resolved and NYCHA anticipates that its compliance will increase in future reporting periods as a result. In addition, the Monitors are exploring with NYCHA whether the agency can adopt a revised procedure so that

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 Standard Procedure, a work plan is automatically generated following a verified mold inspection.

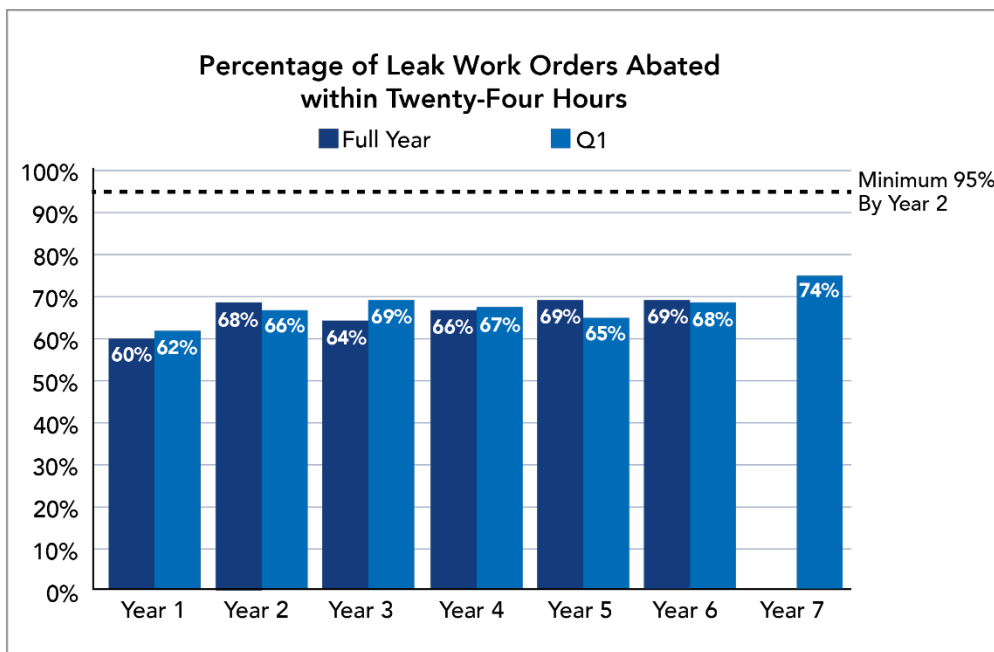
Mold Inspector: A mold inspector is a Property Maintenance Supervisor, Assistant Property Maintenance Supervisor, Property Manager, or Maintenance Worker who is trained and authorized to perform initial mold inspections. A mold inspector must complete the Mold Inspector and Building Sciences Trainings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

the resident receives information regarding the work plan as soon as the mold inspection is completed, as compared to when the printed work plan is mailed to them.

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 resident's complaint.⁹⁶ NYCHA must also remove any resulting standing water within 48 hours of a resident's complaint at least 95% of the time.⁹⁷

As illustrated in the graph below, NYCHA abated floods, leaks from above, and Other Moisture Conditions within 24 hours 74% of the time in the first quarter of Year 7 as compared to 68% of the time in the first quarter of Year 6.



To improve its performance, NYCHA is implementing initiatives to address structural issues (such as badly corroding pipes and water lines), increase staffing, and enhance the training provided to its personnel. NYCHA is addressing the structural issues through large-scale repairs like the comprehensive modernization program,

and the Building Line and Waste Line Initiatives, each of which is discussed below in this section of the Report. NYCHA is focusing on improving the quality of its response to leaks through the **leak standard procedure ("Leak SP")**, which will improve training and standardize workers' responses to leaks.

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 needs to first implement the Leak SP before it can measure and report on its fulfillment of this requirement.⁹⁸

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). 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.⁹⁹

NYCHA published the Leak SP on May 20, 2025. NYCHA will begin training workers on the Leak SP and has provided the Monitors with a roll-out plan for implementing the Leak SP city-wide, starting with developments in Queens and Staten Island.¹⁰⁰

Together with the **Independent Mold Analyst ("IMA")** and the **Independent Data Analyst ("IDA")**, the Monitors will continue to support the Leak SP roll-out and development of supplemental Leak SP training materials.

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").¹⁰¹ The following subsections set out NYCHA's progress in meeting the Occurrence Requirements.

Leak Standard Procedure ("Leak SP"):

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

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 quarterly basis. The IMA also reports on its findings and makes recommendation for improved compliance.

Independent Data Analyst ("IDA"):

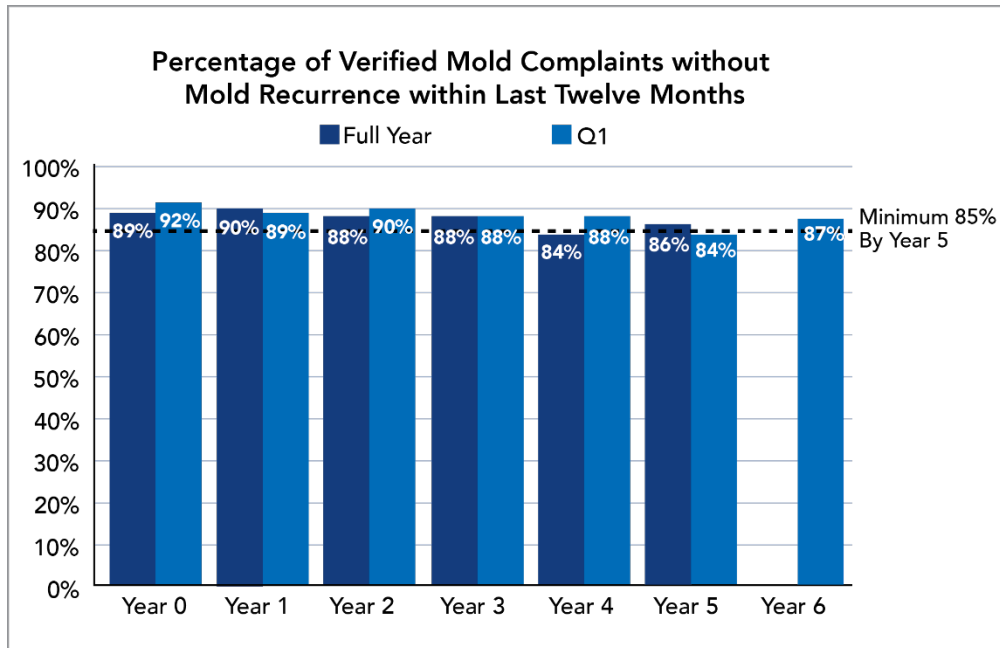
The IDA is an entity appointed under Baez Consent Decree to help the parties and Special Master develop a reporting system to track NYCHA'S compliance with its obligations under Baez. The IDA is also tasked with reviewing and confirming the accuracy of the reporting and recommending improvements.

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.¹⁰² 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.

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 first quarter of Year 6, which ended on April 30, 2024, 87% of verified mold complaints did not have Recurring Complaints. This means that from May 1, 2024, up to and including April 30, 2025, 87% of verified mold complaints did not have Recurring Complaints. Accordingly, data for mold complaints first verified during Year 7 will not be available until Year 8 because this HUD Agreement provision measures Recurring Complaints that occur during the following 12 months.

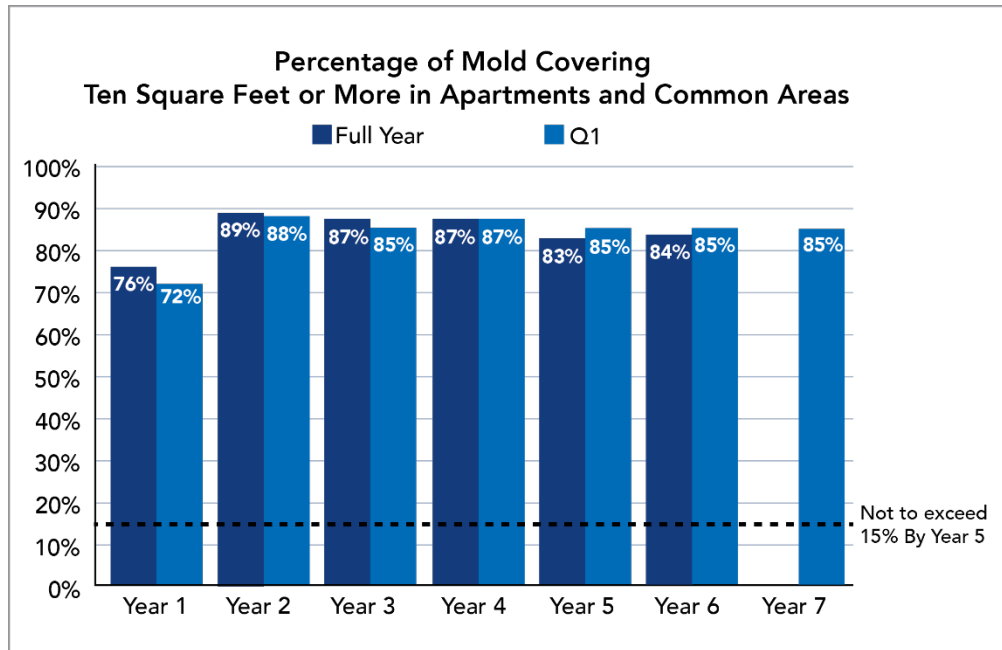
As illustrated in the graph below, NYCHA complied with this requirement in the first quarter of Year 6 and improved upon its performance from the first quarter of Year 5. Year 0 represents the year before the outset of the monitorship in 2019 (i.e., February 1, 2018 to January 31, 2019). The graph below identifies apartments, common area rooms, or hallways where mold was first identified during that year and then experienced a Recurring Complaint during the following 12 months.



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

Under the HUD Agreement, no more than 15% of verified mold complaints may be for mold covering ten or more square feet ("Large Mold Growths").¹⁰³

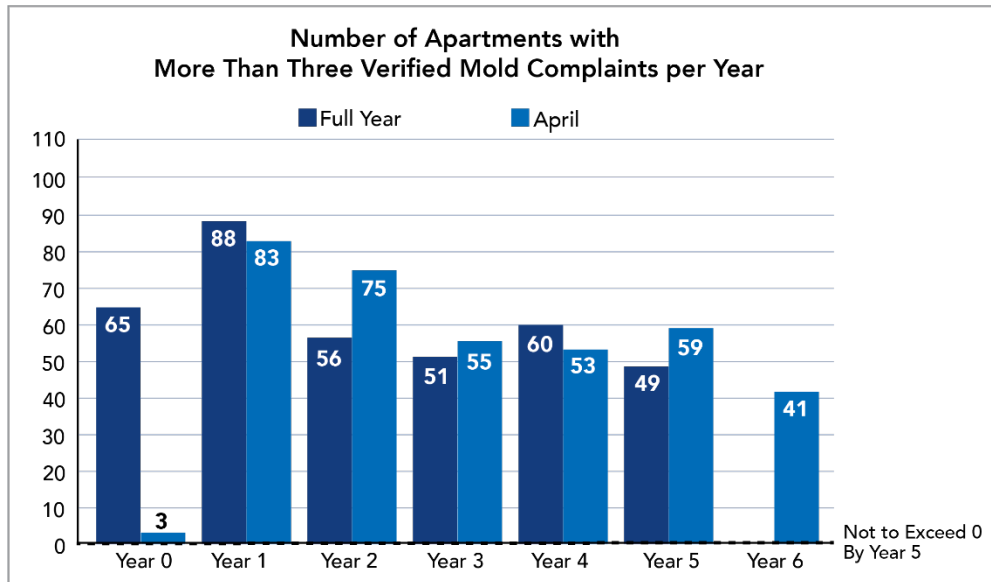
As illustrated in the graph below, NYCHA remained substantially out of compliance with this requirement in the first quarter of Year 7, reporting that 85% of verified mold complaints were for Large Mold Growths. As discussed in previous reports, there are several possible reasons for the high rate of Large Mold Growths, including aging infrastructure, delayed resident reporting, and NYCHA workers overestimating the sizes of mold growths.¹⁰⁴ The Monitors are still looking into the underlying data to evaluate the causes of these large mold growths and will provide updates in future reporting.



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.¹⁰⁵ 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.

In the first quarter of Year 6, there were 41 apartments with more than three verified mold complaints as compared to 59 apartments in Year 5.¹⁰⁶



4. Mold-Related Capital Projects

As discussed in previous reporting, NYCHA's Comprehensive Modernization ("Comp Mod") and Building Line Initiative ("BLI") programs address infrastructural causes of mold growth and recurrence.¹⁰⁷ The Comp Mod program provides for large-scale renovations, including roof and façade repairs, plumbing replacements, ventilation upgrades, and kitchen and bathroom renovations, to resolve recurrent leaks and moisture at select NYCHA developments.¹⁰⁸ The BLI program provides for renovations to specific apartment lines in buildings by replacing high-leak plumbing lines that frequently impact apartments and common areas.¹⁰⁹ The Monitors are currently evaluating NYCHA's proposal to reallocate funding in the City Capital Action Plan ("CCAP") to create a Waste Line Initiative, which seeks to build on the successes of the BLI program with respect to plumbing waste lines. 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.

a. Comprehensive Modernization

Since the Monitors' December 2024 Report, NYCHA has continued to advance key Comp Mod projects. At Todt Hill Houses, construction is progressing on schedule toward the targeted completion date of March 30, 2028. Residents have been relocated from the development's two tower blocks and are able to tour model

units.¹¹⁰ Renovation work is underway in several apartments, following demolition and coordination with Con Edison to support necessary utility upgrades.¹¹¹

At Saint Nicholas Houses, the project has experienced a cumulative 14-week delay, reflecting an additional 8-week delay since the Monitors' December 2024 report.¹¹² NYCHA attributes the delay to the design-build vendor's decision to confirm all subcontract prices before beginning construction. While this approach has impacted the timeline, it reflects a measured effort to ensure budget certainty under NYCHA's fixed-price contract structure. NYCHA is actively working with the contractor to manage the schedule and maintain momentum. Construction completion is projected for October 30, 2029.

b. 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.¹¹³ NYCHA has selected Carlton Manor for its next BLI project and is currently in the scoping and pre-design phase.

At Tompkins Houses, NYCHA has secured an electrical subcontractor, and construction is on track to be completed in December 2025. At Red Hook East Houses, NYCHA has begun the scope development process and plans to begin relocating residents this summer. NYCHA will provide an updated timeline once it has completed the resident relocation process but currently anticipates that it will complete construction on this project by the end of 2026.

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

Under the HUD Agreement, NYCHA must comply with the terms of court orders entered in *Baez*, a federal class action lawsuit brought by NYCHA residents suffering from asthma and living in apartments with mold and excessive moisture.¹¹⁴

As of April 30, 2025, NYCHA remains out of compliance with the court orders in *Baez*, which NYCHA also acknowledges.

The Monitors will continue to collaborate with the IMA, IDA, and *Baez* Plaintiffs to address NYCHA's mold and leak issues in a coordinated manner.¹¹⁵

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 October 31, 2024, unless otherwise noted. The table categorizes each requirement as an Occurrence Requirement (yellow); Response-Time Requirement (orange); or Policy and Practice Requirement (green). Completed requirements are listed in Appendix A.

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: 87% (as of the end of the first quarter of Year 6)	NYCHA is compliant with this requirement. As of the end of the first quarter of Year 6, 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: 85% (in the first quarter of Year 7)	NYCHA is not compliant with this requirement. In the first quarter of Year 7, 85% 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: 41 Apartments (as of the end of the first quarter of Year 6)	NYCHA is not compliant with this requirement. As of the end of the first quarter of Year 6, mold appeared more than three times in a 12-month period in 41 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: 77% (in the first quarter of Year 7)	NYCHA is not compliant with this requirement. In the first quarter of Year 7, NYCHA provided residents with a work plan within five business days 77% 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 or (2) remediate the mold and its underlying root cause(s) within seven days for simple repairs or (3)	Not in compliance: 22% (in the first quarter of Year 7)	NYCHA is not compliant with this requirement. In the first quarter of Year 7, NYCHA addressed verified mold complaints within the timeframes specified by the HUD Agreement 22% of the time

Req. No.	Description	Status	Compliance Details
	remediate the mold and its underlying root cause(s) within 15 days for complex repairs.		
M7 (Ex. B. ¶ 17(c))	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.	(1) Not in compliance: 74% (2) Not currently measured	(1) NYCHA is not compliant with this requirement. In the first quarter of Year 7, 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 74% of the time. (2) Because the Leak SP has not yet been implemented, NYCHA does not currently measure whether the agency removes standing water within 48 hours.
Policy and Practice Obligations			
M8 (Ex. B. ¶ 20)	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.	Not in compliance	NYCHA reports, and the IDA and IMA confirm, that as of October 31, 2024, 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.¹¹⁶ The Agreement ultimately requires NYCHA to abate all lead-based paint in its developments by 2039.¹¹⁷ The subsections below provide an update on NYCHA's progress toward compliance with the outstanding lead-related obligations during the first quarter of Year 7.¹¹⁸ Agreement obligations that NYCHA has completed may be found in Appendix A.

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 2039.¹¹⁹ To identify the complete universe of apartments containing lead-based paint and requiring abatement, NYCHA has undertaken a robust campaign to conduct **X-Ray Fluorescence ("XRF") testing** in all apartments not previously tested at the current NYC definition of lead paint (0.5 mg/cm²).¹²⁰ As described further below, NYCHA continues to make significant progress towards identifying and abating the remaining universe of apartments with lead-based paint.

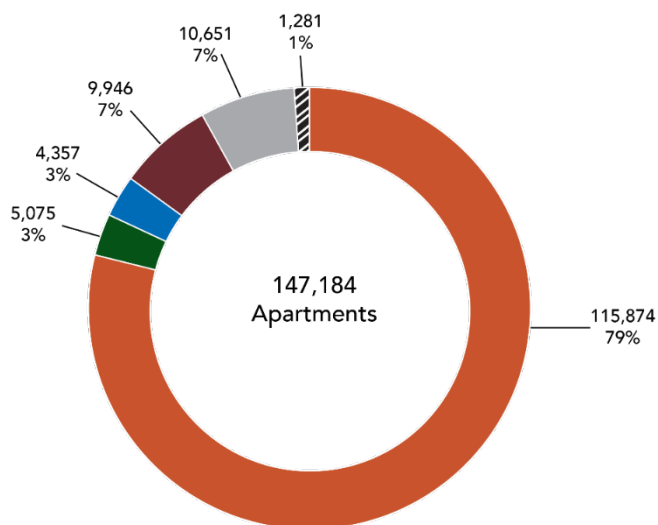
X-Ray Fluorescence ("XRF") Testing: XRF testing is a non-destructive analytical technique that uses X-rays to determine the elemental composition of a material, including to determine whether lead is present.

1. XRF Testing in Apartments

As previously reported, NYCHA completed Phase One¹²¹ of its XRF testing initiative, which was focused on apartments where children under age six live and spend time ("CU6 Apartments"). In the first quarter of Year 7, NYCHA continued its progress on Phase Two of the initiative. According to NYCHA's data and as illustrated in the graphs below, NYCHA has tested or attempted to test 135,252 apartments across both Phases as of April 30, 2025.¹²² Of those, NYCHA completed testing in 115,874, or 79%, of the apartments. NYCHA identified lead-based paint in 52,426, or 45%, of those apartments and found no lead-based paint in 63,448, or 55%, of those apartments.

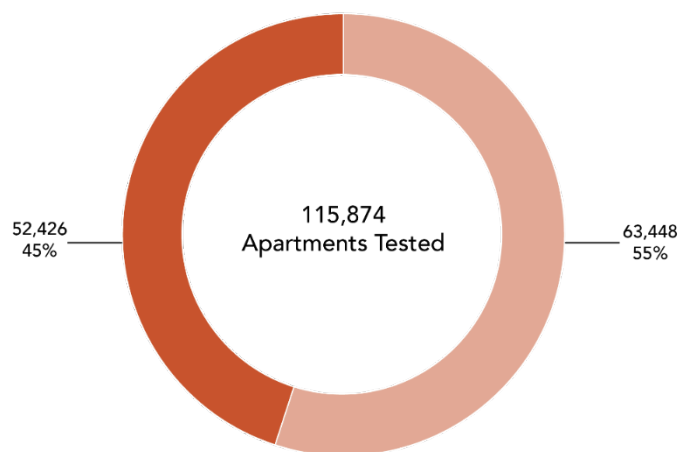
Phase 1 and 2 XRF Testing Progress for Apartments

- Apartments Where Testing Complete
- Apartments Pending QA
- Apartments Completed Pending Report Submission
- Apartments Attempted With No Access
- Apartments Not Attempted
- Apartments Decommissioned, RAD/PACT or Currently Off Rent Roll



Phase 1 and 2 XRF Testing Results for Apartments

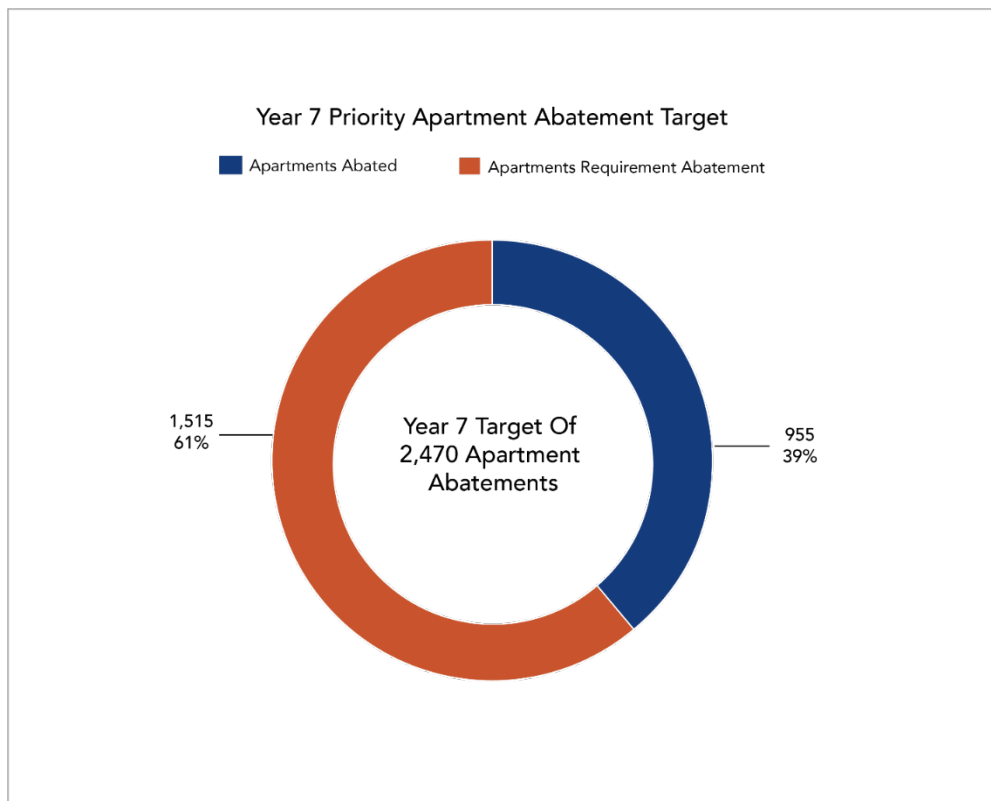
- Apartments Tested with Negative Result
- Apartments Tested with Positive Result



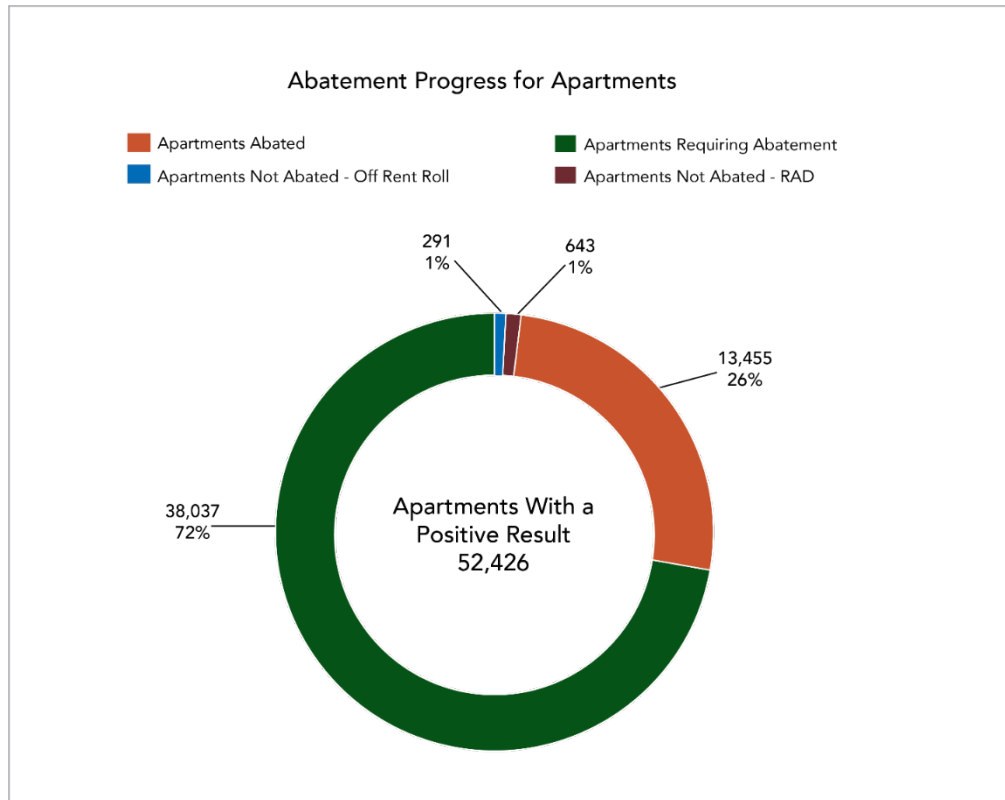
NYCHA reports that it expects to complete substantially all XRF testing by the end of the third quarter of 2025 and plans to spend the fourth quarter of 2025 returning to any apartments that it could not access.¹²³

2. Abatement in Apartments

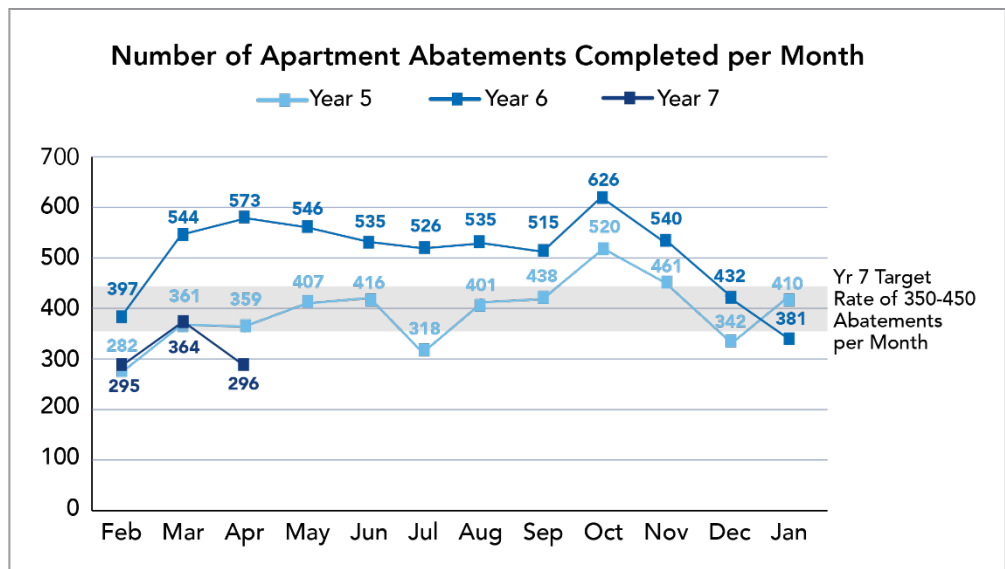
NYCHA continues to make progress towards abating apartments that have tested positive for lead-based paint. As illustrated by the graph below, NYCHA abated a total of 955 apartments in the first quarter of Year 7.¹²⁴ This is strong progress toward achieving NYCHA's Year 7 goal of 2,470 abatements, which will bring NYCHA to a total of 15,000 apartments abated.



As illustrated in the graph below, as of the end of the first quarter of Year 7, NYCHA has abated a total of 13,455 apartments, approximately 26%¹²⁵ of the known universe of apartments with lead-based paint.¹²⁶



Finally, as illustrated in the graph below, NYCHA's monthly rate of abatement in the first quarter of Year 7 declined compared to the same period in the previous year.¹²⁷

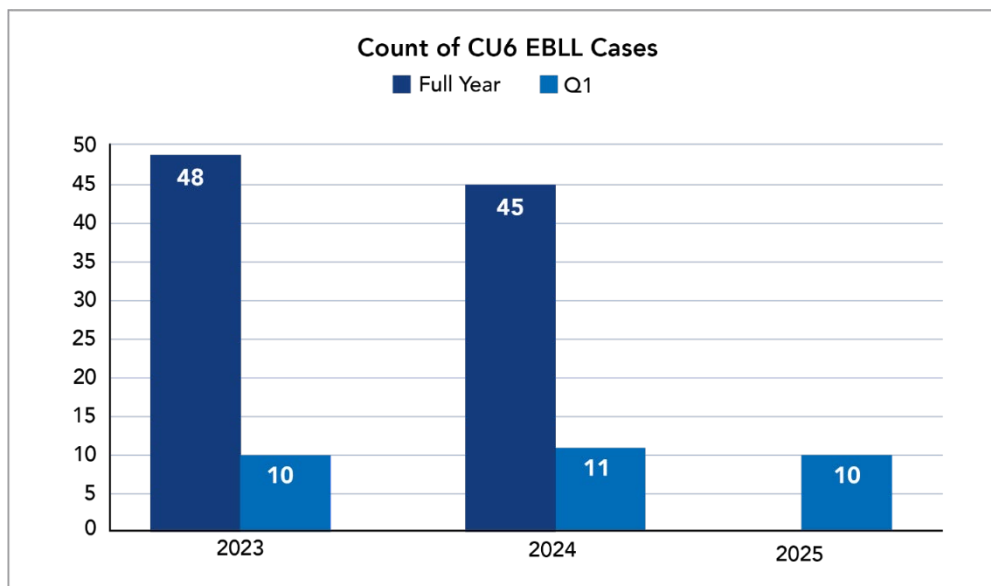


Based on abatement totals to date and NYCHA's current rate of abatement, NYCHA appears to be on track to meet its Year 7 priority to abate 15,000 total apartments by the end of Year 7, as well as on track to meet the HUD Agreement obligation to abate 50% of apartments in need of abatement by the end of 2029.¹²⁸

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 **elevated blood lead level ("EBLL")** in its developments.¹²⁹ In the first quarter of 2025, ten EBLLs connected to NYCHA properties were reported, as compared to ten and 11 in the first quarters of 2023 and 2024, respectively. During the first quarter of 2025, NYCHA was in compliance with its Agreement requirements to notify the Monitors and the U.S. government of any Commissioner order to abate ("COTA") in connection with an EBLL and to complete the associated abatement within 30 days.¹³⁰ On average, NYCHA completed the abatement process within 18 days of receiving a confirmed EBLL for a child under six in the first quarter of 2025.

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.



C. Testing and Abatement of Childcare Centers

As reported in the Monitors' March 2025 Report and in response to an increase in EBLLs originating from childcare centers located within NYCHA properties, NYCHA has committed to

prioritizing childcare centers as the next phase of its comprehensive XRF testing initiative. Since the Monitors' March 2025 Report, NYCHA received notice of an additional EBLL in the Berry Houses childcare center on April 4, 2025, which NYCHA has since abated and authorized for reopening on May 8, 2025.

In furtherance of its childcare center focused testing initiative, NYCHA has begun reviewing its full property portfolio to identify the complete universe of childcare centers operating on its properties, as well as to conduct an assessment to prioritize testing of those centers. In doing so, NYCHA is considering whether a center is actively occupied, is providing programming geared toward children under age six, and whether the center was built before 1978. Currently, NYCHA is in the process of sending personnel to all of its properties to confirm how many of these centers are active childcare centers and evaluate the centers for purposes of prioritizing testing and abatement. NYCHA plans to establish the final list of childcare centers on its properties by the end of the second quarter of 2025. NYCHA reports that it will finalize its testing plan by the third quarter of 2025. The Monitors will report on progress towards this effort in a future report.

In connection with NYCHA's annual visual assessment process, NYCHA will also create work orders for each center that meets the criteria requiring annual visual assessments by the end of the second quarter of 2025. The visual assessments will begin during the second quarter of 2025 and take place concurrently with the apartments and common areas at each development. Remediation of any positive components identified will begin immediately after the finding.

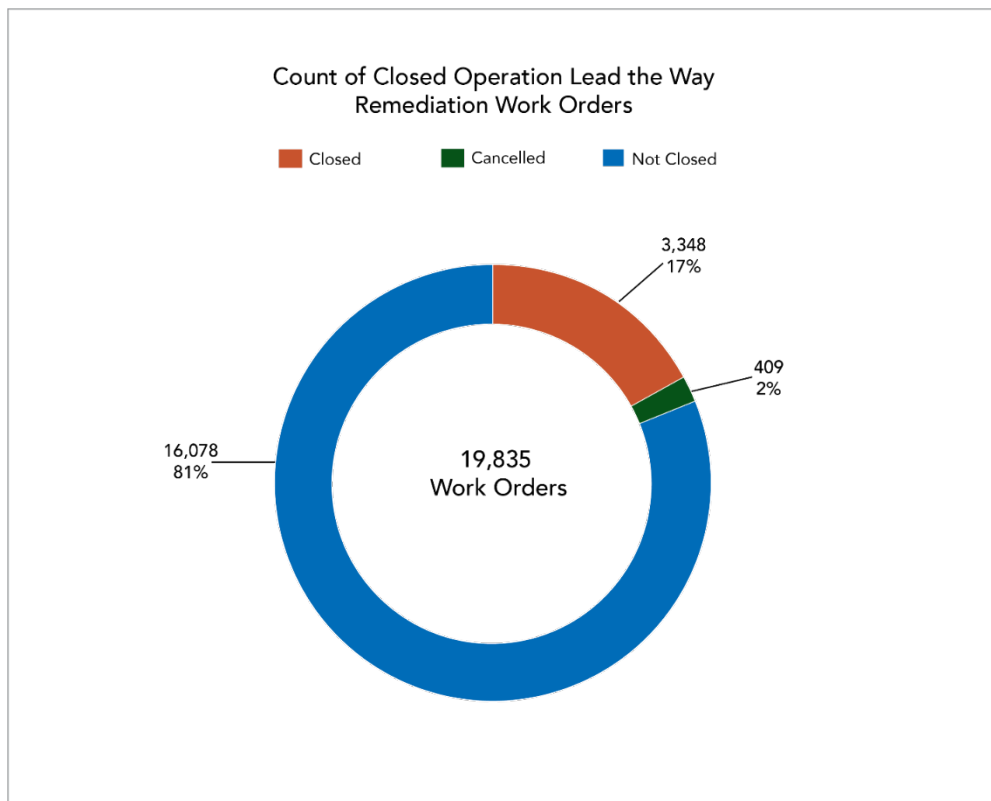
Finally, NYCHA is working towards identifying other common areas and commercial areas that may pose heightened risks to children under age six, such as outdoor playgrounds. The Monitors will report on progress towards this effort in a future report.

D. 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.¹³¹

As of April 30, 2025, NYCHA has not begun conducting visual assessments for 2025, but plans to do so in the second quarter of 2025.

NYCHA conducts paint remediation stemming from deficiencies identified through visual assessments and XRF testing. As previously reported, NYCHA has a backlog of paint remediation work orders that has accumulated since 2022, which it is prioritizing based on the level of risk posed to NYCHA residents. In December 2024, NYCHA identified 19,835 work orders from this backlog that it will endeavor to close in Year 7. As of April 30, 2025, NYCHA has closed 3,346 (17%) of these work orders.¹³²



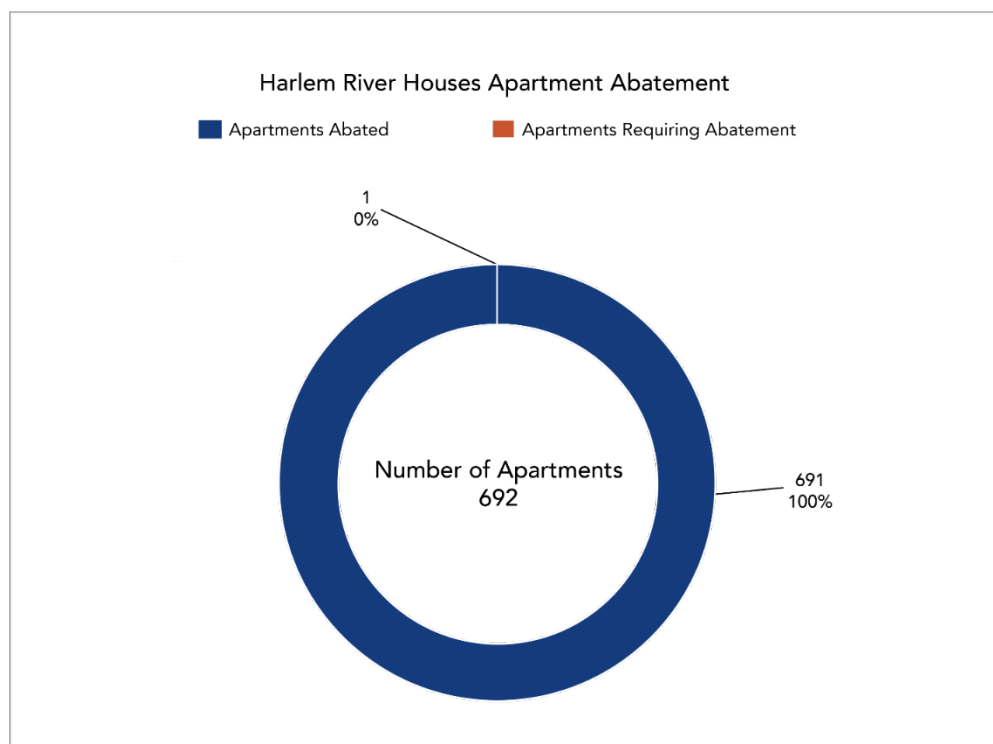
The Monitors will continue to support NYCHA as it endeavors to clear its backlog of remediation work orders and continues to improve the pace at which it completes paint remediation work orders.

E. Ensuring PACT Partner Compliance with Abatement Requirements (Requirement Nos. L6, L20-22, L-36) (abatement deadlines); (Requirement No. L26) (regulatory requirements for conducting abatement)

The HUD Agreement required NYCHA to ensure two recently converted PACT developments known to have particularly high levels of lead—Harlem River Houses and Williamsburg Houses—were completely abated by January 31, 2024.¹³³

As of the close of Year 6, NYCHA and its PACT partners reported the completion of the abatement of applicable apartments and common areas at Williamsburg Houses. NYCHA recently identified that the lead abatement plan for Williamsburg did not require abatement for exterior common areas (as opposed to adopting more limited internal controls which protect residents from the harms of lead paint on a more temporary basis). Because NYCHA requires PACT partners to abate all lead paint, NYCHA reports that it is working with the PACT partner to retest the exterior common areas at the 0.5 mg/cm² level, originally tested at 1.0 mg/cm², and to finalize a schedule to complete the abatement of the exterior common areas.

As of the close of the first quarter of Year 7, NYCHA and its PACT partners have completed abatement of 99% of the apartments requiring abatement at Harlem River Houses.



NYCHA reports it anticipates completing abatement at Harlem River Houses in the second quarter of 2025.¹³⁴

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 status of NYCHA's compliance with the outstanding requirements of the HUD Agreement as of the end of April 30, 2025, unless otherwise noted. The table categorizes each requirement as a One Time Requirement (blue), Occurrence Requirement (yellow); Response-Time Requirement (orange); or Policy and Practice Requirement (green):

Req. No.	Description	Status	Compliance Details
One-Time Requirement			
L6 (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, NYCHA's PACT partners did not abate all lead-based paint by the target deadline. NYCHA has since completed abatement of all apartments and interior common areas at Williamsburg and is developing a plan to abate the exterior common areas at Williamsburg. NYCHA estimates 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	Not due	NYCHA reports that it is abating apartments with lead-based paint at a rate of

	contain lead-based paint and interior common areas that contain lead-based paint in the same building as those apartments by January 31, 2029.		approximately 300-400 apartments per month. If NYCHA maintains its current rate of abatement, the agency may meet the target 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 exterior common areas that contain lead-based paint and prioritizes common areas posing a higher risk of exposure to children.	Incomplete	NYCHA has not yet developed a formal plan related to exterior common areas.
Response Obligations			
L23 (Ex. A ¶ 23)	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.	In compliance	
L24 (Ex. A ¶ 25)	EBLL Abatement Orders: Report to the Monitor 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.	In compliance	
L25 (Ex. A ¶ 26)	Environmental Investigations: To the extent the NYC Department of Health and Mental Hygiene	Substantial compliance	

	Commissioner has not performed an environmental investigation of any apartment in which a child with an EBLL has been reported 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	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

	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 Rule, 40 C.F.R. part 745, subpart E.		these rules, although NYCHA is developing a path towards compliance, consistent with the guidance provided by HUD in November 2024.
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	In compliance	NYCHA completed the biannual risk assessment reevaluations in 2024. It is in process of following up on properties that failed.

	lead-based-paint maintenance and reevaluation activities.		
L31 (Ex. A ¶ 27)	Lead Disclosures to New Residents: Provide residents signing new leases (or, where required by regulations, renewal leases) with information about the presence of lead-based paint and lead-based-paint hazards in their apartments and developments.	Partial compliance	NYCHA reports that, according to EH&S random sampling reviews of "Tenant Folders" containing materials documenting resident disclosures, NYCHA was in compliance with this requirement 69.78% of the time, an increase from 63.93% over the last reporting period. 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 random sampling reviews of development binders containing relevant risk assessment results and disclosures, NYCHA was in compliance with this requirement 89.93 % of the time, an increase from 64.73% over the last reporting period. The Monitors will work to independently validate data related to this obligation.
L33 (Ex. A ¶ 29)	Electronic Copies of Disclosures: Ensure that electronic copies of all disclosure	Partial compliance	The First Monitor reported that inspectors found NYCHA was compliant with these

	materials are available to residents through an internet-based portal.		requirements in 95% of buildings. Electronic copies of disclosure materials should be available to residents on the online resident portal. The Monitors observed some instances of non-compliance due to accessibility issues.
L34 (Ex. A ¶ 30(b))	Biannual Certification: Provide the United States and the Monitor a certification describing compliance with abatement and lead-safe work practices obligations by July 2024 and every six months thereafter.	In compliance	
L35 (Ex. A ¶ 33(e))	Ongoing Training: Provide all resident building superintendents, assistant resident building superintendents, and property managers with training in RRP practices on an ongoing basis.	In compliance	

I.6 Inspections

The HUD Agreement requires NYCHA (1) to comply with HUD's physical condition standards, (2) annually self-inspect its apartments, (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 covering the period between January 1, 2025 and April 30, 2025.

A. 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.¹³⁵ As of April 30, 2025, NYCHA completed inspections in 57% of occupied apartments for the year, as depicted in the chart below.



The 2025 inspection rate of 57% represents an increase in NYCHA's completed inspections in 2024, when NYCHA completed 43% in the first four months of the year.

The Monitors' team recently shadowed NYCHA Maintenance Workers and NYCHA's third-party vendor during annual self-inspections and provided NYCHA with feedback on both types of inspections. The Monitors observed that the vendor did not always

conduct the inspections with the thoroughness required by NYCHA's Standard Procedures, such as neglecting to check window guards and failing to shut off the electricity when checking outlets. The Monitors also observed that when NYCHA's Maintenance Workers conducted inspections, their ability to make the necessary repairs was sometimes hindered by not having the necessary materials with them to complete minor repairs during the initial visit. The Monitors shared this feedback with NYCHA management, which NYCHA received constructively and plans to address.

B. Repairs of Deficiencies (Requirement No. I4)

Under the HUD Agreement, NYCHA is required to complete minor repairs of deficiencies discovered during annual apartment inspections. The subsections below provide an update on the minor repairs completed at the time of annual inspections.

As of April 30, 2025, NYCHA reported that Maintenance Workers completed minor repairs in 17% of inspected apartments for the year to date, as illustrated in the table below:

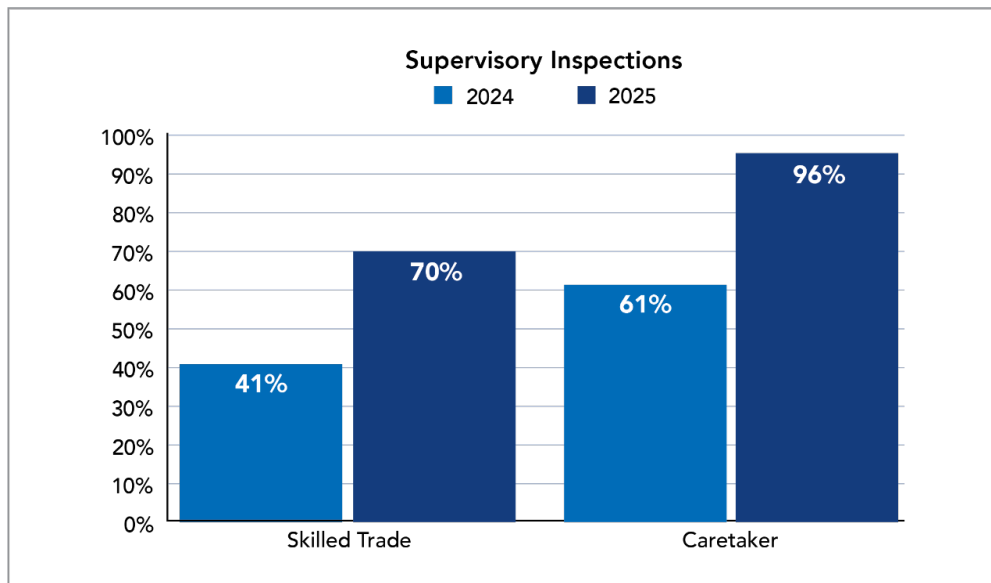
Minor Repairs Completed and Deferred		
Calendar Year	Inspected Units with Minor Repairs Performed	Inspected Units with Minor Repairs Deferred
2019	Not tracked	Not tracked
2020	Not tracked	Not tracked
2021	31%	4%
2022	21%	3%
2023	15%	3%
2024	27%	5%
2025 (as of April 30, 2025)	17%	2%

As also shown above, NYCHA reported that Maintenance Workers deferred minor repairs in approximately 2% of completed

apartment inspections through April 30, 2025. In total, NYCHA reported that its inspections identified a total of 38,453 deficiencies that could be fixed with minor repairs. Of those, NYCHA reported that the Maintenance Worker completing the inspection performed the minor repairs for 35,669 and deferred the minor repairs for 2,784. As described in the Monitors' April 2025 Report, NYCHA is working to improve its documentation and oversight of minor repairs.

C. Industry Standards (Requirement No. 16)

The HUD agreement requires NYCHA to ensure all maintenance repairs are performed to established industry standards and workmanship.¹³⁶ To comply with this obligation, NYCHA requires supervisors of skilled trades workers and Maintenance Workers to perform routine supervisory inspections of a sample of work orders closed. Supervisors of caretakers are also required to inspect the buildings and grounds under their supervision every month. For skilled trades, NYCHA completed 70% of the assigned inspections through April 30, 2025. For caretakers, NYCHA completed 96% of assigned inspections through April 30, 2025. This represents an improvement from 41% and 61% completed for supervisors of skilled trades and caretakers, respectively, in 2024.



NYCHA is taking action to improve its current inability to document and track similar information for the progress of completed supervisory inspections for maintenance work. It has not

historically had a process in place to autogenerate work order selections and record findings in Maximo but expects this to be implemented in the second half of 2025.

D. Deceptive Practices (Requirement No. 17-10)

The HUD Agreement also requires NYCHA to prevent deceptive practices in connection with HUD's inspections. More specifically, the Agreement requires NYCHA: (a) not to use deceptive practices with request to PHAS requirements (Requirement No. 60); (b) to design internal controls to prevent deceptive practices (Requirement No. 61); and (c) to require its Chief Compliance Officer to take a series of steps designed to prevent deceptive practices (Requirement No. 62(a)-(f)). As briefly described in the chart below, NYCHA is in compliance or provisional compliance with these provisions. The details of NYCHA's compliance with these obligations will be discussed at more length in the Monitors' Year 7 Annual Report.

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 April 30, 2025, unless otherwise noted. The table categorizes each requirement as a one-time obligation (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	NYCHA anticipates finalizing the Phase II Annual Inspections Action Plan in the second quarter of 2025.
Response Obligation			
I3 (Ex. B ¶ 47)	Annual Inspections: NYCHA will conduct annual inspections of 100% of occupied apartments.	Not yet due	As of April 30, 2025, NYCHA completed inspections in 57% of occupied apartments, has attempted but not yet accessed 12% of occupied apartments, and has not yet attempted inspections in 31% of occupied apartments.

I4 (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	As of April 30, 2025, NYCHA reported that Maintenance Workers completed minor repairs in 17% of inspected apartments and deferred minor repairs in 2% of inspected apartments. In total, NYCHA reported that its inspections identified a total of 38,453 deficiencies that could be fixed with minor repairs. Of those, NYCHA reported that the Maintenance Worker completing the inspection performed the minor repairs for 35,669 and deferred the minor repairs for 2,784. Furthermore, the Monitors continue to track NYCHA's efforts to improve oversight and documentation of needed repairs, including those described in Section I.6.D.1 of the Monitors' April 2025 report.
Policy and Practice Obligation			
I5 (¶ 60)	HUD's Guidance: NYCHA will make all improvements in accordance with PIH Notice No. 2016-03, Uniform Physical Condition Standard (UPCS)	Not started for 2025	NYCHA's ongoing efforts to comply with this obligation overlap with its attempts to meet Requirement No. 17. HUD will commence the 2025 cycle of

	Deficiencies and Industry Standard Repairs, July 11, 2016, or any subsequent or superseding guidance. ¹³⁷		NSPIRE inspections in the second quarter of 2025.
16 (¶ 60)	Industry Standards: NYCHA will ensure all maintenance repairs are performed to established industry standards and workmanship.	Provisional compliance	NYCHA's Quality Assurance Unit (QAU) does substantial work to monitor the quality of repairs. For the first calendar quarter of 2025, QAU reported that 95% of sampled repairs were completed to the required standard. Based on this self-reported performance, the Monitors provisionally certify that NYCHA is in compliance with this obligation. However, the Monitors continue to engage with NYCHA in an effort to ensure that QAU's processes yield an accurate view of repair work across NYCHA's properties.
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.	Not started for 2025	NYCHA's ongoing efforts to comply with this obligation overlap with its attempts to meet Requirement No. 15. HUD will commence the 2025 cycle of NSPIRE inspections in the second quarter of 2025.

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 issues; (d) performing work in selected or alternate units after such units have been identified, other than for emergency health and safety issues.	Provisional compliance	NYCHA has put in place mechanisms to detect and investigate deceptive practices when they are suspected. To date, the Monitors have not identified material failures in NYCHA's control mechanisms. The Monitors thus provisionally certify NYCHA's compliance with this obligation but are continuing to work with NYCHA in an effort to refine and strengthen its mechanisms for preventing deceptive practices.
19 (¶ 61)	Internal Controls: NYCHA shall design internal controls to prevent deceptive practices.	Partial compliance	NYCHA has put in place mechanisms to detect and investigate deceptive practices when they are suspected. To date, the Monitors have not identified material failures in NYCHA's control mechanisms. The Monitors thus provisionally certify NYCHA's compliance with this obligation but are continuing to work with NYCHA in an effort to refine and strengthen its

			mechanisms for preventing deceptive practices.
110 (¶ 62 (a-f))	Chief Compliance Officer Obligations: NYCHA's Chief Compliance Officer will be responsible for preventing deceptive practices 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.	Provisional compliance	NYCHA has had processes in place since the inception of the first monitorship to fulfill the obligations as part of ¶ 62. The Monitors provisionally certify compliance with the obligations.

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 Monitor's prior reports, NYCHA's plan for doing so is contained in its "Transformation Plan,"¹³⁸ that contains 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.¹³⁹ Consistent with those broad principles, NYCHA also works with the Monitors, SDNY, and HUD to identify additional initiatives that will build on those specific projects, in order to continue to improve itself as an organization.

In this report, the Monitors provide updates on significant developments over the last quarter within key areas pertaining to NYCHA's organizational change.

A. Mold and Leaks Work Order Reduction

As noted in the Monitors' prior reports, the number of repairs that NYCHA must make to residents' apartments remains unsustainably large, with more than 600,000 open work orders, about half of which are assigned to skilled trades workers.¹⁴⁰ As a result of a high volume of work orders and too few workers to complete them, residents often must wait many months for necessary repairs.¹⁴¹ Although NYCHA has made productivity gains in recent years, additional resources and improvements are required for it to make meaningful progress in reducing the work order backlog and reducing residents' wait time.¹⁴² Thus, in late 2024, NYCHA began working with the Monitors, HUD, and SDNY to develop a plan for devoting more resources to this issue, beginning with the apartments that are most in need of significant repairs.¹⁴³ During the last quarter, NYCHA presented its initial detailed plan to the Monitors, and is actively implementing the plan.

As part of its plan for devoting more resources to backlog reduction, NYCHA plans to focus first on mold and leak repairs, because these issues have a particularly significant impact on resident health and well-being. NYCHA's plan supplements its existing Enhanced Oversight Program (EOP), a program led by NYCHA's Office of Mold Assessment and Remediation (OMAR), in which

NYCHA concentrates its efforts on particularly severe concentrations of mold repairs.¹⁴⁴ As part of the new initiative, NYCHA intends to hire 34 additional skilled trades workers—to supplement existing repair work—and has selected 12 developments with a high volume of significant outstanding mold and leak repairs. NYCHA began by selecting among the consolidated developments with the highest volume of outstanding mold and leak work orders, and then prioritized among those developments by focusing on the developments with the lowest scores based on NSPIRE apartment inspections, and the developments with the lowest scores on NYCHA's Mold and Leak Scorecard, which includes, among other metrics, the percentage of work orders that have been pending for more than 100 days and the percentage of instances in which there is a recurrence of mold.¹⁴⁵ NYCHA intends to begin work on this initiative in the late summer or early fall of 2025, beginning with three developments: Sotomayor, Ingersoll, and Whitman. Over the next two years, teams of these skilled trades workers will concentrate their work on these developments, with enhanced oversight from OMAR and NYCHA leadership in Property Management Operations.

NYCHA has consulted with other key partners and stakeholders as well, including the parties to the *Baez* settlement (under which NYCHA committed to improve its handling of mold in apartments), soliciting the assistance of the Ombudsperson Call Center (which receives and tracks complaints about mold growth pursuant to the *Baez* settlement), and the Independent Data Analyst Stout (which operates the OCC and tracks NYCHA's compliance with the settlement).¹⁴⁶ Key areas to monitor for this project are ensuring the quality of the work done, so that repairs do not need to be re-done soon after they are completed; overseeing NYCHA's Neighborhood Planners' communications with residents about this program, so that repairs are efficiently and effectively scheduled; and tracking NYCHA's progress on repairs, so that NYCHA and the Monitors can report on the effectiveness of this program and NYCHA can consider future deployments of additional resources for further reductions in its backlog.

The Monitors strongly support NYCHA's deployment of additional resources to address the neediest apartments, and to deliver repairs to residents more quickly. The Monitors will continue to report on this program in future reports.

B. Neighborhood Model and Expanded Training

The 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.¹⁴⁷ As noted in prior reports, the Monitors have been working collaboratively with NYCHA and HUD to move forward a set of improvement initiatives designed to achieve the goals of the Neighborhood Model, including the goal of empowering Property Management staff to be more responsive to resident concerns.¹⁴⁸ One such initiative involves improving and expanding the trainings delivered to NYCHA development staff, particularly with respect to customer service and de-escalating tense and difficult situations.

In developing this initiative, NYCHA and the Monitor team concluded that although NYCHA had valuable training courses available for these topics, NYCHA did not have the capacity to offer these trainings to thousands of Property Management staff with sufficient frequency. Rather than engaging external, third-party trainers, NYCHA and the Monitor team concluded that the best way to expand NYCHA's training capacity would be through a "Learning Leaders" program, in which high-performing NYCHA employees are selected and trained to teach the training courses. Employing qualified NYCHA employees as trainers is a cost-effective solution and will better ensure that the trainers are trustworthy and relatable for the other NYCHA employees who are being trained. Thus, over the last quarter, NYCHA and the Monitor team collaborated to develop and offer a "Train-the-Trainer" course. The course was taught initially by NYCHA personnel and Monitor team members, and going forward will be taught exclusively by NYCHA. It focuses on improving NYCHA training across the agency to emphasize participant retention, relatability of content, and real-world application. During the weeks of April 28 and May 5, 2025, the courses were offered for a cohort of 24 NYCHA trainers (including trainers from Learning and Development (L&D), Pest, Elevators, and Emergency Management). Once selected, Learning Leaders will attend this course as well.

Meanwhile, in coordination with the Monitors, NYCHA L&D is continuing to develop its training course on Customer Service Opportunities and Challenges, which focuses on improving customer service generally and specifically de-escalating conflict. The course will include training to improve the quality and results of interactions between staff and residents. NYCHA expects that by early September,

its Learning Leaders will begin delivering these courses to NYCHA development staff. The Monitors commend NYCHA for its progress in this area and will continue to collaborate with NYCHA on expanding its training in key areas in order to improve resident services.

C. Caretaker and Maintenance Worker Muster Overhauls

As explained in the Monitors' First Report (Section III.C.4), the Monitors have continued work on the Caretaker Muster Overhaul project begun under the First Monitor. "Musters" are brief, twice-daily meetings of all NYCHA staff with certain titles at their developments.¹⁴⁹ Through the Caretaker Muster Overhaul, the Monitors worked with NYCHA to transform these daily muster meetings (which were previously informal, with no set content) into meetings where robust, standardized guidance and training content could be delivered, covering a wide range of technical and other skills caretakers need to do their jobs well, and including on-the-job trainings delivered by supervisors. NYCHA began offering the revised and strengthened Caretaker Musters at certain properties in the spring of 2024, and they are now being delivered by supervisors of caretakers and/or supervisors of grounds at all NYCHA developments every day.

Whereas the Monitors previously had substantial involvement with creating and maintaining the content offered at the Caretaker Musters, the Monitors have worked with NYCHA over the course of the last quarter to transfer responsibility to NYCHA for owning the maintenance and delivery of the program in its entirety. NYCHA will have dedicated personnel in its Property Management Operations Department who will manage all the administrative tasks associated with the program, including creating and distributing new content, along with reviewing and implementing feedback. NYCHA's L&D Department will manage the ongoing training necessary for the program, including quarterly trainings on the musters for all promoted and newly hired supervisors, Superintendents, Assistant Superintendents, Property Managers, and Neighborhood Administrators. NYCHA L&D will offer refresher courses as well. Both the Monitors and NYCHA will continue to oversee the delivery of the Caretaker Musters to ensure that they provide effective guidance and on-the-job training to caretakers.

As a priority for Year 7 of the Monitorship, NYCHA has now also commenced a similar muster-overhaul effort for maintenance

workers. During the last quarter, the Monitors collaborated with NYCHA's Property Management Operations and L&D Departments to develop the program objective and design. The maintenance worker muster overhaul program is designed to improve daily operations for NYCHA maintenance workers by enhancing communication, consistency, accountability, and efficiency. Structured daily musters will support clear task assignments, stronger supervisor-staff rapport, professional development, and team productivity. The Monitors are working with NYCHA to finalize the implementation of this program in more detail. The Monitors and NYCHA have solicited input from the Local 237 union (which represents maintenance workers, among other NYCHA employees) regarding the program design and implementation to ensure an effective launch.

The Monitors will continue to provide updates about the Maintenance Worker Muster Overhaul in future reports.

D. Vendor Evaluation

As noted in the Monitors' December 2024 Report, the Monitors and NYCHA have agreed upon an initiative in which the Monitors will work with NYCHA to suggest improvements to NYCHA's process for evaluating the performance of vendors who contract with the non-capital departments within NYCHA.¹⁵⁰ NYCHA contracts with vendors that provide a wide variety of materials and services. Vendor services may include administrative work, software solutions, and physical work at the developments, including painting and plastering apartments and external building repairs and grounds work. It is essential that NYCHA have an effective system for NYCHA personnel to evaluate the quality of materials provided and work done by these vendors, and record and report those evaluations so that they can be relied upon in the future when NYCHA makes decisions about which vendors to engage.

During the last quarter, after consulting various NYCHA staff and reviewing documents from the systems used for vendor evaluations, the Monitor team met with NYCHA Procurement to discuss initial feedback and tentative recommendations as to key improvements for its vendor evaluation system. The principal challenges to the current system include, among other things:

- **Incomplete as to Vendors:** Many of NYCHA's vendor contracts and purchase orders are not evaluated at all,

because NYCHA's vendor evaluation system is currently only used to evaluate individual contracts that are worth more than \$150,000;

- **Incomplete as to NYCHA Evaluators and Other Inputs:** NYCHA's system only prompts evaluations from one assigned "evaluator" for each transaction, who may not be directly observing the vendor's work. NYCHA does not have an existing process or procedure in which it encourages or prompts employees who directly observe the vendor's performance to provide these ad hoc reviews with their direct experiences. Moreover, NYCHA compliance units that obtain negative information about a vendor do not share that information with the assigned evaluator, and it thus does not get documented in the vendor evaluations;
- **Poorly Timed Evaluations:** Currently, NYCHA's system prompts users to enter a vendor evaluation whenever 90% of payment is completed for that vendor, and once annually, irrespective of payment. NYCHA is currently expanding its system so that an evaluation is prompted when 25% and 50% of the contract is paid as well, and if there is a termination for default. However, a vendor may provide materials or services to many developments or units before those milestones are met, and significant time may pass before an evaluation for those services is entered. NYCHA and the Monitors intend to move toward having staff who purchased services and materials evaluate vendors at the point of any services rendered or materials received in order to gain a more contemporaneous view of performance and quality, which will likely lead to more reliable and comprehensive evaluations;
- **Insufficient Use in NYCHA Decision-making:** Until recently, NYCHA did not always review vendor evaluations when making decisions about vendor responsibility, including which vendors should be selected for future work, and which should be disqualified. NYCHA proactively identified this gap, and reports that it now is reviewing vendor evaluations for

all such decisions, but in light of the above-described limitations on how the evaluations are completed, these reviews may not reveal enough information to deny a poorly performing or unethical vendor the opportunity to continue doing work with NYCHA.

Recent public reporting has confirmed some of these issues. For example, a recent news report indicated that NYCHA has continued to award contracts to vendors who were implicated in the February 2024 bribery scandal in which dozens of NYCHA employees were arrested.¹⁵¹ While these vendors were not ultimately prosecuted, their admission of criminal activity should be considered when evaluating them for further work with NYCHA.

The Monitors will continue to work with NYCHA on developing potential solutions to these issues, including recommending and assisting with the implementation of process improvements for vendor evaluations and strengthened policies related to vendor management. NYCHA has stated that its expansion of staff input to vendor performance is hampered by technology challenges, which require additional funding and capacity to address. The Monitors will work towards a vendor evaluation that includes more feedback from NYCHA employees who are directly involved with the vendors' work, provided at the point of receipt of that work; findings from NYCHA's oversight departments such as Quality Assurance; and feedback from residents. One such initiative that NYCHA has begun, as of June 2025, is the launch of resident surveys following the completion of maintenance or other repairs completed in their apartment, including work completed by vendors. NYCHA should ensure that the results of these surveys are linked to the vendor's evaluation file, for future consideration.

E. Significant IT System Overhauls

NYCHA is currently engaged in at least two major IT system overhauls that it committed to as part of the Transformation Plan: its adoption of a new Human Capital Management System ("HCMS"), which consolidates and improves several systems used by NYCHA HR;¹⁵² and its implementation of a new Resident Case Management System ("RCMS"), which will consolidate and improve multiple existing systems used by NYCHA residents to interact with NYCHA.¹⁵³ As noted in prior reports, both of these projects have experienced significant delays from their initially planned timelines.¹⁵⁴ Because

these projects are important to NYCHA's transformation efforts, the Monitors have continued regular oversight of these projects.

In the last quarter, in April 2025, the new HCMS went live for NYCHA's HR Department, which is serving as its "pilot" group (a smaller segment of NYCHA that will be testing out the new system). NYCHA tentatively plans to expand system access to a broader portion of its workforce during summer 2025. The timeline for the final phase of implementation, an agency-wide rollout, has yet to be determined. NYCHA HR has presented an overview of the new HCMS to each borough during monthly meetings, and agency-wide communications have been sent regarding the upcoming transition to the new system. NYCHA is developing the necessary trainings that will be required for implementing the new system across the agency. The HCM trainings will include eLearning as well as instructor-led classes.

As to RCMS, NYCHA IT has continued to work with the vendor charged with developing and implementing the RCMS system overhaul (NYCHA similarly outsourced the HCMS overhaul to a separate vendor, a common practice due to resource constraints and IT systems expertise). In the last quarter, while continuing to work on the development and design of the system, NYCHA has been particularly focused on developing a plan for employee trainings for the new RCMS, as well as a communication plan.

Unfortunately, the RCMS project continues to experience delays and adjustments extending the planned timeline. The vendor has repeatedly reported extensions of the planned timeline by several months, without adequate explanation. For example, demonstrations of the first phase of RCMS that were planned to begin in June 2025 have not yet begun.

Following a series of delays and a lack of timely updates and engagement from the RCMS vendor, NYCHA appropriately required the vendor to issue a Corrective Action Plan. In that plan, the vendor agreed to provide more regular updates to increase NYCHA's visibility on the project plan and timing, which will allow NYCHA to more actively manage the project. However, since then, not all such updates have been issued in a timely fashion and the full terms of the Corrective Action Plan have not yet been met. In particular, the project management communication requirements are not being fully met, including the proactive communication of risks to the schedule, how

those risks will be mitigated, and their ongoing effect on the schedule. These gaps make it harder to ensure accountability and transparency. NYCHA reports that it is in the process of implementing a revised project governance model that aims to provide improved transparency and visibility of risks across various levels of the project.

Because the new RCMS pertains to areas that are a high priority for the Monitors, including improvements to resident communications, the Monitors will continue to provide updates on the project in future reports.

* * *

The Monitors will continue to work with NYCHA on the initiatives described above as well as a number of other initiatives described in previous reporting on NYCHA's Organizational Change efforts.

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), 3-7, 9(a), 10(a)-(b), 13(a)-(c), 14(c), Jan. 31, 2019 (hereinafter the “HUD Agreement” or “Agreement”).

² Agreement, Ex. B ¶ 14(c).

³ As discussed in the Monitors’ April 2025 Report, NYCHA met its interim obligation to replace 133 boilers by December 31, 2024. Monitors’ Report, Apr. 3, 2025, at 14.

⁴ Agreement, Ex. B ¶¶ 1, 2(a); N.Y.C. Admin. Code § 27-2029(a).

⁵ Agreement, Ex. B ¶ 2(a)-(b).

⁶ *Id.* ¶ 2(a).

⁷ *Id.* ¶ 2(b).

⁸ *Id.* ¶ 2(a).

⁹ *Id.* ¶ 9(a).

¹⁰ *Id.* ¶ 10(a).

¹¹ *Id.* ¶¶ 9(a), 10(a).

¹² *Id.* ¶ 9(a).

¹³ *Id.* ¶ 10(a).

¹⁴ *Id.*

¹⁵ *Id.* ¶¶ 9(c), 10(b).

¹⁶ EH&S conducts investigations of some resident complaints received through NYCHA’s Complaint Portal.

¹⁷ On November 15, 2024, there were eight heating outages across different developments caused by an incident attributed to Con Edison. Because these eight outages were related and attributed to the same root cause, they were consolidated and counted as a single outage.

¹⁸ Monitors’ Report, Apr. 3, 2025, at 19.

¹⁹ NYCHA, Heating Action Plan, Dec. 4, 2019, at 33; Agreement, Ex. B ¶ 7.

²⁰ Agreement, Ex. B ¶¶ 4-5.

²¹ *Id.* ¶¶ 23(a), 24(a), 27, 29(a)(i), 29(a)(ii).

²² *Id.* ¶¶ 24(b), 28, 29(b)(iii), 29(b)(iv).

²³ *Id.* ¶¶ 32, 33.

²⁴ *Id.* ¶ 34(b).

²⁵ *Id.* ¶ 31.

²⁶ *Id.* ¶ 34(a).

²⁷ *Id.* The HUD Agreement also required 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.” *Id.* According to NYCHA, it met the requirement to transfer 150 elevators to PACT developers by August 31, 2024, and the Monitors are continuing to verify completion of this requirement.

²⁸ Monitors’ Report, Apr. 3, 2025, at 28.

²⁹ There are the same number of elevator banks with multiple elevators in this report as compared to the previous report. See Monitors’ Report, Apr. 3, 2025, at 29. Sometimes, there are fewer elevator banks with multiple elevators between reports because when developments are transferred to a third-party through the PACT program, the elevators in those developments are no longer included in measuring performance for the HUD Agreement obligations. This change is applied retroactively, so the same elevators currently serviced by NYCHA are assessed across years. Accordingly, measures of performance indicated in previous reports may vary slightly based on the retroactive exclusion of these transferred elevators.

³⁰ 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).

³¹ *Id.* ¶¶ 23(a), 24(a). Unlike related obligations, this requirement was not superseded.

³² By the end of Year 1, the Agreement required NYCHA to resolve 75% of no-service conditions within 18 hours of learning of them. *Id.* ¶ 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 12 hours. *Id.* ¶¶ 29(a)(i), 29(a)(ii).

³³ *Id.* ¶ 29(a)(i).

³⁴ *Id.* ¶ 29(a)(ii). NYCHA tracks outages due to elevator rehabilitation or replacement, and the Monitors have excluded those outages from their assessment of NYCHA's performance under this obligation as permitted by the Agreement. However, NYCHA does not track whether a no-service condition falls under an exception because it had an industry-accepted repair time of longer than 12 hours or because a part was unavailable. Accordingly, the Monitors' assessment of NYCHA's performance under this obligation may include such outages.

³⁵ *Id.* ¶ 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). 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. *Id.*

³⁶ *Id.* ¶ 32.

³⁷ Monitors' Report, Dec. 19, 2024, at 38-39.

³⁸ For the analysis, the Monitors analyzed relevant data for the calendar year of 2023. The Monitors found that approximately 85% of all no-service conditions resulting from preventive maintenance during the Agreement-restricted hours took place between 8:30 a.m. and 9:00 a.m. during 2023. Notably, of the approximately 3,000 instances when a no-service condition resulted from preventive maintenance during the restricted hours in 2023, 97% of those instances occurred between 6:00 a.m. and 9:00 a.m., and only 3% of the instances occurred between 4:00 p.m. and 8:00 p.m.

³⁹ Monitors' Report, Dec. 19, 2024, at 38-39; Monitors' Report, Apr. 3, 2025, at 32-34.

⁴⁰ Monitors' Report, Apr. 3, 2025, at 34.

⁴¹ 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).

⁴² *Id.* Beginning in Year 3, the HUD Agreement required NYCHA to ensure that no elevator car 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 car have more than 12 unplanned outages per year. *Id.* ¶ 24(b).

⁴³ *Id.* ¶ 28. 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. Monitors' Report, Aug. 21, 2024, at 87-88.

⁴⁴ Agreement, Ex. B ¶ 29(b)(iii).

⁴⁵ *Id.* ¶ 29(b)(iv). NYCHA tracks outages due to elevator rehabilitation or replacement, and the Monitors have excluded those outages from their assessment of NYCHA's performance under this obligation as permitted by the Agreement. 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 18 hours. Accordingly, the Monitors' assessment of NYCHA's performance under this obligation may include such outages.

⁴⁶ *Id.* ¶¶ 35-37.

⁴⁷ *Id.* ¶¶ 38-39.

⁴⁸ *Id.* ¶¶ 41, 43-44.

⁴⁹ *Id.* ¶¶ 45-46.

⁵⁰ *Id.* ¶ 46.

⁵¹ *Id.* ¶ 35.

⁵² *Id.* ¶ 35.

⁵³ *Id.* ¶ 36.

⁵⁴ Monitors' Report, April 3, 2025, at 49-51

⁵⁵ *Id.*

⁵⁶ Agreement, Ex. B ¶ 35.

⁵⁷ The process used to determine pest population estimates at NYCHA results in unrounded figures, as seen in the following charts. However, the figures are intended to give a sense of the estimated pest populations and whether they are increasing or decreasing over time. Therefore, rounded figures appear in text.

⁵⁸ Year 0 represents the year before the outset of the monitorship in 2019 (i.e., February 1, 2018 to January 31, 2019). The Year 0 pest population estimates are used as a baseline to compare the effects of the monitorship on NYCHA's pest populations in Years 1-7.

⁵⁹ Year 3 ended in January 2022.

⁶⁰ Year 5 ended in January 2024.

⁶¹ Monitors' Report, April 3, 2025, at 53-54; The decline in mouse, cockroach, and bed bug populations in the early years of the monitorship (particularly from Year 0 to Year 1) occurred due to a combination of factors, including NYCHA's initial efforts to treat high-infestation apartments and early and material improvements in pest management practices.

⁶² Agreement, Ex. B ¶ 37.

⁶³ As discussed in greater detail in the April 2025 Report, 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. Monitors' Report, April 3, 2025, at 55.

⁶⁴ Agreement, Ex. B ¶¶ 38-39. As discussed in the 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.

⁶⁵ Agreement, Ex. B ¶ 39(a).

⁶⁶ *Id.* ¶ 39(b).

⁶⁷ *Id.* ¶ 38(d).

⁶⁸ *Id.* ¶¶ 43-44.

⁶⁹ *Id.* ¶¶ 43-44.

⁷⁰ Monitors' Report, Aug. 21, 2024, at 111-12; Monitors' Report, Dec. 19, 2024, at 63-65.

⁷¹ Agreement, Ex. B ¶ 38(c).

⁷² *Id.* ¶¶ 43-44.

⁷³ Monitors' Report, Aug. 21, 2024, at 110; Monitors' Report, Dec. 19, 2024, at 66.

⁷⁴ Monitors' Report, Aug. 21, 2024, at 110; Monitors' Report, Dec. 19, 2024, at 66.

⁷⁵ Monitors' Report, Aug. 21, 2024, at 110; Monitors' Report, Dec. 19, 2024, at 66.

⁷⁶ Defining additional exterior common areas as high-traffic areas is presently limited because of how exterior common areas are identified and tracked by NYCHA, in addition to the inherent difficulty of assigning a work order to an unenclosed area. In the future, the Monitors and NYCHA may reassess how to prioritize additional exterior common areas for pest management.

⁷⁷ Agreement, Ex. B ¶ 45.

⁷⁸ *Id.*

⁷⁹ NYCHA, City Capital Action Plan, May 8, 2021, at 18.

⁸⁰ *Id.*

⁸¹ Agreement, Ex. B ¶ 46(b). In addition to rat slabs, the HUD Agreement required NYCHA to (1) install 8,000 door sweeps, Agreement, Ex. B ¶ 46(a), which the First Monitor determined that NYCHA completed in February 2022, and (2) install ten exterior bulk crushers, Agreement, Ex. B ¶ 46(d), which NYCHA completed in December 2022. Monitors' Report, Aug. 21, 2024, at 103-04.

⁸² Monitors' Report, Dec. 19, 2024, at 70; City Capital Action Plan, May 8, 2021, at 17.

⁸³ City Capital Action Plan, May 8, 2021, at 17-18, 21-33; Monitors' Report, Dec. 19, 2024, at 70-71. As NYCHA continues to conduct field investigations and analyses, the number of waste yards and interior compactors it plans to complete under the CCAP have changed. The Monitors are reviewing NYCHA's proposed CCAP amendment, which will establish the number of waste yards and interior compactors NYCHA commits to completing under the CCAP.

⁸⁴ Monitors' Report, Dec. 19, 2024, at 79; Agreement, Ex. B ¶¶ 15, 17, 19.

⁸⁵ Agreement, Ex. B ¶ 20.

⁸⁶ *Id.* ¶ 17(a)-(c).

⁸⁷ *Id.* ¶ 17(b).

⁸⁸ *Id.*

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ *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.

⁹² NYCHA breaks down backlog data by date. Although all open work orders are technically included in the backlog, approximately 62,500 work orders have been in the backlog for 16 days or more. As discussed above, the HUD Agreement requires NYCHA to remediate mold and its root causes by complex repairs within 15 days.

⁹³ 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.

⁹⁴ Agreement, Ex. B ¶ 17(a).

⁹⁵ NYCHA, "Business Rules for Exhibit B Metrics," Sept. 30, 2021, at 3.

⁹⁶ Agreement, Ex. B ¶ 17(c).

⁹⁷ *Id.*

⁹⁸ Monitors' Report, Dec. 19, 2024, at 87-88.

⁹⁹ *Id.* at 88.

¹⁰⁰ *Id.* The reimagined Leak SP workflow will not, however, permit the automatic generation of child work orders following leak inspections.

¹⁰¹ Agreement, Ex. B ¶ 15(a)-(c).

¹⁰² *Id.* ¶ 15(a).

¹⁰³ *Id.* ¶ 15(b).

¹⁰⁴ Monitors' Report, April 2025, at 83; Monitors' Report, December 2024, at 92

¹⁰⁵ Agreement, Ex. B ¶ 15(c).

¹⁰⁶ 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 the first quarter of Year 6, there were 41 such apartments. That means that from May 1, 2024, to and including April 30, 2025, 41 apartments had more than three verified mold complaints within the last 12 months.

¹⁰⁷ Monitors’ Report, Dec. 19, 2024, at 95-99.

¹⁰⁸ *Id.* at 96.

¹⁰⁹ *Id.* at 98.

¹¹⁰ T&T Comp Mod site visit.

¹¹¹ *Id.*

¹¹² NYCHA, PowerPoint titled “CCAP Monthly Update to Monitor April 2025,” Mar. 20, 2025, at 4.

¹¹³ NYCHA, PowerPoint titled “Building Line Initiative Healthy Homes,” Feb. 2025.

¹¹⁴ Agreement Ex. B ¶ 20.

¹¹⁵ Monitors’ Report, Aug. 21, 2024, at 145-46

¹¹⁶ *Id.* at 152-53.

¹¹⁷ 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. A ¶¶ 8-12, Jan. 31, 2019 (hereinafter the “HUD Agreement” or “Agreement”).

¹¹⁸ Data classified as Year 6 or 7 data refers to information tracked by Agreement year (February through January). Data classified as 2023, 2024, or 2025 refers to data tracked by calendar year (January through December).

¹¹⁹ Agreement, Ex. A ¶¶ 9-11.

¹²⁰ Monitors’ Report, Aug. 21, 2024, at 156.

¹²¹ Phase One prioritized CU6 Apartments, in addition to apartments meeting other criteria.

¹²² The total XRF testing universe consists of 147,184 apartments. At present, there are 24 decommissioned and 402 RAD/PACT units which no longer require a XRF test at the 0.5mg/cm² threshold. There are also 855 units which are currently off rent roll and will only require an XRF test if the apartment goes back on the rent roll.

¹²³ Monitors’ Report, Dec. 19, 2024, at 107.

¹²⁴ The data for the quarterly report was exported on May 1, 2025. As of May 28, 2025, the data shows that 1,064 apartments were abated in the first quarter of Year 7. This discrepancy of 109 apartment abatements is commonly caused by administrative delays.

¹²⁵ 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.

¹²⁶ Note that the total universe of apartments containing lead-based paint will continue to grow as NYCHA continues to conduct XRF testing.

¹²⁷ NYCHA’s ultimate progress towards meeting this obligation will be dependent on the number of apartments that NYCHA identifies as needing abatement in its remaining XRF testing. Monitors’ Report, Dec. 19, 2024, at 108.

¹²⁸ *Id.* at 109.

¹²⁹ Agreement, Ex. A ¶¶ 23, 25-26; Monitors’ Report, Aug. 21, 2024, at 164.

¹³⁰ Agreement, Ex. A ¶¶ 23, 25-26.

¹³¹ 24 C.F.R. § 35.1355(a)(2).

¹³² The backlog described herein is the backlog as defined by NYCHA’s “Operation Lead The Way Initiative.” The goal is to make progress on reducing the backlog, which is hard to track given the dynamic universe of work orders. As a result, NYCHA and the Monitors agreed to freeze and define the universe as of December 2024 to track progress. This universe of work

orders comprises all open paint remediation work orders derived from a 2022, 2023, or 2024 apartment visual assessment or XRF test. It is a subset of the overall paint remediation work order backlog.

¹³³ Agreement, Ex. A ¶ 8.

¹³⁴ As of June 2025, only one apartment remains to abate at Harlem River Houses. The delay on the final apartment relates to a resident refusing access to the apartment. NYCHA is in the process of pursuing further action to gain access.

¹³⁵ Agreement Ex. B ¶ 47.

¹³⁶ Agreement ¶ 60.

¹³⁷ The parties agree that superseding guidance requires NYCHA to comply with the NSPIRE standards under this clause of Agreement ¶ 60.

¹³⁸ 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.”

¹³⁹ See Section III.C of the Monitors’ August 2024 Report. The Monitors provided an update on the status of each of these 47 initiatives in Section II.B of the Monitors’ April 2025 Report.

¹⁴⁰ Monitors’ Report, Apr. 3, 2025, at 139.

¹⁴¹ Monitors’ Report, Dec. 19, 2024, at 151.

¹⁴² See NYCHA Organizational Plan Quarterly Report Q4 2024, at 9-13; see also Monitors’ Report, Dec. 19, 2024, at 153.

¹⁴³ Monitors’ Report, Dec. 19, 2024, at 154-55; Monitors’ Report, Apr. 3, 2025, at 72.

¹⁴⁴ Monitors’ Report, Aug. 21, 2024, at 141.

¹⁴⁵ See NYCHA Update on “EOP+” Program, May 6, 2025, at 2.

¹⁴⁶ Monitors’ Report, Aug. 21, 2024, at 145-46 (discussing the *Baez* settlement and various actions resulting from it).

¹⁴⁷ See Monitors’ Report, Aug. 21, 2024, at 224; see also Monitors’ Report, Dec. 19, 2024, at 168.

¹⁴⁸ *Id.* at 137-38.

¹⁴⁹ Monitors’ Report, Aug. 21, 2024, at 233-34.

¹⁵⁰ Monitors’ Report, Dec. 19, 2024, at 173-74.

¹⁵¹ Smith, Greg, *NYCHA Paid Out Millions to Bribe-Paying Contractors Implicated in Corruption Takedown*, THE CITY (Apr. 16, 2025), available at <https://www.thecity.nyc/2025/04/16/nycha-super-bribes-contractors/>.

¹⁵² See Monitors’ Report, Dec. 19, 2024, at 190-93 (summarizing HCMS in detail); Monitors’ Report, Apr. 3, 2025, at 168 (providing brief update on status).

¹⁵³ Monitors’ Report, Apr. 3, 2025, at 164 (briefly summarizing and updating on status).

¹⁵⁴ *Id.* at 168.

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		
H5 (Ex. B ¶¶ 6-7)	Action Plan for Installing Temperature Monitoring and Disclosing Temperature Information: Action Plan for Installing Temperature Monitoring and Disclosing Temperature Information. NYCHA will draft an action plan to set electronic temperature sensing device installation deadlines for the rest of all the developments and provide an appropriate mechanism for disclosing information from electronic temperature reading devices to the public.	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)
P13 (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.

L4 (Ex A ¶ 5(b))	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.	Substantially Complete ² (Monitors' Report, Aug. 21, 2024, at 155-56)
L5 (Ex. A ¶ 6)	Exemption Documentation: Provide the United States with documents sufficient to show NYCHA's basis for claiming that particular developments are exempt.	Complete (Monitors' Report, Aug. 21, 2024, at 155-56)
L7 (Ex. A ¶ 19)	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.	Complete (Monitors' Report, Aug. 21, 2024, at 164-65)
L8 (Ex. A ¶ 20)	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.	Complete (Monitors' Report, Aug. 21, 2024, at 164-65)

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.

L9 (Ex. A ¶ 21)	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.	Complete (Monitors' Report, Aug. 21, 2024, at 164-65)
L10 (Ex. A ¶ 22)	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.	Complete (Monitors' Report, Aug. 21, 2024, at 164-65)
L11 (Ex. A ¶ 24)	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.	Complete (Monitors' Report, Aug. 21, 2024, at 164-65)
L12 (Ex. A ¶ 30(a))	One-time Certification: Submit to the United States a statement describing compliance with priority action obligations within 120 days of the Effective Date.	Complete (Monitors' Report, Aug. 21, 2024, at 155-56)
L13 (Ex. A ¶ 33(a))	Sample Kit: Display a sample kit of the supplies needed to complete an RPP work order in all 139 storerooms by January 31, 2019.	Complete (Monitors' Report, Aug. 21, 2024, at 158-60)
L14 (Ex. A ¶ 33(b))	RRP Supplies: Issue a minimum of one kit of RRP supplies to RRP-certified staff daily by February 28, 2019.	Complete (Monitors' Report, Aug. 21, 2024, at 158-60)
L15 (Ex. A ¶ 33(c))	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.	Complete (Monitors' Report, Aug. 21, 2024, at 158-60)
L16 (Ex. A ¶ 33(d))	Dust-Control Training: Select a vendor to supplement the EPA's RRP training with	Complete (Monitors' Report,

	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

Certain terms used in the Monitors' report are defined below. Each entry notes the section in which it appears.

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

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. **(Pests & Waste)**

Complex Repair: A complex repair is one that must be performed by Skilled Trade Workers or other specialized staff. **(Mold & Leaks)**

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

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. **(Lead)**

Fixture Removal: Fixtures, including cabinetry, sheet rock, or floor tiles, that have been damaged by mold must be removed. **(Mold & Leaks)**

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)**

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)**

Leak Standard Procedure ("Leak SP"): A standardized process for identifying, tracing, and addressing the root causes of leaks across all NYCHA developments. **(Mold & Leaks)**

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. **(Heat)**

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)**

No-Service Condition: The HUD Agreement defines a "no-service condition" 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 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)**

Pests: Under the HUD Agreement, the term "pests" refers to rats, mice, cockroaches, and bed bugs. **(Pests & Waste)**

Pest Standard Procedure: 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. **(Pests & Waste)**

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. **(Pests & Waste)**

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.. **(Mold & Leaks)**

Remove: Removing mold refers to cleaning visible mold, removing building materials with mold, and applying mold-resistant paint. **(Mold & Leaks)**

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. **(Mold & Leaks)**

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 Standard Procedure, a work plan is automatically generated following a verified mold inspection. **(Mold & Leaks)**

X-Ray Fluorescence ("XRF") Testing: A non-destructive analytical technique that uses X-rays to determine the elemental composition of a material, including to determine whether lead is present. **(Lead)**