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DOI REPORT IDENTIFIES ADDITIONAL WAYS CITY SHOULD FURTHER STREAMLINE FUNDING AND APPROVAL PROCESS TO EXPEDITE INSTALLATION OF SECURITY CAMERAS IN CITY HOUSING AUTHORITY PROPERTIES

Mark G. Peters, Commissioner of the New York City Department of Investigation ("DOI"), issued the following Report today that found an inefficient City process for the funding and installation of closed circuit television cameras and other security improvements in New York City Housing Authority ("NYCHA") complexes and recommended new ways to strengthen and improve the process.

DOI opened its investigation after two children were stabbed, one fatally, in June 2014 in an elevator at NYCHA's Boulevard Houses in Brooklyn. DOI's investigation determined that in the aftermath of this tragedy, the Mayor's Office focused on this issue, increasing funding for a more comprehensive crime-reduction approach in NYCHA housing and expediting a part of the approval process that reduced the turnaround time to approximately 30 days when it had been at least three months. DOI's investigation further sought to look at what obstacles may continue to delay the installation of security cameras and layered access controls, such as electronic key fobs; and uncovered a complex approval process that consists of several external City agencies and multiple internal departments at NYCHA, and which could take months from funding allocation to installation – and in some cases years. DOI recommended the City sustain the strides it has already made in accelerating the approval process and offered suggestions on how to further streamline the process. NYCHA and OMB have coordinated with DOI to implement these new recommendations to improve service and safety for City residents of public housing.

A copy of the Report is attached to this release, and can be found at the following link:
<http://www.nyc.gov/html/doi/html/doireports/public.shtml>

DOI Commissioner Mark G. Peters, said, "DOI's investigation demonstrated that not only is it feasible to expedite the process to fund and install cameras and other security enhancements in public housing, but it is sustainable. I am pleased that NYCHA and OMB have agreed to adopt virtually all of DOI's recommendations, which offer a road map to make that goal a consistent reality."

NYCHA Chair and CEO Shola Olatoye said, "The safety of NYCHA residents is a priority and working together we can build safe and connected communities. We welcome the improvements and investments to the current CCTV process that come from collaboration and addressing this along with our partners in government that share these important goals"

Director of the City Office of Management and Budget Dean A. Fuleihan, "For too long, the installation of NYCHA security cameras was met with bureaucratic delays. That's why earlier this year, Mayor de Blasio and the administration took major steps to improve security for NYCHA residents, including a \$210.5 million comprehensive safety plan and expediting NYCHA security enhancements to get them in place as soon as

more

possible. We will continue to further streamline security, including by implementing the recommendations of partners like DOI – because nothing is more important than keeping New Yorkers safe.”

Historically, NYCHA has relied primarily on City Council Members’ discretionary funds to pay for security equipment. DOI’s Report found that the current process has many steps, some unnecessary, and requires the involvement and approval of a multitude of stakeholders, including City Council members, the City Office of Management and Budget (“OMB”), the City Comptroller’s Office and the City Department of Housing Preservation and Development. DOI’s investigation also found that using City Council discretionary funds tied to specific geographic districts limits the locations where NYCHA can establish security improvements and curtails the agency’s ability to make Citywide strategic decisions in this important area. Based on its investigation, DOI issued the following recommendations, many of which have already been implemented:

- The City must seek alternative long-term funding streams to pay for these needed security upgrades.
- NYCHA should develop a strategic Citywide security improvement plan based on factors such as emergency security problems, under-served buildings and developments, and requests for security upgrades that have been pending for a lengthy period. The \$50 million recently allocated to NYCHA by the Mayor’s Action Plan for Neighborhood Safety (“MAP”) presents an unprecedented opportunity for NYCHA to target 15 designated developments with physical security improvements as well as expanded services. Alternatively, NYCHA should consider the feasibility of spending available resources to pay up-front for security upgrades then seek reimbursement.
- NYCHA should streamline the security camera procurement process both within NYCHA and with external City agencies. DOI’s investigation uncovered several inefficiencies in the procurement process which can be simplified, specifically:
 - ✓ Developing standardized language that can be used in line-item descriptions for City Council funds.
 - ✓ NYCHA should increase Accounting Department staff trained in the use of necessary City databases.
 - ✓ NYCHA and OMB should continue to ensure that OMB sustains its recent gains in shortening its response time, including prioritizing NYCHA submissions and NYCHA preparing complete submissions and developing standardized language to successfully complete the OMB questionnaire.

DOI, NYCHA, and OMB have discussed these recommendations. NYCHA and OMB have agreed to implement DOI’s recommendations, except for one:

1. NYCHA is committed to using all available capital funds for critical structural repairs; therefore, the suggestion to pay up-front for security upgrades will not be implemented since that funding would come from NYCHA’s capital funds.

DOI will continue to monitor this process.

As of October 31, 2014, NYCHA has installed 11,035 security cameras, 44% of those cameras installed in the last two years due to greater funding from the City. As of November 11, 2014, 71% of the

housing development sites slated to receive cameras this calendar year – 35 out of the 49 sites -- have been completed. In July 2014, Mayor Bill de Blasio announced a \$210.5 million comprehensive, Citywide plan to improve security and reduce violent crime in NYCHA developments through targeted law enforcement efforts, immediate physical improvements, aggressive community engagement and outreach, and the expansion of work and education programs.

DOI Commissioner Mark Peters thanked NYCHA's Chair Shola Olatoye, and NYCHA's Capital Projects Department, Budget & Financial Planning Department, and Accounting & Fiscal Services Department; and the Director of the City Office of Management and Budget Dean A. Fuleihan and their staffs for their cooperation and assistance in this investigation. DOI also thanked the Office of New York City Comptroller Scott M. Stringer, and his staff, for providing information for this review.

DOI's Office of Inspector General for NYCHA conducted the investigation, specifically Inspector General Ralph Iannuzzi and Senior Deputy Inspector General Pamela Sah, under the supervision of Associate Commissioner William Jorgenson.

DOI is one of the oldest law-enforcement agencies in the country. The agency investigates and refers for prosecution City employees and contractors engaged in corrupt or fraudulent activities or unethical conduct. Investigations may involve any agency, officer, elected official or employee of the City, as well as those who do business with or receive benefits from the City.

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New York City Department of Investigation

**Investigation into New York City Housing Authority's
Funding and Installation of Security Cameras and Improvements**

**MARK G. PETERS
COMMISSIONER**

November 2014



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80 MAIDEN LANE
NEW YORK, NY 10038
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November 21, 2014

Shola Olatoye
Chair and Chief Executive Officer
New York City Housing Authority
250 Broadway, 12th Floor
New York, NY 10007

Re: Closed Circuit Television and Security Improvements Program

Dear Chair Olatoye,

In June 2014, the Department of Investigation's Office of the Inspector General ("OIG") for the New York City Housing Authority ("NYCHA") commenced a review of NYCHA's security equipment program in order to detect possible corruption hazards and/or inefficiencies. The OIG initiated this review following a brutal attack on two children that occurred in a Boulevard Houses elevator that did not have a security camera, although the New York City Council had allocated funds to install cameras at Boulevard Houses a year earlier in its Fiscal Year 2014 budget. The OIG reviewed the history of NYCHA's security enhancement program, funding streams, the procurement process, and the design and construction work needed to install cameras and other security enhancements at the housing developments. Our investigative findings and recommendations are detailed below.

I. History of NYCHA's Security Equipment Program

NYCHA has 334 housing developments that contain 2,563 residential high-rise buildings. In 1998, NYCHA began placing security cameras in its residential buildings.

From 1998 to 2003, NYCHA relied on a United States Department of Housing & Urban Development ("HUD") funding stream for anti-crime initiatives to pay for the cameras, but amidst plummeting federal funding for public housing,¹ these funds were eliminated in 2003. NYCHA now receives federal and city funding for capital improvements, but given the urgent maintenance

¹ See, e.g., Community Service Society report, "Strengthening New York City's Public Housing: Directions for Change," by Victor Bach and Tom Waters, July 2014, at 8-13, available online at: http://b3cdn.net/nycss/2c5a651f36299b9dbf_02m6vzhld.pdf.

demands of NYCHA's aging and deteriorating housing stock, the agency directs its capital dollars to fix issues such as leaking roofs and deteriorating bricks.² Consequently, for the past decade until 2014, NYCHA used primarily City Council discretionary funds to pay for cameras and other security enhancements, while NYCHA focused its capital budget on making much-needed structural repairs. Because City Council discretionary grants are generally targeted to Council Members' home districts, NYCHA was geographically limited regarding where it could use the funds, and unable to allocate funding based on the highest priority need for enhanced security at particular developments.³

From 1998 to 2009, NYCHA used "stand-alone" cameras that lacked motion sensors and did not feed into a remote system for viewing. With that older technology, NYCHA staff needed to inspect all security cameras individually to determine if they were functioning properly, and after an incident, had to manually retrieve on-site video data from the relevant camera to copy onto a DVD for viewing.

In December 2009, NYCHA formed a Task Force comprised of NYCHA tenant leaders, the New York City Police Department ("NYPD"), and representatives from other government agencies, to address concerns with the stand-alone cameras' limited technology.⁴ During the Task Force review process, through summer 2010, NYCHA put a hold on installing additional stand-alone cameras pending the recommendations of the Task Force.

In July 2010, a subcommittee of the Task Force presented its recommendations, which included replacing the stand-alone camera system with Closed Circuit Television ("CCTV") cameras. The Task Force subcommittee also recommended enhancing security through a Layered Access Control ("LAC") system that included electronic key tags (aka "fobs") which could be deactivated if a resident's key tag is lost or stolen, and installing intercoms that do not rely on telephone company infrastructure. From September to December 2010, the Task Force presented these recommendations to State and City elected officials.

Based on the Task Force's recommendations, NYCHA decided not to continue with its existing contracts for stand-alone cameras because the contracts did not include provisions for the purchase of CCTV, key tags, or intercoms. Instead, NYCHA met with various City Council Members who had previously allocated funding for cameras, and requested that the funds be "repurposed" to cover updated camera technology and layered access security systems. Consequently, by February 2011, NYCHA had amassed \$30 million in funds allocated by the City Council for enhanced security measures as early as Fiscal Year 2008.

² NYCHA's last physical needs assessment identified a \$17 billion need for structural capital improvements, but the agency has only \$2.5 billion in capital programming to address these needs.

³ See charts summarizing information provided by NYCHA Capital Projects Department and Research & Management Analysis Department in summer 2014, annexed as Appendix A, "NYCHA Top 20 Developments with the Highest Number of Crime Incidents as of 4/27/2014," and Appendix B, "Funding 2013-2014 Tracking Sheet CCTV," which show that camera deployment in the housing developments is not commensurate with crime rates.

⁴ The other government agencies included the NYC Special Narcotics Prosecutor, NYC Intergovernmental Affairs Office, Manhattan District Attorney's Office, Mayor's Community Affairs Unit, and the NYC Department of Youth and Community Development.

In July 2012, the issue of cameras at NYCHA housing developments received heightened attention in the aftermath of several well-publicized shootings on NYCHA grounds where cameras were not present. By August 2012, NYCHA had approximately \$42 million of unspent funds for CCTV and/or enhanced security measures for 50 developments. In August 2012, then-NYCHA Chair John Rhea testified before the City Council that NYCHA would install cameras for 50 developments by the end of 2013. NYCHA installed all the cameras for the 50 developments by the end of 2013, and all planned layered access controls by June 2014.

The issue of security measures at NYCHA once again re-entered the public spotlight on June 1, 2014, when a six-year-old boy was fatally stabbed and a seven-year-old girl was seriously injured in a violent attack in an elevator at NYCHA's Boulevard Houses. The NYPD faced challenges in identifying the suspect because there were no security cameras in the elevator, although money had been allocated for security cameras at Boulevard Houses in the City Council's Fiscal Year 2014 budget.⁵

In the aftermath of the Boulevard Houses attacks and the resulting increased media scrutiny of NYCHA's camera installation program, and following Mayor de Blasio's directive, City agencies processed the paperwork to register the camera contracts in less than two weeks, far shorter than the usual processing time. The quick processing time raised questions as to why camera contracts had not been processed as expeditiously in prior years, and whether the faster turnaround time could be sustained going forward.

The incident at Boulevard Houses and the absence of cameras in key locations illuminate one of NYCHA's biggest challenges: in an era of pervasive budget cuts⁶ combined with an increase in certain types of crime on NYCHA property,⁷ NYCHA is in dire need of funding for increased and up-to-date security measures. NYCHA has estimated that it would cost approximately \$520 million to install cameras, intercoms, new doors and other security measures in all of NYCHA's housing developments.⁸

In response to NYCHA's funding needs, Mayor de Blasio's first budget plan for 2014 forgave NYCHA the remainder of its annual payment to the City for police services, or \$52 million, and the 2015 budget similarly forgave \$70 million and directed these funds back to the agency to be used to clear the backlog of repair and maintenance needs.⁹

⁵ Boulevard Houses currently has five security cameras from prior funding that are concentrated in one of its 18 buildings. See Vivian Yee & Marc Santora, *After Boy and Girl Are Stabbed, Anger Over a Lack of Cameras*, NY TIMES, Jun 3, 2014 at A1.

⁶ In 2014, NYCHA is facing a General Fund deficit of \$191 million, primarily due to chronic Congressional underfunding of public housing, and rising employee entitlement costs. Over the coming five years, NYCHA anticipates cumulative operating deficits of \$1.19 billion. See NYCHA's Five-Year Operating & Capital Plans, Calendar Years 2014-2018, December 18, 2013, at 4, available at: http://www.nyc.gov/html/nycha/downloads/pdf/2014-2018_Five_Year_Operating_and_Capital_Plan.pdf.

⁷ See, e.g., Mireya Navarro & Nate Schweber, *Lack of Cameras in Public Housing Outrages Residents and DeBlasio*, NY TIMES, Jun 4, 2014, at A21. "About 20 percent of the city's violent crimes take place in public housing, police officials say, although the projects are home to only 5 percent of residents." Further, approximately two-thirds of the crimes committed on NYCHA property are violent crime, compared to one-third citywide. See Mireya Navarro & Joseph Goldstein, *Policing the Projects, at a Hefty Price*, NY TIMES, Dec 27, 2013 at A21.

⁸ Per NYCHA Executive Vice-President for Capital Projects Ray Ribeiro, based on estimate that needed security improvements would cost approximately \$200,000 per building, multiplied by NYCHA's 2,563 buildings.

⁹ See <http://www1.nyc.gov/office-of-the-mayor/news/049-14/fact-sheet-mayor-de-blasio-issues-preliminary-budget-fiscal-year-2015-the-city-s#0>; see also <http://www.nyc.gov/html/nycha/html/news/budget-testimony-20140603.shtml>.

In addition, on July 8, 2014, the Mayor’s Office announced a plan to invest \$210 million to reduce violent crime in NYCHA developments through more targeted law enforcement efforts, physical improvements, community engagement, and expanded work and education programs. This plan, known as the Mayor’s Action Plan (“MAP”) for Neighborhood Safety, focuses on the 15 developments that together account for 20% of all violent crime in NYCHA’s 334 developments. These funds include \$50 million for physical improvements to enhance security and \$1.5 million to install temporary exterior lighting.¹⁰ On August 28, 2014, Mayor de Blasio and the NYPD Housing Bureau Chief announced that major crimes at NYCHA developments had dropped since the previous year.¹¹

As of October 31, 2014, NYCHA has installed 11,035 security cameras, distributed as follows:

# DEVELOPMENTS WITH CCTV CAMERAS (TOTAL = 334)	# BUILDINGS WITH CCTV CAMERAS (TOTAL = 2,563)
165 (49%)	1,066 (42%)

In addition, NYCHA has installed Layered Access Control systems at 25 developments.

As of October 2014, out of 49 developments slated for security improvements with Fiscal Year 2014 funds, NYCHA has successfully completed security improvements at 28 developments. NYCHA expects to install all of the cameras funded under the City’s capital budget for Fiscal Year 2014 by the end of December 2014. NYCHA is also planning for additional security improvements to be installed using funding from Fiscal Year 2015.

¹⁰ The Mayor’s Office specifies: “The \$210.5 million investment consists of: \$122 million of City funds to relieve NYCHA of other obligations, so that money can be used for repairs and maintenance; \$50 million for physical improvements to enhance security; \$1.5 million for exterior lighting at the 15 developments; \$21.4 million for the civilianization of 200 police officers; and \$15.6 million to expand key programs to help build stronger individuals, families and communities.” *Office of the Mayor Fact Sheet: Making New York City’s Neighborhoods and Housing Developments Safer*, available at <http://www1.nyc.gov/office-of-the-mayor/news/336-14/fact-sheet-making-new-york-city-s-neighborhoods-housing-developments-safer/#/0> (last visited August 28, 2014). The Office of Management and Budget reports that the \$50 million in funding for physical security improvements is comprised of: a) \$25 million in discretionary mayoral funds, which are not geographically limited; b) \$15 million in directed City Council discretionary funds; and c) \$10 million in discretionary funds from the City Council Speaker, which is also not allocated to a particular location.

¹¹ See <http://www1.nyc.gov/office-of-the-mayor/news/853-14/transcript-mayor-de-blasio-expedited-removal-sidewalk-sheds-nycha-developments#/0>. For detailed data about crime rates at NYCHA developments, see NYPD Housing Bureau report, “Housing Bureau Crime Analysis/Detailed Crime Comparison” (Compstat period ending November 2, 2014), reporting a 6% drop in major crimes from 2013 to 2014.

From 1998 to the present time, NYCHA has installed or plans to install security cameras as follows:

CALENDAR YEAR(S)	# CAMERAS
1998 – 2012	6,131
2013	3,122
1/1/14-10/31/14	1,782
TOTAL INSTALLED TO DATE:	11,035
11/1/14-12/31/14	1,168 (projected)
TOTAL PROJECTED BY YEAR-END 2014:	12,203 (projected)

The following section describes the relevant procurement process as well as NYCHA’s efforts to install security improvements using City Council funds from Fiscal Year 2014.

II. The Process to Procure and Install CCTV and Other Security Enhancements

1) City Council Allocates Funding to NYCHA

In June of each year, the NYC Office of Management & Budget (“OMB”) provides NYCHA with a list of the City Council Members who will provide discretionary funds to NYCHA and the general purpose of the funds.

The OIG reviewed the list for Fiscal Year 2014 and found that it contained inconsistent language regarding the description of funds for CCTV. For example, some Council Members indicated that the money is for “Security Cameras,” whereas other Council Members indicated that the money is for “Layered Access” or a “Security Upgrade.” Moreover, other Council Members stated that the money is for the “complete installation of CCTV and layered access controls” for the development. When NYCHA needs funding clarification or its security plans change, the agency must obtain repurposing letters from the City Council that state that the money may be used for CCTV and other specified security improvements. By fall 2013, NYCHA received confirmation that the City Council had allocated \$25.7 million for Fiscal Year 2014 for CCTV and enhanced security at approximately 50 NYCHA housing developments.

2) NYCHA Bids Out Design and Construction Work

NYCHA initiates the process of bidding out and awarding contracts to companies: both professional services contracts to work with Capital Projects Division (“CPD”) to create designs for the security improvements, and construction contracts to perform the installation. For each housing development, NYCHA issues a task order to the construction contractor assigned to the geographic area where the housing development is located. NYCHA also has the ability to issue a task order for work at a particular development to a contractor that is assigned to a different geographic area.

In 2011, NYCHA implemented a new contracting method for security equipment contracts, called the Job Order Contract (“JOC”) system. JOC contracting is designed to expedite and reduce costs of routine construction work by creating a detailed, customized JOC catalog that establishes fixed unit prices for specific construction tasks, along with universal technical specifications. Contractors bid a multiplier of the fixed unit prices to cover their labor and materials costs, and are

awarded a contract for an indefinite quantity, as needed by the facility owner. Instead of developing separate design and technical specifications documents for each work location, facility owners issue a series of individual job orders to approved contractors. In addition to streamlining the contracting process, the JOC system provides an incentive for contractors to complete quality work, because they are "on-call" based on the owner's requirements.

In November 2011, NYCHA awarded a contract to The Gordian Group for \$1.4 million to develop a JOC system for NYCHA's security improvements needs.¹² CPD staff report that NYCHA's use of the JOC system greatly expedited the contracting process, because: 1) the JOC system is simpler than the traditional design-bid-build method; 2) NYCHA needs to administer only a limited number of master contracts, instead of numerous individual contracts for each work site; and 3) the JOC system gives NYCHA flexibility to award larger jobs to stronger contractors, while still using smaller contractors for appropriately-sized work.

For Fiscal Year 2014, on September 16, 2013, NYCHA opened bidding for prime contractors to install enhanced security measures at various developments, and on September 25, 2013, NYCHA's Board approved six master contracts as follows:

- Bronx – Various Developments: Charan Electrical Enterprises, Inc., for an amount not to exceed \$10 million;
- Queens – Various Developments: Charan Electrical Enterprises, Inc. for an amount not to exceed \$10 million;
- Manhattan South – Various Developments: SMS/Dudley – A Joint Venture, for an amount not to exceed \$10 million;
- Manhattan North – Various Developments: SMS/Dudley – A Joint Venture, for an amount not to exceed \$10 million;
- Brooklyn West & Staten Island – Various Developments: Midland Electrical Contracting Corp., for an amount not to exceed \$10 million; and
- Brooklyn East – Various Developments: Midland Electrical Contracting Corp., for an amount not to exceed \$10 million.¹³

The procurement cycle for these six contracts was approximately one month, versus a previous typical procurement cycle time for similar capital contracts of approximately four months.

¹² As the JOC contractor, The Gordian Group receives a percentage of the task order funds and a licensing fee for use of its JOC menu. On January 27, 2012, NYCHA and The Gordian Group executed an initial two-year contract, and on August 12, 2013, NYCHA exercised its one-year renewal option for an additional \$700,000.

¹³ Though these "Not To Exceed" (NTE) contracts totalled \$60 million citywide, subsequently the NYC Comptroller's Office and NYCHA negotiated procedures to ensure that the total work costs remain within the dollar amount budgeted by the City Council.

3) Development Residents Review the Security Plan

To review and approve each development's security plan, NYCHA works with resident leaders¹⁴ and other development residents, the NYPD, and the Council Member who allocated the funding. CPD provides the group with the full cost of cameras and security enhancements for the entire housing development, compared to the actual amount of City Council funds allocated for the housing development. CPD recommends where the cameras and layered access controls could be placed based on the available funds and provides residents with a graphical layout. In some cases, the group immediately approves CPD's recommended plan and the resident leader signs off on the plan. In other cases, there are numerous meetings to discuss proposed changes to CPD's plan.

In recent years, the average time for NYCHA to finalize plans with resident leaders has been approximately 90 days. For Fiscal Year 2014, CPD obtained assistance from NYCHA's Community Operations Department to help engage residents and expedite plan approval, and the average approval time shortened to 45 days.

4) Prime Contractors Submit Drawings and Detailed Cost Plan

After the resident leaders sign off on a plan, the prime contractor visits the site to measure the amount of conduit and wire for each location. The prime contractor creates drawings, an installation plan, and an itemized cost proposal and submits these documents to The Gordian Group for approval.

5) CPD Creates a Package for NYCHA's Budget & Financial Planning Department

Six staff members in CPD's City Capital Unit are responsible for the CCTV program. For each task order, CPD creates one package for NYCHA's Budget & Financial Planning Department ("Budget & Planning"), containing:

- Documents approved by The Gordian Group;
- Block & Lot numbers for the buildings receiving security improvements;
- A spreadsheet that contains information about how much it would cost to install cameras and other security enhancements if unlimited funding were available;
- A spreadsheet that contains information about the amount of cameras and other enhancements that can be installed with available funding;
- A SEQRA environmental review form¹⁵ from NYCHA's Technical Services Unit, which conducts a brief administrative review to ensure that the cameras and security enhancements will not have adverse environmental impact; and
- A New York City Department of Information Technology & Telecommunication ("DoITT") form, which CPD completes on-line to inform DoITT that NYCHA will be using new video management systems at the housing development. DoITT typically takes two to four weeks to issue its approval.

¹⁴Each NYCHA development has a Resident Association that is governed by an Executive Board elected by development residents. Resident Associations assume various roles of representing and organizing development residents.

¹⁵SEQRA stands for the State Environmental Quality Review Act.

6) *Budget & Planning Reviews Paperwork*

Budget & Planning has one staff member who works on the security enhancement paperwork. The staff person completes certain portions of an OMB Budget Code Questionnaire by inputting funding codes and providing information about prior City capital expenditures for that housing development. In order to provide the funding history, the staff person reviews NYCHA's Oracle financial database, the websites for City Council and OMB, internal documents, and letters from elected officials.

Budget & Planning sends the Budget Code Questionnaire to CPD to complete sections regarding the scope of work, useful life of the products purchased, building class, and pollution remediation, and the number of cameras and other equipment. CPD completes these sections of the questionnaire and returns it back to Budget & Planning.

7) *Budget & Planning Submits Documents to the Law Department*

Next, Budget & Planning submits the Budget Code Questionnaire and the SEQRA environmental review form to NYCHA's Law Department for review. After approval, NYCHA's Law Department returns the documents, along with the development property deed, back to Budget & Planning, which then submits the package to OMB via e-mail and regular mail.

8) *OMB Reviews Documentation and Issues Certificate to Proceed*

City Council capital funds for NYCHA security improvements are financed by long-term borrowings, such as bond financing.¹⁶ OMB conducts a review to ensure that there are funds available in the City budget to pay for the requested expenditures, and that the proposed work has a useful life of at least five years so that it may properly be classified as a capital project.¹⁷

OMB typically works on submissions on a first-come, first-served basis, but the office can also prioritize submissions based on needs at the time. OMB assigns each package to one of four Analysts in its Housing Unit, who confirms that the funds will be spent for the stated purpose, and obtains evidence of property ownership by NYCHA.¹⁸ OMB's Technology Unit also reviews the package to determine whether the capital funds will be used to pay for software licenses, and if so, staff will check whether City already possesses a license that could be used instead.

Ultimately, OMB provides NYCHA with a Certificate to Proceed, which contains information about the capital funds that are used for the expenditure, the budget line, and the budget code, among other information.¹⁹

¹⁶ See generally NYS Local Finance Law § 10.00, which allows municipalities to contract indebtedness for any municipal purpose.

¹⁷ See NYS Local Finance Law § 11.32, and NYC Comptroller's Directive 10, § 3.3, which require that capital projects must have an expected useful life of at least five years.

¹⁸ OMB must verify property ownership because NYCHA is not a City agency and the City's bond requirements mandate that the property where capital improvements are made will continue to be owned by NYCHA for the useful life of the improvement and that NYCHA does not transfer the property to another entity.

¹⁹ A Certificate to Proceed is an approval from OMB that sets forth the terms and conditions under which the capital project shall proceed and informs the Comptroller of the amount of obligations to be used for financing the capital project. See Independent

Historically, OMB took at least three months to issue Certificates to Proceed. For Fiscal Year 2014, NYCHA submitted five packages (generally one package per borough) to the OMB between February and May 2014.

Following the attack at Boulevard Houses on June 1, 2014, OMB approved four of the packages on June 2, 2014, and approved the fifth on June 3, 2014. OMB indicated that it prioritized the review of these submissions in the aftermath of the Boulevard Houses incident. Furthermore, OMB agreed to continue placing NYCHA's security requests at the "front of the line,"²⁰ with the goal of a 30-day OMB turnaround time. These efforts appear to be succeeding: for example, paperwork submitted by NYCHA for two developments on July 30, 2014 was approved by OMB on August 20, 2014.²¹

9) NYCHA's Accounting Department Prepares the Registration Package for the Comptroller

NYCHA's Budget & Planning informs NYCHA's Accounting & Fiscal Services Department ("Accounting Department") that OMB has issued the Certificate to Proceed. The Accounting Department prepares two registration packages for each task order: one registration package for the prime contractor that will perform the construction work, and a second registration package for The Gordian Group's services associated with the task order.²² Each registration package is submitted to the Comptroller's Office for registration.²³

The Accounting Department starts the process by using the City's FMS computer program to input information for each registration package. NYCHA works with the NYC Department of Housing Preservation & Development ("HPD") and the Comptroller's Office Bureau of Accountancy to get an "FN" code, which allows NYCHA to input information into FMS.²⁴ Each registration package has a different FN code and it takes three to five business days to receive each FN Code. FMS does not have a function that can override the need for the FN codes. Several years ago, it was decided that NYCHA's contracts and task orders would be listed as HPD contracts in FMS, although NYCHA has its own FMS agency code. Thus, for NYCHA's contracts and task orders, NYCHA

Budget Office, Understanding New York City's Budget: A Guide to the Capital Budget, *available at* <http://www.ibo.nyc.ny.us/iboreport s/IBOCBG.pdf> (last visited June 23, 2014).

²⁰ Interview with NYCHA General Manager Cecil House and NYCHA Chair and Chief Executive Officer Shola Olatoye on November 7, 2014. On November 14, 2014, NYCHA General Manager Cecil House reported that OMB and NYCHA have now developed a project tracking system, and that executive level staff at both agencies are now conducting regular meetings to ensure that projects are timely approved.

²¹ Reported by NYCHA Capital Projects staff on November 13, 2014.

²² See FN 12, *supra*.

²³ The City of New York's Procurement Policy Board Rules define "registration" as "The process through which the Comptroller (1) encumbers funds to insure that monies are available to pay vendors upon the satisfactory completion of contract work; (2) maintains a registry of City contracts and agreements; (3) presents objections if, in the Comptroller's judgment, there is sufficient reason to believe that there is possible corruption in the letting of the contract or that the proposed contractor is involved in corrupt activity, and (4) tracks City expenditures and revenues associated with those contracts and agreements."

²⁴ NYCHA must work with HPD and the Comptroller's Office to obtain the FN codes because NYCHA is not a City agency and cannot directly receive the FN codes.

inputs into FMS that HPD is the contracting agency, NYCHA is the contractor, and the company performing the actual work is listed as the subcontractor.

The registration package contains basic information about the contract and the contractor,²⁵ the procuring agency, the construction price and location, a fixed asset waiver letter, and OMB's Certificate to Proceed.

For Fiscal Year 2014, NYCHA issued 47 registration packages for the prime contractors and 47 for The Gordian Group, for a total of 94 registration packages. Although NYCHA creates all the documents for the registration package by computer, NYCHA prints out all the documents and hand-delivers the package to the Comptroller's Office to comply with the Comptroller's requirements.

In early June 2014, following the Boulevard Houses incident, nine staff members from NYCHA's Accounting Department and six staff members from HPD worked after-hours and over the weekend to input information into the FMS system in order to begin the registration process.²⁶ Staff were unable to input information into FMS for the task orders where the prime contractor was assigned to a borough other than the one listed in the prime contract. Under the impression that these task orders where the borough did not match the prime contract were erroneous, the staff began to input information in FMS so that the borough for the task order matched the prime contract. Within 3-4 days, beginning on June 6, 2014, NYCHA submitted 94 registration packages to the Comptroller's Office for registration.

10) The Comptroller's Office Registers the Contracts

The Comptroller's Office requires that agencies submit registration packages by hand-delivery to the Comptroller's Office Central Imaging Facility.²⁷ The office is open during regular business hours and the Comptroller's staff must input information about the submission. The Comptroller's staff then takes the package to another area to be scanned into the Comptroller's OASIS system, which alerts the Comptroller's Bureau of Contract Administration staff that the package is ready for review.

The Comptroller's Office has 30 days to approve the registration package. The staff ensures that the requisite documents are included and contain the appropriate information. The staff also checks the Vendex database to find any adverse information on the contractors. Depending on the task order, engineers employed by the Comptroller's Office may conduct a review.

For Fiscal Year 2014, the Comptroller's Office registered these task orders within five days or less. The Comptroller's Office informed the OIG that these submissions were prioritized in the aftermath of the Boulevard Houses incident.

²⁵ See PPB Rules §2-12, which require the agency to submit: 1) the contractor's name and other identifying information, 2) the worksite location, 3) the dollar amount (including the original expenditure and revised expenditure), 4) the type of good or service procured, 5) the agency's name, 6) the contract term (including start and end date), 7) the source selection method and if the selected vendor was the lowest bidder, and 8) the number of responses to the solicitation. NYCHA provides this information by completing fields in FMS.

²⁶ Although FMS typically shuts down at 6 pm, FMS was kept open so that NYCHA could register the CCTV task orders.

²⁷ See Comptroller's Office Contract of Administration's A Guide to the Contract Registration Process, available at <https://comptroller.nyc.gov/wp-content/uploads/documents/ContractRegistrationGuide-2012.pdf> (last visited Jul. 17, 2014).

When NYCHA staff realized that some of the task orders had been assigned to the wrong prime contract, NYCHA “de-funded” the registered erroneous task orders, corrected and then re-registered them.

11) Construction Phase

CPD launches the construction phase with a pre-start meeting at the job site, attended by resident leadership, the prime contractor, CPD staff, and the construction management firm hired to supervise the construction phase.²⁸ The parties discuss construction issues at the pre-start meeting, such as the location of the construction staging area, the employees assigned to the job, and site safety.

Construction work on CCTV cameras consists of installing and testing vandal-resistant conduit, low- and high-voltage wiring, fiber optic infrastructure, integrating equipment, shelving and brackets. Because CCTV cameras require an independent electrical receptacle to be installed in every building in the development, a licensed Master Electrician is required to obtain electrical permits. After all supporting infrastructure has been installed, the contractor places the security camera into its bracket last, so that if it is vandalized, there is a functioning system in place to record the event.

CPD’s recommended timeframe to install cameras and layered access controls is as follows:

Dollar Value of Job	Number of Months
Less than \$250,000	3 months
\$250,000 to \$500,000	4 months
\$500,000 to \$1 million	5 months
Greater than \$1 million	6 months

However, the actual timeframe for the work varies based on the number of jobs that the contractor has at a given time.

CPD coordinates with NYCHA’s Office of Safety & Security to implement the key fob systems, and with NYCHA’s IT Department concerning the software system that links residents’ phone numbers with the door intercoms. Once the cameras and other security upgrades are installed and functioning, NYCHA’s Technical Services Department assumes responsibility for operating the security program.

12) NYCHA Pays Invoices and Seeks City Reimbursement

NYCHA’s Accounting Department regularly checks FMS to determine when the Comptroller’s Office has registered the contract, and enters the information onto NYCHA’s Oracle financial recordkeeping system.

NYCHA uses its own funds kept in a reserve account to pay the invoices generated by the prime contractors under the CCTV program. In order to be reimbursed, the Comptroller’s Office

²⁸ NYCHA uses federal capital funds to pay for the construction management firm’s services.

requires that a licensed professional engineer review the invoices to ensure that the work was actually performed. NYCHA has an on-staff engineer who performs the verification and signs the paperwork, which is submitted to HPD for each invoice paid out by NYCHA. Subsequently, HPD wires the money to NYCHA for each invoice, at which point the process for the task order is complete.

III. Investigative Findings and Recommendations

The OIG's review found that from the funding allocation to the construction phase, many NYCHA departments and external City agencies review and approve the installation of CCTV and other security improvements at NYCHA. Within NYCHA, CPD, the NYCHA Board, resident representatives, Community Operations, Budget & Financial Planning, Technical Services, the Law Department, Accounting & Fiscal Services, Office of Safety & Security, and the IT Department are all involved in procurement and construction, as well as NYCHA's CCTV JOC contractor The Gordian Group.

This process is made more complex because NYCHA's security improvements program historically was funded by City Council discretionary funds, which necessitated the further involvement of City Council Members, OMB, and the City Comptroller's Office, as well as HPD. While the decision by various council members to step in and use their discretionary funds to cover these shortfalls is commendable, it cannot substitute for a systemic program of properly directing funding to the most needed projects. In the past, it has generally taken many months and sometimes years for security improvements to move from a City Council Member's funding allocation to installation. In summer 2014, following a widely-publicized attack on two children in NYCHA's Boulevard Houses, NYCHA and involved City agencies responded with alacrity and succeeded in moving contracts through OMB, the Comptroller's Office, and other approval steps in less than two weeks. These approvals were processed much more quickly than usual because of a decision to prioritize these contracts at a particularly sensitive time. It is crucial to sustain this rate of progress by ensuring that NYCHA's submissions comport with City requirements and that external agencies continue to prioritize NYCHA's security-related funding requests.

The OIG recommends that, going forward, NYCHA should simplify and expedite its approval process for security improvements. Specifically, OIG recommends the following changes:

- A. NYCHA and City agencies should continue to expand and diversify funding streams to pay for CCTV and other security upgrades.

For over 10 years since federal funding was terminated, NYCHA has relied primarily on individual City Council Member monies to fund security improvements, and thus has been geographically restricted regarding where it could site updated and additional security equipment. NYCHA also receives federal and city capital funds, which it directs towards urgent building needs such as leaking roofs. The City and OMB must seek alternative long-term funding streams to pay for these needed security upgrades.

In 2014, the Mayor's Office's MAP Plan for Neighborhood Safety directed \$210 million to reduce crime in NYCHA developments through expanded law enforcement, employment and other social services, and over \$50 million in physical security improvements. NYCHA should continue to work with the City to identify potential sources of funding for security needs.

NYCHA may also wish to consider the feasibility of expending capital or other available funds to pay up-front for CCTV and other security enhancements, and then subsequently applying for reimbursement from the City. Although some security expenses may ultimately be deemed ineligible for reimbursement as capital expenditures, NYCHA could assume this risk in order to begin work earlier in the fiscal year cycle.

B. NYCHA should develop a strategic City-wide security improvements plan based on need.

By relying on City Council discretionary funding, NYCHA has historically been limited to providing security upgrades in particular council districts, and has been unable to direct security funding towards high-crime developments. The \$50 million allocated for security equipment from the MAP Plan for Neighborhood Safety thus presents an important opportunity for NYCHA to target 15 designated developments with security improvements as well as expanded services. NYCHA should use any additional security funds to develop a strategic City-wide security improvements plan based on factors such as emergency security problems, buildings and developments that have received less than their “fair share” of CCTV and other security upgrades, and requests for security improvements that have been pending for a lengthy period.

C. NYCHA should streamline the security equipment procurement process both within involved NYCHA departments as well as with external City agencies.

The OIG identified several inefficiencies in the procurement process which should be streamlined, including:

- Historically, NYCHA has not been able to move forward immediately upon notification of available City Council funds, because some descriptions of the line items have been ambiguous. NYCHA should work with the City Council to develop standardized language that specifically stipulates that CCTV and layered access controls may be purchased with the funds.
- The Capital Projects Department should refrain from designating specific boroughs for prime contracts for security improvements. This will provide CPD with the flexibility to assign task orders to prime contractors as needs arise, without being required to reprocess paperwork.
- NYCHA has created a City Capital Projects unit within its Capital Projects Department that is solely responsible for City-funded capital contracts. Currently, 11 CPD staff members work on security equipment procurement for both current and future funding streams. This staffing should be expanded, so that CPD staff members could be dedicated exclusively either to implementing current projects, or to planning and developing future projects.
- When preparing submissions to OMB, staff from NYCHA’s Budget & Planning Office should themselves research and print property deeds from the public New York City Automated City Register Information System (“ACRIS”), instead of requesting assistance from NYCHA’s Law Department. Budget & Planning should also work with OMB staff to develop acceptable boiler-plate exemplary language needed to successfully complete OMB’s Budget Code Questionnaire. In addition, NYCHA and OMB should continue to ensure that OMB sustains its recent gains in shortening its response time to a 30-day turnaround.

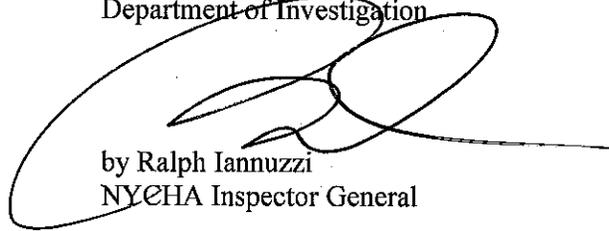
- NYCHA should increase Accounting Department staff trained in the City's FMS system and consider adding additional FMS terminals. NYCHA should request a blanket "FN" code to be entered into the FMS system, so that the Accounting Department no longer needs to request and wait for an individual FN code for each task order. Likewise, NYCHA should determine whether it can use its own agency code to enter contract information into FMS, instead of reporting that HPD is the contracting agency, in order to eliminate HPD's involvement.

Thank you for your attention to this report. The Office of the Inspector General would also like to thank NYCHA's Capital Projects Department, Budget & Financial Planning Department, and Accounting & Fiscal Services Department, as well as the NYC Office of Management & Budget and the NYC Comptroller's Office, for providing the information for this review.

If you have any questions or wish to discuss this review, please contact NYCHA Inspector General Ralph Iannuzzi at (212) 806-8316. Furthermore, please notify the Inspector General whether NYCHA intends to implement the above-mentioned policy and procedure recommendations.

Very truly yours,

Mark G. Peters
Commissioner
Department of Investigation



by Ralph Iannuzzi
NYCHA Inspector General

- cc: Cecil House, NYCHA General Manager
Ray Ribeiro, NYCHA Executive Vice-President for Capital Projects
Richard Couch, NYCHA Chief Financial Officer
Victor Martinez, NYCHA Senior Vice-President and Chief Supply Officer
- Alicia Glen, NYC Deputy Mayor for Housing and Economic Development
Dean Fuleihan, Director, NYC Office of Management and Budget

Appendix A

NYCHA TOP 20 DEVELOPMENTS WITH THE HIGHEST NUMBER OF CRIME INCIDENTS AS OF 4/27/2014

Development	Existing Cameras	FY 2014 Funding	Incidents 2014	2014 Crime Rate
BREUKELEN	10	0	30	8.2
QUEENSBRIDGE N & S	360	0	28	4.2
RED HOOK E & W	181	0	26	4.2
BUSHWICK	84	0	25	8.6
CASTLE HILL	312	0	25	5.0
FARRAGUT	80	\$183K	22	6.7
BROWNSVILLE	355	0	22	6.7
INGERSOLL	18	0	21	5.3
WAGNER	267	0	21	4.3
SOUNDVIEW	0	\$500K	20	6.6
RIIS COMBINED	182	0	20	5.0
JEFFERSON	10	0	19	5.3
LINDEN	0	0	19	5.0
DOUGLASS I, II, & ADD.	62	\$100K	19	4.2
BARUCH & ADD.	126	0	19	3.5
ALBANY I & II	101	0	18	6.0
WHITMAN	11	0	17	4.5
MARLBORO	48	\$1.4M	17	4.1
LINCOLN	0	\$2M	16	5.4
KING TOWERS	196	0	16	5.2

Appendix B

Funding 2013- 2014 Tracking sheet CCTV							
Name of Development	Total Budget Amount	Existing cameras as of 06/05/2014	2014 Crime Rate as of 6/1/2014	2013 Crime Rate as of 6/1/2014	2014 Incidents as of 6/1/2014	2013 Incidents as of 6/1/2013	Comments
Manhattan							
BARUCH HOUSES	\$350,000	112	3.89	3.47	21	19	CRIME DATA IS COMBINED FOR BARUCH & BARUCH ADDITION. BARUCH ADDITION HAS ADDITIONAL 14 CAMERAS
BARUCH HOUSES	\$350,000						
DE HOSTOS	\$183,000	11	2.08	8.13	1	4	
DOUGLASS HOUSES	\$100,000	59	4.60	2.84	21	13	CRIME DATA IS COMBINED FOR DOUGLASS I, II, AND ADDITION
EAST RIVER HOUSES	\$200,000	16	3.29	4.13	8	10	
HARBORVIEW TERRACE	\$412,000		3.06	6.11	2	4	
JOHNSON HOUSES	\$100,000	49	4.78	7.13	15	22	
LINCOLN	\$2,000,000		5.99	9.40	18	28	
WSURA A (120 W. 94 ST)	\$208,000		4.29	1.71	5	2	CRIME DATA IS COMBINED FOR WSUR (BROWNSTONES) & WSUR (SITE A) 120 WEST 94TH STREET & WSUR (SITE B) 74 WEST 92ND STREET & WSUR (SITE C) 589 AMSTERDAM AVENUE

WSUR B (74 W 94 ST)	\$208,000		4.29	1.71	5	2	CRIME DATA IS COMBINED FOR WSUR (BROWNSTONES) & WSUR (SITE A) 120 WEST 94TH STREET & WSUR (SITE B) 74 WEST 92ND STREET & WSUR (SITE C) 589 AMSTERDAM AVENUE
WSUR C (589 AMSTERDAM)	\$208,000		4.29	1.71	5	2	CRIME DATA IS COMBINED FOR WSUR (BROWNSTONES) & WSUR (SITE A) 120 WEST 94TH STREET & WSUR (SITE B) 74 WEST 92ND STREET & WSUR (SITE C) 589 AMSTERDAM AVENUE
IRA ROBBINS SENIOR HOMES	\$150,000		12.42	0.00	2	0	
TAFT REHAB HOUSES	\$450,000		0.00	0.00	0	0	
99 FORT WASHINGTON	\$ 350,000	2	2.78	5.38	3	6	CRIME DATA IS COMBINED FOR FORT WASHINGTON AVENUE REHAB+WASHINGTON HEIGHTS REHAB (GROUPS 1&2)+WASHINGTON HEIGHTS REHAB PHASE III+WASHINGTON HEIGHTS REHAB PHASE IV ©+WASHINGTON HEIGHTS REHAB PHASE IV
VLADECK HOUSES	\$529,000	283	1.70	2.86	6	10	CRIME DATA IS COMBINED FOR VLADECK & VLADECK II
CORSI HOUSES	\$270,000	15	5.56	21.98	1	4	
Bronx							
ADAMS HOUSES	\$506,000		6.21	6.34	15	15	
BAILEY HOUSES	\$56,000	12	6.54	2.15	3	1	

BETANCES	\$225,000		3.93	5.81	7	10	CRIME DATA IS COMBINED FOR BETANCES I & VI, (MOTT HAVEN MODEL CITIES (BETANCES II-V)) - 1000 PEOPLE)
BRONXCHESTER	\$313,000	2	6.18	0.00	4	0	
CLAREMONT-FRANKLIN HOUSES	\$200,000		3.00	2.54	6	5	CRIME DATA IS COMBINED FOR UNION AVENUE CONSOL (UAC7): CLAREMONT PARKWAY-FRANKLIN AVENUE + DAVIDSON + SOUTH BRONX AREA (SITE 402)+STEBBINS AVENUE-HEWITT PLACE+UNION AVENUE-EAST 163RD STREET+UNION AVENUE-EAST 166TH STREET
DAVIDSON HOUSES	\$412,000		3.00	2.54	6	5	CRIME DATA IS COMBINED FOR UNION AVENUE CONSOL (UAC7): CLAREMONT PARKWAY-FRANKLIN AVENUE + DAVIDSON + SOUTH BRONX AREA (SITE 402)+STEBBINS AVENUE-HEWITT PLACE+UNION AVENUE-EAST 163RD STREET+UNION AVENUE-EAST 166TH STREET
EASTCHESTER GARDENS – UPGRADES	\$325,000		3.80	0.93	8	2	
EASTCHESTER GARDENS - ENHANCEMENTS	\$650,000						
FORT INDEPENDENCE	\$390,000	26	5.28	3.94	4	3	
MARBLE HILL HOUSES	\$207,000	53	4.48	3.86	15	13	
MCKINLEY HOUSES	\$860,000		5.39	5.37	9	9	CRIME DATA IS COMBINED FOR MCKINLEY+ EAGLE AV-EAST 163RD ST
MIDDLETOWN PLAZA	\$80,000	7	0.00	0.00	0	0	

MILLBROOK*	\$433,000	18	2.15	3.46	8	13	CRIME DATA IS COMBINED FOR MILL BROOK+MILL BROOK EXTENSION+MOTT HAVEN MODEL CITIES (500 PEOPLE)
MITCHEL HOUSES	\$555,000	20	1.97	3.95	9	18	CRIME DATA IS COMBINED FOR MITCHEL+MOTT HAVEN MODEL CITIES (500 PEOPLE)
	\$500,000		0.00	3.74	0	2	THIS CRIME DATA IS REPORTED FOR EAST 180TH STREET-MONTEREY AVENUE DEVELOPMENT
PATTERSON HOUSES	\$470,000	150	4.56	5.72	20	25	
PELHAM PARKWAY	\$3,321,000		0.78	3.51	2	9	
SOUNDVIEW	\$500,000		8.25	6.64	25	20	
THROGGS NECK	\$750,000		3.83	1.74	13	6	CRIME DATA IS COMBINED FOR THROGGS NECK & ADDITION
Brooklyn							
BOULEVARD HOUSES	\$500,000	5	4.99	7.36	14	21	
BORINQUEN PLAZA	\$1,054,000	170	4.28	9.77	10	23	CRIME DATA IS COMBINED FOR BORINQUEN PLAZA I & II
CYPRESS HILLS HOUSES	\$500,000	7	3.16	3.20	11	11	
FARRAGUT	\$183,000	20+80	7.96	4.29	26	14	THERE ARE ADDITIONAL 80 CAMERAS AS LOBBY INITIATIVES
HOPE GARDENS	\$389,000	43	4.02	5.41	11	15	CRIME DATA IS COMBINED FOR HOPE GARDENS & BUSHWICK (GROUP A&C,B&D, AND SITE E)

HYLAN	\$312,000	35	N/A	N/A	N/A	N/A	
MARLBORO	\$1,407,000	48	5.06	3.13	21	13	
SHEEPSHEAD/NOSTRAND	\$1,369,000	20/23	2.87/2.98	6.97/3.33	7/7	17/8	
SUMNER HOUSES	\$875,000		6.33	9.38	15	22	
TAYLOR WYTHE HOUSES	\$100,000	26	2.32	3.07	3	4	
TILDEN HOUSES	\$248,000	120	5.68	6.90	15	18	
Queens							
BAISLEY PARK	\$360,000	10	3.35	3.30	3	3	
BEACH 41ST HOUSES	\$500,000		5.30	5.36	9	9	
OCEAN BAY/EDGEMERE HOUSES	\$900,000		3.86	3.20	14	12	
LATIMER GARDENS	\$200,000	44	2.47	1.25	2	1	
	\$25,718,000.						