

Office of the
NYCHA FEDERAL MONITOR
Bart M. Schwartz
Pursuant to Agreement dated January 31, 2019
415 Madison Avenue
11th Floor
New York, New York 10017
212.817.6733

Transmittal

To: Greg Russ, Chair and CEO, NYCHA, via email:
Gregory.Russ@nycha.nyc.gov
Rob Yalen, AUSA, SDNY, via email:
Robert.Yalen@usdoj.gov
Daniel W. Sherrod, via email:
Daniel.W.Sherrod@hud.gov

From: Bart M. Schwartz NYCHA Federal Monitor

Date: October 30, 2019

Subject: Transmittal of Approved Action Plan -PHAS Inspections

Transmitted herewith, after consultation with each of your offices, attached you will find in final version, NYCHA *Action Plan-PHAS Inspections*, pursuant to ¶ 62.h. and subject to ¶¶ 36 through 43 of the Agreement, which I as Monitor have approved.

Please contact either Joseph Jaffe or Mary Stutzman should you have any questions.

Thanks to all of you for your efforts and help in completing this.

Bart M. Schwartz

Action Plan – PHAS Inspections

Introduction

The settlement agreement between HUD, the U.S. Attorney's Office for the Southern District of New York (SDNY), the New York City Housing Authority (NYCHA), and the City of New York (the "Agreement"), addresses the integrity of PHAS Inspections.¹

Obligation: The Agreement states that "NYCHA will not use deceptive practices with respect to PHAS Inspections, will make all improvements in accordance with [HUD's Inspector Notice] No. 2016-03, Uniform Physical Condition Standard (UPCS) Deficiencies and Industry Standard Repairs, July 11, 2016², or any subsequent or superseding guidance; will ensure that all maintenance repairs are performed to established industry standards and workmanship; and will ensure that properties meet HUD's decent, safe, sanitary, and in good repair standards at all times." See Agreement, VI.F.¶60.

The Agreement also requires that "NYCHA shall design internal controls to prevent deceptive practices 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." See Agreement, VI.F.¶61.

NYCHA's Compliance Department is responsible for ensuring the integrity of PHAS Inspections and other inspections at NYCHA.³ See Agreement, VI.C.¶53(e). NYCHA's Chief Compliance Officer is responsible for preventing deceptive practices with respect to PHAS Inspections and ensuring compliance with HUD regulations and guidelines with respect to PHAS Inspections. These responsibilities include, but are not limited to:

¹ While the Agreement uses the term PHAS inspections, the physical inspection component of the PHAS is technically referred to as the REAC inspection. The Real Estate Assessment Center's (REAC) mission is to provide and promote the effective use of accurate, timely and reliable information assessing the condition of HUD's portfolio; to provide information to help ensure safe, decent and affordable housing; and, to restore the public trust by identifying fraud, abuse and waste of HUD resources. https://www.hud.gov/program_offices/public_indian_housing/reac. For purposes of this Action Plan the terms PHAS Inspections and PHAS REAC Inspections are used interchangeably.

² The Agreement cites to PIH Notice 2016-03. See Agreement, VI.F. ¶ 60. This PIH notice does not pertain to PHAS Inspections but instead provides guidance on the "Emergency Safety and Security Grants Annual Funding Notification and Application Process." The correct notice - HUD's Inspector Notice 2016-03 - is referenced in this Action Plan.

³ While this is a reference to the Agreement, NYCHA recognizes that many departments at NYCHA share the responsibility for ensuring the integrity of inspections, with the Vice-President of Public Housing Operations taking the lead on PHAS Inspections. Responsibility for the overall PHAS Inspection and reporting functions resides with the Executive Vice-President of Operations, as head of the Operations Department.

- Ensuring that training is provided to NYCHA employees on the regulations and guidelines with respect to PHAS Inspections, including in particular, the importance of not committing deceptive practices in PHAS Inspections.
- Routinely advising employees to report deceptive practices or otherwise improper PHAS practices to the Chief Compliance Officer.⁴
- Investigating such complaints, as well as forwarding such complaints to HUD and SDNY, and otherwise as required by applicable law.
- Working with the Quality Assurance Unit (QA Unit) to identify instances of improper work in connection with a PHAS Inspection (provided, however, that the QA Unit's role is to identify maintenance needs and ensure the quality of work done throughout the year, and not to perform pre-PHAS maintenance itself).
- Reviewing available data to identify any instances of improper work in connection with a PHAS Inspection, including, but not limited to, those identified by the QA Unit.
- Recommending discipline for any managers or staff who conduct deceptive practices in PHAS Inspections.
- Ensuring that residents, contractors, and employees are aware that they can at any time raise issues with any other federal, state, or government entity.

See Agreement, VI.F.¶62.

NYCHA's QA Unit is required to review work performed by NYCHA employees throughout the year to determine whether the quality of the work meets industry standards. See Agreement, VI.E.¶57(d). The QA Unit's role is to identify maintenance needs and ensure the quality of work done throughout the year; not to itself perform maintenance before a PHAS Inspection. See Agreement, VI.F.¶62(d).

⁴ The Agreement requires the establishment of "forums" for receipt of complaints from stakeholders regarding compliance issues. NYCHA has now established multiple avenues through which stakeholders may submit concerns regarding PHAS Inspections and deceptive practices, among other things. The Compliance Department has developed protocols for the investigation and resolution of those concerns.

Work Group:

Agreement Pillar Team – PHAS/Apartment Inspections

The Agreement Pillar Team is led by the Vice-President for Public Housing Operations. NYCHA is currently in the process of appointing leads for the supporting team composed of the following major stakeholders and other supporting departments, as applicable:

- Compliance
- Quality Assurance
- Environmental Health & Safety
- Performance Tracking and Analytics
- Procurement
- Law
- Information Technology
- Finance
- Human Resources
- Capital
- Community Engagement & Partnerships
- Communications

The Agreement Pillar Team is accountable for compliance with the Agreement and the Action Plan. The team's responsibilities include:

- Reporting at least monthly to the Risk Advisory Council (co-chaired by the Chair and General Manager) and to the Monitor;
- Developing the plan to achieve compliance with the Agreement and related action plans on schedule or as close to schedule as feasible;
- Creating and maintaining risk trackers that transparently identify non-compliance with areas of the Agreement and/or Action Plan; and
- Identifying and resolving obstacles to achieving full Agreement compliance and engineering the execution of feasible solutions.

<p>Detail of Obligation: (specific references are to paragraphs of the Agreement or its Exhibits)</p>	<p>See Agreement ¶153.e, ¶157.d, and ¶¶60-62</p>
<p>Objectives:</p>	<ol style="list-style-type: none"> 1. Provide housing that is decent, safe, sanitary and in good repair throughout the year for all residents and thereby reduce deficiencies. 2. Eliminate and prohibit deceptive practices with respect to PHAS REAC Inspections by implementing the Actions mentioned in this Plan. 3. Revise and distribute Standard Procedure 040:18:1, with the new title, <i>Repair Standards & PHAS REAC Inspections</i> to provide staff with standardized responsibilities by title wherever possible, with instructions, and approaches to PHAS REAC Inspections. 4. Increase staff awareness and knowledge of UPCS, the industry repair standards in HUD Inspector Notice No. 2016-03, and other regulations and guidelines with respect to PHAS REAC Inspections and deceptive practices. 5. Change NYCHA organizational culture to improve individual accountability and responsibility for specified tasks and improve its reputation with HUD, employees, residents, and the general public through ongoing communication and education plans. 6. Enhance Maximo with system controls to ensure that only emergency work orders can be created for common areas and selected or alternate units during PHAS REAC Inspections.

Summary of Planned Action:

NYCHA must establish a culture that clearly emphasizes that using deceptive practices in relation to PHAS REAC Inspections or in other activities is never acceptable. NYCHA is developing and implementing standards in this Action Plan to change the culture of compliance to ensure that NYCHA management and staff understand their responsibilities and never use deceptive practices such as covering up or hiding conditions and false reporting either with respect to PHAS REAC Inspections or in the performance of any maintenance and repair work throughout the year. As Operations, the Environmental Health & Safety Department (EH&S), the QA Unit, and the Compliance Department identify deficiencies, recommendations for corrective action will be made to make changes to the process within a given timeframe.

NYCHA supervisors at all levels must restate the following with frequency: Repairs and maintenance are year-round functions; performing extraordinary “just-in-time” repairs prior to a PHAS REAC Inspection to meet minimal compliance thresholds is unacceptable; and NYCHA must strive to maintain its developments in accordance with UPCS and established industry repair standards.

NYCHA’s efforts to meet its obligations under the Agreement and achieve its objectives as stated in this Action Plan is a multipronged approach that includes action items for the Compliance Department, Operations, QA Unit, EH&S, and Human Resources Department’s Learning and Development Unit. The head of each is responsible and accountable to achieve these efforts.

In its oversight capacity, the Compliance Department in consultation with the Executive Vice-President of Operations and the Agreement Pillar Team will evaluate whether the actions developed in this Action Plan effectively build procedures to ensure that NYCHA meets its PHAS obligations with integrity via the following regular reporting:

- Semi-Annual PHAS Action Plan Evaluation Report

The first PHAS Action Plan Evaluation Report will be completed by December 31, 2019 for submission to the Risk Advisory Council (co-chaired by the Chair and General Manager) and to the Monitor. The methodology of the evaluation will include but not be limited to:

- Confirming compliance with the objectives and actions in this Action Plan.
- Input and analysis from the Agreement Pillar Team with regard to the plan's effectiveness.
- Surveys sent to Regional Asset Managers, Property Managers, and Property Maintenance Supervisors to gauge their approach to:
 - Meeting UPCS and industry repair standards year-round
 - Preparing for PHAS REAC Inspections
 - Creating a culture of compliance
 - Ensuring staff awareness of NYCHA's obligation to provide residents with decent, safe, and sanitary living conditions in good repair
- Reviewing QA Unit inspection findings.
- Comparing prior year PHAS REAC Inspections scores to current year scores.
- Conferring with the HUD Real Estate Assessment Center for feedback from HUD inspectors.

The PHAS Action Plan Evaluation Report will also include recommendations to address both non-compliance and improvement of the Action Plan and will be posted on NYCHAConnect. At the conclusion of one year following the acceptance of this Action Plan, NYCHA will review action components and assess the processes set forth hereafter, with a view towards streamlining, if appropriate, and enhancing effectiveness and promoting efficiencies.

- Monthly Summary Report

The summary report will be submitted to the Vice-President for Public Housing Operations and to the Monitor. The report will identify major activities, what was planned but not executed, and any key issues that must be flagged or escalated.

Action 1 – Update Standard Procedure

By December 19, 2019, NYCHA will update *Standard Procedure 040:18:1, Preparing for PHAS Inspections* (effective 12/13/2018), in order to provide staff with standardized instructions, an awareness of their responsibilities and the requirements for PHAS REAC Inspections. That update also will address the Compliance Department's role in ensuring the integrity of PHAS REAC Inspections as delineated in the Agreement and provide additional specificity as to the roles and responsibilities of Operations.

The Compliance Department will submit the final draft of the Standard Procedure to the Monitor for review and approval by November 8, 2019.

1. Compliance Department and Operations

The Compliance and Operations Departments are leading the effort to update and improve the procedures affecting PHAS REAC Inspections. This committee includes the QA Unit, Law Department, and the Performance Tracking and Analytics Department.

In addition to the Standard Procedure being renamed "*Repair Standards & PHAS REAC Inspections*" updates to the procedure will include:

- The actions required to deter and prevent deceptive practices described in this Action Plan.
- Adding language based on PIH Notice 2019-02 to emphasize that maintaining developments to meet UPCS is a year-round practice and that extraordinary "just-in-time" repairs to meet minimal compliance thresholds during a PHAS REAC Inspection are prohibited.
- Reorganizing the Standard Procedure to add a new Repair Standard subsection in order to emphasize that all repairs at all times during the year must be completed according to industry standards and workmanship described in HUD Inspector Notice No. 2016-03.

- Changing the timelines for staff to notify residents and conduct walk-throughs from 30 days to 10 days prior to a PHAS REAC Inspection because according to PIH Notice 2019-02 PHAs will now be notified 14 days before a PHAS REAC Inspection.

Action 2 - Training NYCHA Staff

NYCHA will train relevant NYCHA staff in the UPCS, the industry standards set forth in HUD Inspector Notice No. 2016-03, and any other regulations and guidelines with respect to PHAS REAC Inspections and deceptive practices.

The Compliance Department, the Operations Department, and the Learning and Development Unit of the Human Resources Department will meet NYCHA's training obligation with regard to PHAS REAC Inspections and the UPCS (see Agreement VI.F.¶62(a)) in three phases:

PHASE 1: NYCHA issued an RFP on May 14, 2019 and awarded a contract on June 30, 2019, which now will provide training to 1,700 employees. Each class will consist of 25 students and last for 3 consecutive days. The PHAS/UPCS training started in October 2019 and it is anticipated that approximately 1,700 employees will have completed the training by September 2020.

Training includes, but is not limited to:

- o An overview of the UPCS including maintenance and repair standards for the site, building exterior, building systems, common areas, and units
- o Methods to identify and complete repairs using industry standards including those in HUD Inspector Notice 2016-03
- o An overview of PHAS
- o Explanations of emergency health and safety issues and how to address such issues before and during PHAS REAC Inspections

All staff in the following NYCHA titles will attend the mandatory 3-consecutive day comprehensive training on PHAS REAC Inspections:

- Property Management Department Director
- Regional Asset Manager
- Property Management Department Deputy Director
- Skilled Trades Administrator
- Property Manager
- Property Maintenance Supervisor
- Assistant Property Maintenance Supervisor
- Maintenance Worker
- Other titles within the Compliance Department, EH&S, the Human Resources Department, the Performance Tracking and Analytics Department, and the QA Unit

At the end of the training, each staff member is required to take a PHAS/UPCS Certification Exam. If the staff member does not pass the exam on the first attempt, they have two additional opportunities to study course materials and retake the test. Staff who do not pass the test after three attempts are required to attend two semi-annual technical assistance training sessions provided by the Compliance Department which will then assess the employee's level of understanding and any further follow-up with that staff member.

- *PHASE 2:* By September 2020, NYCHA will begin rolling out the mandatory PHAS/UPCS comprehensive training to approximately 3,000 additional staff, primarily caretakers. The training will be modified as a two-day training with a focus on how UPCS and PHAS impacts caretakers in their day-to-day work. No exam will be given but a certificate of completion will be awarded.
- *PHASE 3: Ongoing New Employee Training and Annual Online Refresher Training*
 - Commencing October 2020, NYCHA will provide through a third-party vendor, on an ongoing basis, the above mandatory in-person PHAS/UPCS training (3-day and UPCS Certification Exam) to new employees who perform or supervise maintenance and repair work; and

- o NYCHA's Human Resources Department will begin to provide a yearly three-hour online web-based refresher training to employees who completed the in-person PHAS/UPCS training.

Action 3 - Develop a Robust Communications Plan to Educate Staff about PHAS Requirements

NYCHA shall routinely and frequently instruct employees not to use deceptive practices such as covering up or hiding conditions that need repair, making false reports or deliberate omissions about their work and will explain the potential consequences if they do so. NYCHA will advise employees to report deceptive practices and identify how that can be done. NYCHA also will explain that there can be no retaliation for making such reports in good faith and that all employees have the right to refuse to follow any direction related to PHAS REAC Inspections which they believe in good faith is a direction to commit an illegal act. The communications plan shall provide for regular meetings, email and other notifications with staff to reinforce these messages. NYCHA shall also post signage with this messaging. NYCHA shall begin implementing all elements of this communication plan by December 19, 2019.⁵

1. To create a culture of accountability and integrity in the PHAS REAC Inspection process the Chief Compliance Officer will:
 - Attend Property Management Department borough meetings to:
 - o Provide information about the Compliance Department and explain its role with respect to PHAS REAC Inspections;
 - o Reinforce the message that staff shall not use deceptive practices such as covering up or hiding conditions that need repair or making false reports in connection with either PHAS REAC Inspections or in the performance of any maintenance and repair work throughout the year; and
 - o Reinforce the message that a PHAS REAC Inspection should accurately reflect the development's year-round housing conditions and that developments should not undertake extraordinary "just in

⁵ See the High Level Milestones and Completion Dates section for the scheduled completion date of each action item.

time” repairs to meet minimal compliance thresholds at the time of the PHAS REAC Inspection.

- In coordination with the Chief Communications Officer, the Chief Compliance Officer and the Executive Vice President of Operations will publish quarterly newsletters on NYCHAConnect and/or send the same to all staff via email on topics including but not limited to the following:
 - A description of PHAS REAC Inspections and NYCHA’s role in the process;
 - Discussion of the potential implications of PHAS REAC Inspection scoring to NYCHA;
 - Examples of common deficiencies cited during PHAS REAC Inspections and how to address them year-round;
 - Examples of deceptive practices, reminders that they are prohibited and how to report them; and,
 - Consequences for committing deceptive practices.

2. Compliance Department

- The Compliance Department created a “Deceptive Practices Poster” (a sample poster is included in Appendix A) which was posted during the 2019 PHAS REAC Inspections and will continue to be posted at developments in employee common areas and skilled trades shops year-round to remind staff of the prohibitions on committing deceptive practices before and during PHAS REAC Inspections or when reporting about them. The poster provides a contact number and the website where employees can anonymously report any deceptive practices. Developments began displaying the poster on July 2, 2019.
- In July when PHAS REAC Inspections recommenced, began notifying Property Managers, Property Maintenance Supervisors, and Regional Asset Managers by email (and will continue to do so) upon receiving notice of the PHAS REAC Inspection of their obligations to:

- o Meet with staff and remind them that deceptive practices are prohibited, and occurrences must be reported;
- o Ensure that the Deceptive Practices Poster has been posted in employee common areas and skilled trades shops; and
- o Reinforce the message that a PHAS REAC Inspection should accurately reflect the development's year-round housing conditions and operations and that developments should not undertake extraordinary "just in time" repairs to meet minimal compliance thresholds at the time of the PHAS REAC Inspection.

The Compliance Department began sending out these notifications on July 1, 2019. Electronic copies of the notifications are now kept in a centralized database.

- Began promptly scheduling and holding documented telephone meetings upon receiving notice of a PHAS REAC Inspection, with the applicable Regional Asset Managers, Property Managers, and Property Maintenance Supervisors from all developments scheduled for a PHAS REAC Inspection to remind them of:
 - o The need to refrain from and prevent any deceptive practices in preparation for or during the PHAS REAC Inspections.
 - o The need to reinforce the message that a PHAS REAC Inspection should accurately reflect the development's year-round housing conditions and operations and that developments should not undertake extraordinary "just in time" repairs to meet minimal compliance thresholds at the time of the PHAS REAC Inspection.

The Compliance Department began holding these meetings on July 2, 2019. Electronic copies of the meeting attendance rosters including the talking points, along with questions asked and responses, are distributed to Operations, including Regional Asset Managers, and maintained in a centralized database.

- Will require that all Operations staff (approximately 8,600 employees) acknowledge receiving the updated *Standard Procedure 040:18:1, Repair Standards & PHAS REAC Inspections*, within four months after

publication by the Compliance Department and thereafter, whenever updates are made. Supervisors shall provide hard copies of the procedure to each member of their staff and review it with them. Property Managers must ensure that all property management staff have access to a computer in order to acknowledge receipt of the updated *Standard Procedure 040:18:1, Repair Standards & PHAS REAC Inspections*. The Compliance Department will:

- o Send a report to the Executive Vice-President of Operations of employees who have not completed their acknowledgements within the specified timeframe.
- o Provide a timeframe for the Executive Vice-President of Operations to ensure compliance and to respond in writing. Include a recommendation that all employees who do not respond to the Executive Vice-President's request to complete their acknowledgements receive an instructional memo directing them to comply by a given date or be subject to additional discipline.

Electronic copies of the report and recommendations will be maintained in a centralized database.

- Will enlist the Resident Engagement Department to develop a plan to provide information to residents with regard to identification and reporting of deceptive practices such as covering or hiding conditions. The plan will be submitted to the Monitor for review and approval by December 2, 2019.

3. Operations

- Property Managers and Property Maintenance Supervisors will create awareness and a culture of compliance by routinely discussing the following topics at muster and other centralized meetings:
 - o NYCHA's goal is to maintain and repair its premises so that they meet UPCS and industry repair standards year-round and not just when a PHAS REAC Inspection is announced;

- o A development's PHAS REAC Inspection score should reflect its year-round performance in meeting UPCS. Engaging in deceptive practices to increase a PHAS REAC Inspection score is prohibited and never acceptable;
- o Employees are encouraged to report deceptive practices in connection with a PHAS REAC Inspection and may do so anonymously without fear of retaliation; and
- o The industry repair standards addressed in HUD Inspector Notice No. 2016-03 and the requirements of *Standard Procedure 040:18:1, Repair Standards & PHAS REAC Inspections*.

These routine and regular discussions will enhance employees' understanding of their year-round maintenance and repair responsibilities and will reinforce the prohibition against committing deceptive practices in connection with PHAS REAC Inspections. This communication strategy will be further elaborated on in the revised procedure to be completed by December 19, 2019.

As part of the bi-annual evaluation, the Agreement Pillar Team will assess whether the training and communication actions in this Action Plan have been effective to create awareness and a culture of compliance where the above items are routinely discussed.

- On a quarterly basis, Property Management Department Directors will review PHAS REAC Inspection best practices at their regularly scheduled borough meetings with Property Managers and Property Maintenance Supervisors. A roster of all Property Managers and Property Maintenance Supervisors will be uploaded into the SharePoint application accessible through NYCHACConnect to verify attendance.
- Property Managers and Property Maintenance Supervisors will hold and document quarterly meetings with staff to discuss:
 - o The NYCHA mission and HUD requirement that NYCHA properties be decent, safe, sanitary and in good repair at all times;

- o The importance of year-round compliance with the UPCS and the industry repair standards addressed in HUD Inspector Notice No. 2016-03;
- o The importance of committing no deceptive practices, and how to report deceptive practices; the anti-retaliation policy and its provisions; and that all employees have the right to refuse to follow any direction related to PHAS REAC Inspections which they believe in good faith is a direction to commit an illegal act; and
- o The requirements of *Standard Procedure 040:18:1, Repair Standards & PHAS REAC Inspections*.

Meeting agendas and sign-in sheets shall be uploaded into the SharePoint application accessible through NYCHAConnect.

- Property Managers and Property Maintenance Supervisors will acknowledge holding the quarterly meetings on NYCHA's Acknowledgement Portal. The Property Management Department Director will send a report to the Executive Vice-President of Operations documenting those employees who have not completed their acknowledgements within the specified timeframe and the actions taken to address non-compliance.
- Property Managers and Property Maintenance Supervisors will hold centralized meetings with property management staff at least one week before PHAS REAC Inspections and will continue to do so to reinforce the prohibition against deceptive practices and how to report them should they occur. Meeting agendas and sign-in sheets must be uploaded into the SharePoint application accessible through NYCHAConnect.
- Property Managers and Property Maintenance Supervisors will ensure that the Deceptive Practices Poster is posted in staff common areas and skilled trades shops throughout the year.
- The Department of Management and Planning will make available REAC Inspection Guides to staff or offices in a pragmatic manner, as follows:

- Personnel in the following property management titles shall receive the REAC Inspection Pocket Guides for easy everyday reference:
 - Regional Asset Manager
 - Property Manager
 - Assistant Property Manager
 - Property Maintenance Supervisor
 - Assistant Property Maintenance Supervisor
 - Supervisor of Grounds
 - Supervisor of Caretakers
 - Maintenance Worker
 - Skilled Trade Worker
- Each property management office and Property Management Department borough office shall receive one copy of the more comprehensive REAC Inspection Field Guide.
- Property Management Departments will be responsible for distributing the guides and shall ensure that each employee signs for them upon receipt. Copies of the signed receipts will be maintained in a centralized database. The REAC Inspection Field Guides were distributed, commencing the week of August 19, 2019.
- Property management staff are expected to regularly review the REAC Inspection Pocket Guides and Field Guides and follow the guidance during all building, grounds, and apartment inspections. The use of the guides will reinforce the comprehensive PHAS/UPCS training and refresher training provided to staff.

Action 4 – Establish Forums for Filing Complaints

NYCHA, through its Compliance and IT Departments, has established forums for employees to effectively and anonymously report complaints regarding compliance issues and deceptive practices in connection with PHAS REAC Inspections in particular.

- Residents, employees, contractors, and the general public may now call and make compliance-related complaints to the Customer Contact

Center (CCC) at 718-707-7771. Any complaints related to deceptive practices and PHAS REAC Inspections are immediately transferred to and handled by designated Compliance Department staff. By July 1, 2019, Compliance Department personnel were onboarded and trained to receive complaints.

- The Compliance, IT and Communication Departments, working collaboratively, have established a webpage which is accessible through NYCHAConnect (employees) and the NYCHA portal on NYC.gov. The NYC.gov portal may be used by employees, residents, contactors, and the general public. The webpage provides an additional avenue to report complaints anonymously and confidentially regarding compliance matters, including deceptive practices in connection with PHAS REAC Inspections. The webpages on NYC.gov and NYCHAConnect were launched on April 15, 2019 and June 17, 2019, respectively. As of July 22, 2019, residents can also make complaints through the Submit Concern Tab on the MyNYCHA Self-Service Portal.
- As each situation requires, Compliance Department personnel will investigate reported instances of suspected deceptive or other improper practices related to PHAS REAC Inspections received through any of the stated channels.

Action 5 – Proactively Identify Deceptive Practices

NYCHA will proactively identify and prevent deceptive practices through (i) unannounced visits to developments to monitor compliance, (ii) random unscheduled quality assurance inspections, and (iii) through analyses of work and maintenance-related data such as Siebel service requests, Maximo work orders, QA Unit inspection findings, and other applicable and available data to determine whether deceptive practices may have occurred.

1. The Compliance Monitors in the Compliance Department's Monitoring Unit began conducting unscheduled on-site monitoring on July 9, 2019 at developments where PHAS REAC Inspections were scheduled, which will continue.

- Sampling Method
 - The goal for the initial six-month monitoring plan is to conduct on-site monitoring at 20% of developments notified of scheduled PHAS REAC Inspections.
 - The Compliance Department will evaluate its monitoring plan every six months in consultation with the Monitor and make adjustments as needed to the sample size and monitoring activities.
 - A cross section of developments will be selected for monitoring based on, but not limited to, the following criteria:
 - Location (Borough, Property Management Department).
 - Lack of response to requests for exigent health and safety work order documentation.
 - Property Management or other NYCHA department or personnel recommendation of an unscheduled monitoring.
- Compliance Monitoring activities include but are not limited to the following:
 - Attending muster to confirm that supervisors reinforce the prohibition on deceptive practices, how to report them if they occur and that there will be no retaliation against employees who make such reports.
 - Conducting surveys of Maintenance Workers, Caretakers, and supervisors concerning deceptive practices such as covering up or hiding conditions that need repair or making false reports in relation to PHAS REAC Inspections.
 - Confirming that the Deceptive Practices Posters are posted prominently in employee offices and common areas.
 - Confirming that developments have addressed exigent health and safety issues identified by HUD REAC inspectors.
- Reporting
 - The Compliance Department prepares monitoring reports that include recommendations that are shared, as applicable, with

Property Management Department Directors, Regional Asset Managers, Property Managers, and/or Property Maintenance Supervisors for follow up action and response to be completed within specified timeframes. If a response is not received as specified, the issue is escalated to the Vice-President for Public Housing Operations.

- Potential instances of deceptive practices are reviewed and investigated as described in Action 6.
 - Copies of the reports are maintained in a centralized database.
2. In collaboration with Operations, IT, EH&S, QA Unit, and other NYCHA Departments, the Compliance Department will analyze data and identify trends or indicators in Siebel service requests, Maximo work orders, QA Unit inspection findings, and other data that suggest the occurrence of deceptive practices in relation to PHAS REAC Inspections. This analysis will include but not be limited to:
- Data from Maximo work orders and Siebel service requests opened and closed following notification of a PHAS REAC Inspection compared with year-round work order and service request data; and
 - QA Unit composite data from quality assurance inspections of work performed in advance of PHAS REAC Inspections compared with data from other QA Unit inspections.
3. EH&S while performing oversight of matters related to, but not limited to, lead-based paint, mold, heating, pests, elevators, air quality, and other aspects of NYCHA's physical environment will:
- Advise the Compliance Department of any regulatory or other compliance issues observed;
 - Advise the Compliance Department of any instances of deceptive practices such as the covering up or hiding of conditions that need repair or the occurrence of any false reporting identified during EH&S oversight activities; and

- When requested by the Compliance Department, ensure that exigent health and safety hazards identified during a PHAS REAC Inspection have been eliminated.

4. The QA Unit will in relation to PHAS REAC Inspections:

- Conduct random, unscheduled quality assurance inspections of work performed in advance of PHAS REAC Inspections as well as year-round, to determine whether that work was performed according to industry standards; and
- Share information on findings related to the integrity of PHAS REAC Inspections with the Compliance Department and Operations.

In order to meet the requirements of the Agreement, the QA Unit is evaluating and updating the current quality assurance process described in *Standard Procedure 059:17:1, Public Housing Quality Assurance Program*. The QA Unit will submit a draft of the updated procedure to the Monitor for review and approval once the update is complete.

5. The Compliance Department will investigate potential instances of deceptive practices identified through these monitoring techniques, see Action 6. Any potential deceptive practices identified will be promptly reported to the Chair, the General Manager, and the Monitor.

6. Operations

- Operations, led by the Vice-President for Public Housing Operations, and IT will build out supervisory inspection work orders in Maximo by no later than March 30, 2020. Once built out, Regional Asset Managers, Skilled Trades Deputy Directors, Skilled Trades Administrators, and Skilled Trades Supervisors (individually and collectively, the “inspecting supervisor”) will use Maximo inspection work orders to conduct unannounced physical inspections at developments throughout the year to ensure they are maintained to UPCS and that repairs are performed to industry standards.

Title	Scope of Inspection	Minimum Frequency
Regional Asset Manager	Sample of Buildings and Grounds	One inspection per development per month ⁶
Skilled Trades Deputy Directors, Administrators, and Supervisors	Sample of closed work orders	4 work inspections per week (per person)

- o The inspecting supervisor will use a Maximo inspection work order to conduct the inspection and record inspection findings. Maximo will automatically generate child work orders for deficiencies identified.
- o The Property Manager and/or Property Maintenance Supervisor will confirm that all work is completed in a reasonable timeframe set forth in Appendix B, based on the number and level of deficiencies, and whether skilled trades staff and/or a vendor are/is required to correct the deficiency.
- o The inspecting supervisor will review the inspection child work orders in Maximo at least monthly to ensure that the deficiencies have been corrected and will address open work orders, as appropriate, with the Property Manager and/or Property Maintenance Supervisor.

Department Directors shall review the Maximo inspection reports monthly to confirm that the inspections are taking place as required and immediately address non-compliance. Instances of non-compliance must be documented and shall be shared with the Executive Vice-President for Public Housing Operations and the Compliance Department.

- Operations, led by the Vice-President for Public Housing Operations, and IT will build out monthly building and grounds inspection Maximo work orders for Property Managers and Property Maintenance Supervisors by no later than March 30, 2020. Property Managers and Property Maintenance Supervisors shall use these work orders to conduct their monthly building and grounds inspections to ensure that developments are maintained to UPCS and that timely repairs are performed to industry standards.

⁶ For each development under the RAM’s auspices, the RAM shall conduct one inspection per month at each development.

- The Property Manager and Property Maintenance Supervisor will use the monthly building and grounds inspection work orders to conduct the inspections and record findings. Maximo will automatically generate child work orders for deficiencies identified.
- The Property Manager and Property Maintenance Supervisor shall confirm that all work is completed in a reasonable timeframe set forth in Appendix B, based on the number and level of deficiencies, and if skilled trades staff and/or a vendor is required to correct the deficiency.

Regional Asset Managers and the Department Directors shall review the Maximo reports monthly to ensure that these inspections are taking place and immediately address non-compliance. Instances of non-compliance shall be documented and shared with the Executive Vice-President for Public Housing Operations and the Compliance Department.

- Property Managers, Property Maintenance Supervisors, and other development property management supervisors:
 - Periodically perform quality assurance inspections of closed work orders for work performed by employees.
 - Inspect all work performed by contractors and only certify the completion of work performed to industry standards.

Each identified manager or supervisor is responsible to assure that appropriate action is taken if work is not performed in compliance with UPCS or industry repair standards, including disciplinary action for employees.

The frequency of these inspections and the protocol for documenting findings and disciplinary actions will be outlined in the revised *Standard Procedure 040:18:1, Repair Standards & PHAS REAC Inspections* to be completed in 4th Quarter 2019.

- Following publication of the HUD PHAS REAC Inspection Report, the Property Manager and Property Maintenance Supervisor, with the

guidance of the Regional Asset Manager, shall create a corrective action plan to address the UPCS deficiencies identified in the report and to establish guiding principles for development staff to focus on in the coming year. The Property Manager and Property Maintenance Supervisor will use the corrective action plan as a tool to measure progress in meeting the UPCS. The Property Manager shall submit quarterly corrective action plan status reports to the Regional Asset Manager and the Property Management Department Director.

The Compliance Department will monitor Operations' compliance with the action items in this section of the Action Plan using data analysis to review work and identify anomalies for further inspection. In addition, the QA Unit will provide QA results of work orders created based on Operations supervisory inspections in its scope. The Compliance Department will investigate potential instances of deceptive practices including false reporting identified through these monitoring techniques, see Action 6.

Action 6 – Investigate Deceptive Practices

On June 24, 2019, NYCHA's Compliance Department onboarded staff to investigate complaints received through the forums, and other potential instances of deceptive practices identified through compliance monitoring, quality assurance inspections, and/or data analysis.⁷

- Complaints or monitoring findings related to PHAS REAC Inspections will be reviewed by the Chief Compliance Officer or Deputy Director of the Compliance Department. The Chief Compliance Officer will assess whether the complaint or monitoring findings of alleged activities is a deceptive practice such as covering up or hiding conditions in advance of or during PHAS REAC Inspections, performing substandard repairs in preparation for a PHAS REAC Inspection or otherwise, performing non-emergency work in common areas after an inspection begins, performing work in selected or alternate units after such units have been identified for a PHAS REAC Inspection absent an emergency health and safety issue, falsifying any documentation or falsely reporting any

⁷ Nothing in this section is intended to preclude Operations staff or other NYCHA staff, at all levels, from identifying, investigating and stopping possible deceptive practices activities at any developments or elsewhere.

incident, issuing or following improper orders to engage in any of these activities by supervisors at any level. In evaluating these complaints or monitoring findings, the Chief Compliance Officer or Deputy Director will seek to identify and collect credible evidence concerning the same.

- If based on the conclusions reached after an investigation or monitoring, the Compliance Department determines that a deceptive practice or other improper practice has occurred, the Compliance Department will:
 - Issue a recommendation to the appropriate Department Director or higher for immediate remediation if the practice or action could cause an injury, illness, or fatality;
 - Refer any activity or practice identified as criminal or criminal-related misconduct to the Office of the Inspector General and so inform the Monitor. In the interim, the Compliance Department will take such actions as the Inspector General and the Chief Compliance Officer deem appropriate;
 - Report the findings and recommendations to the Chair, General Manager, Executive Vice-President of Operations, the applicable Vice-President of Operations, and the Monitor;
 - Meet with the Executive Vice-President of Operations, Vice-President of Operations, Department Director, Regional Asset Manager, Property Manager, and Property Maintenance Supervisor, as applicable, to review and discuss the investigation's findings and provide guidance so that Operations can develop a corrective action plan which may include staff disciplinary measures (in which case Human Resources shall also be notified), to address the Compliance Department's findings;
 - Approve the interim, if applicable, and final corrective action plan, which is shared with the Monitor; and
 - Monitor the implementation of the corrective action plan within the timeframes approved by the Chief Compliance Officer or Compliance Department Deputy Director until the corrective action plan is fully implemented.
- On at least a quarterly basis the Compliance Department will report complaints of deceptive practices, findings of investigations of any kind

and information regarding the resolution and discipline determined by Operations to the Chair, General Manager and HUD, SDNY, and the Monitor.

Action 7 – Enhance Maximo to Ensure That Only Emergency Work is Performed During PHAS REAC Inspections

Operations and IT, with the support from the Office of the Director of Operations in the General Manager's Office, will update Maximo's system logic to apply to work orders at developments scheduled for PHAS REAC Inspections. The goal of this initiative is to include a system flag indicating a PHAS REAC Inspection and a warning or restriction to staff concerning the performance of work other than to address emergency health and safety issues.

These system controls will enhance the existing process by restricting work performed during PHAS REAC Inspections to emergency work currently defined by Maximo as Priority Level 7, 8, or 9. NYCHA will complete its review of the Maximo Priority Codes and explore system logic by January 31, 2020, and prepare and implement updates to Maximo and provide training to staff by no later than March 31, 2020.

Maximo currently has 9 Priority Level codes. Property management staff respond to Maximo work orders based on the work order's Priority Level code. NYCHA considers work orders with Priority Level codes of 7, 8, or 9 to be emergency repairs to which a response is required, or a correction completed within 24 hours or less (Appendix B).

1. Operations

- Led by the Executive Vice-President of Operations, NYCHA will analyze current Maximo failure classes and problem codes and their Priority Levels.
- Operations, after consulting with the IT Department, the Performance Tracking and Analytics Department, the Law Department, and other NYCHA stakeholders including HUD and SDNY, will make recommendations for restructuring the emergency Priority Level codes

while ensuring that the changes do not result in a reduced level of priority code service to residents. The recommendations will include process changes and/or system controls needed to ensure that only emergency work is performed in common areas and in selected or alternate units during PHAS REAC Inspections.

- The proposed changes will be presented to NYCHA leadership for review.
- After the Executive Vice-President of Operations receives final approval for the restructured emergency Priority Level codes and restrictions on work order scheduling during PHAS REAC Inspections, from HUD, SDNY and the Monitor, Operations shall coordinate with IT to program the updates.
- Operations will prepare guidance and provide training for staff on the changes to the emergency Priority Level codes and restrictions on work order scheduling during PHAS REAC Inspections. This guidance will include information on which Priority Level codes relate to emergency health and safety work that can be performed in common areas once a PHAS REAC Inspection starts, and in selected or alternate units after such units have been identified for a PHAS Inspection.

2. The Compliance and Operations Departments

- To increase transparency and detect any potential deficiencies in relation to a PHAS REAC Inspection, the Compliance Department in collaboration with Operations will create a report of closed Maximo work orders and/or observations made or data collected through other monitoring activities or compliance investigations, if any. The report will identify any known work at a development which is the subject of a PHAS REAC inspection, including any non-emergency work completed at that development:
 - On the day the PHAS REAC Inspection commences through the time that such inspection of the site, building systems, building exterior, and common areas is completed; or

- Whether work has been conducted in any units selected (or alternate units after such units have been identified) until the completion of the PHAS REAC Inspection.

High Level Milestones and Completion Dates⁸

Milestone	Completion Date	Owner
Action 1 – Update Standard Procedure	12/19/19	Chief Compliance Officer
<ul style="list-style-type: none"> Publish SP 040:18:1, Repair Standards & PHAS REAC Inspections 	12/19/19	Chief Compliance Officer
Action 2 – Train NYCHA Staff	10/1/20	Chief Compliance Officer; Executive Vice-President and Chief Administrative Officer
<ul style="list-style-type: none"> Release RFP for PHASE 1 PHAS/UPCS, industry repair standards, and deceptive practices training 	5/14/19	Chief Compliance Officer
<ul style="list-style-type: none"> Award contract for PHASE 1 Training 	6/30/19	Chief Compliance Officer
<ul style="list-style-type: none"> Begin PHASE 1 Training 	10/1/19	Chief Compliance Officer
<ul style="list-style-type: none"> Begin deployment of PHASE 2 PHAS/UPCS training to approximately 3,000 other employees, primarily caretakers 	9/1/20	Chief Compliance Officer
<ul style="list-style-type: none"> Provide PHASE 1 Training to 1,700 employees 	9/30/20	Chief Compliance Officer
<ul style="list-style-type: none"> Begin deployment of PHASE 3 ongoing new employee training on PHAS/UPCS, industry repair standards, and deceptive practices 	10/1/20	Chief Compliance Officer; Executive Vice-President and Chief Administrative Officer
<ul style="list-style-type: none"> Begin deployment of ongoing annual online refresher training 	10/1/20	Executive Vice-President and Chief Administrative Officer

⁸ See Appendix C for the PHAS Action Plan Timeline

<p>Action 3 – Communications Plan</p>	<p>12/2/19</p>	<p>Chief Compliance Officer; Executive Vice-President of Operations; Executive Vice-President for Community Engagement & Partnerships</p>
<ul style="list-style-type: none"> • Create Deceptive Practices Poster for immediate posting at developments 	<p>7/1/19</p>	<p>Chief Compliance Officer</p>
<ul style="list-style-type: none"> • Compliance Department begins sending email notifications to Property Managers, Property Maintenance Supervisors, and Regional Asset Managers upon notification of PHAS REAC Inspections from HUD 	<p>7/1/19</p>	<p>Chief Compliance Officer</p>
<ul style="list-style-type: none"> • Property Managers and Property Maintenance Supervisors begin holding centralized meetings on deceptive practices at least one week before PHAS REAC Inspections 	<p>7/1/19</p>	<p>Executive Vice-President of Operations</p>
<ul style="list-style-type: none"> • Property Managers and Property Maintenance Supervisors begin posting the Deceptive Practices Poster in employee common areas and skilled trade shops 	<p>7/2/19</p>	<p>Executive Vice-President of Operations</p>
<ul style="list-style-type: none"> • Compliance Department begins holding telephone meetings with property management upon notification from HUD of PHAS REAC Inspections 	<p>7/2/19</p>	<p>Chief Compliance Officer</p>
<ul style="list-style-type: none"> • Chief Compliance Officer begins attending Property Management Department borough meetings to speak on deceptive practices 	<p>9/30/19</p>	<p>Chief Compliance Officer</p>
<ul style="list-style-type: none"> • Distribute REAC Inspection Guides to staff and offices 	<p>9/30/19</p>	<p>Executive Vice-President of Operations</p>
<ul style="list-style-type: none"> • Create Acknowledgement Portal request for Property Managers and Property Maintenance Supervisors to acknowledge holding quarterly meetings on UPCS, industry repair standards, and SP 040:18:1 	<p>9/30/19</p>	<p>Executive Vice-President of Operations</p>

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<ul style="list-style-type: none"> Chief Compliance Officer and Executive Vice-President of Operations begin publishing quarterly newsletters for all employees 	10/1/19	Chief Compliance Officer; Executive Vice-President of Operations
<ul style="list-style-type: none"> Develop resident information plan for submission to Monitor for review and approval 	12/2/19	Executive Vice-President for Community Engagement & Partnerships
<ul style="list-style-type: none"> Create Acknowledgement Portal request for Operations staff to acknowledge receipt of the updated SP 040:18:1 and for supervisors to hold related meetings 	12/19/19	Chief Compliance Officer
Action 4 – Establish Forums for Filing Complaints	7/1/19	Chief Compliance Officer
<ul style="list-style-type: none"> Launched webpage 	6/17/19	Chief Compliance Officer
<ul style="list-style-type: none"> Launched forum where employees, contractors, and residents can call and make complaints to the Customer Contact Center 	7/1/19	Chief Compliance Officer
<ul style="list-style-type: none"> Trained designated Compliance Department staff on how to document complaints of deceptive practices 	7/1/19	Chief Compliance Officer
Action 5 – Proactively Identify Deceptive Practices	3/30/20	Chief Compliance Officer; Quality Assurance Officer; Executive Vice-President of Operations
<ul style="list-style-type: none"> Begin on-site compliance monitoring related to PHAS REAC Inspections 	7/9/19	Chief Compliance Officer
<ul style="list-style-type: none"> Begin QA Unit inspections of work performed in advance of PHAS REAC Inspections 	9/16/19	Quality Assurance Officer
<ul style="list-style-type: none"> Begin identifying trends or indicators in Siebel, Maximo, QA Unit and other data that suggest deceptive practices 	11/3/19	Chief Compliance Officer
<ul style="list-style-type: none"> Operations begins using Maximo to record deficiencies in 1) unscheduled work inspections by inspecting supervisors and 2) monthly Property Manager and Property Maintenance Supervisor building and grounds inspections 	3/30/20	Executive Vice-President of Operations

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Action 6 – Investigate Deceptive Practices	6/24/19	Chief Compliance Officer
<ul style="list-style-type: none"> Onboarded staff to investigate instances of suspected deceptive practices, report findings, and recommend corrective action, training and/or progressive discipline 	6/24/19	Chief Compliance Officer
Action 7 – Enhance Maximo to Ensure That Only Emergency Work is Performed During PHAS REAC Inspections	3/31/20	Executive Vice-President of Operations
<ul style="list-style-type: none"> Conduct analysis of current Maximo emergency Priority Level codes and explore system logic 	1/31/20	Executive Vice-President of Operations
<ul style="list-style-type: none"> Prepare business requirements for Priority Level code changes and work with IT to implement them; and train staff on the updates 	3/31/20	Executive Vice-President of Operations

Metrics⁹

Metric	Baseline (Dec 2018)	2019	2020	2021	Total
Personnel Acknowledging Receipt/Review of SP 040:18:1	0		8,611		8,611
Personnel Receiving PHAS/UPCS Contracted Phase 1 and Phase 2 Training	0	500	1950	2250	4700
# of Borough Meetings Attended by CCO	0	2	8	8	18
# Developments Participating in Pre-PHAS Inspection Compliance Telephone Meetings	0	60 ¹⁰	120	120	300
# of Pre-PHAS Development Meetings	0	60	120	120	300

⁹ Except for the Acknowledgement of the SP and contracted training, all other activities listed are ongoing beyond 2021.

¹⁰ The projected number of PHAS REAC Inspections per year is 120.

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# of Quarterly Borough Meetings to Discuss PHAS Best Practices	0	12	24	24	60
# of Quarterly Meetings at Developments to Review PHAS, UPCS, etc.	0	149 ¹¹	596	596	1341
% of pre-PHAS related Work Orders Inspected by QA Unit beginning 9/16/19 ¹²		100%	100%	100%	100%
% of Operations Supervisory Work Orders Inspected by QA Unit beginning 3/30/20 ¹³			50%	50%	50%
% of PHAS Inspection Scores Below 60 ¹⁴	28%				

Projected Contract Needs & Capacity of Existing Contracts

Compliance Department has contracted with a vendor to provide the PHASE 1 PHAS/UPCS training to 1,700 Operations and other personnel. In addition, a vendor is also required to conduct the Phase 2 training of an additional 3,000 personnel, primarily caretakers, and the PHASE 3 ongoing PHAS/UPCS training of new employees.

Budget Needs

Estimated cost for the PHASE 1, 3-day training for 1700 employees is \$657,900. This need is currently funded in 2019 into 2020.

Estimated cost for purchasing REAC Inspection Guides is \$20,000. This need was funded in 2019.

Unfunded Needs

The estimated cost for the 2-day PHASE 2 training for 3,000 additional staff and development of the annual online refresher training is \$1.2 million. The estimated annual cost for the PHASE 3 new employee training is \$200,000, which may change based on the number of new hires.

The Compliance Department and Operations will each hire a PHAS Action Plan Project Manager at an estimated salary of \$134,000 including fringe benefits.

Concerns/Impediments

Need to establish and onboard appropriate levels of staff.

¹¹ The number of NYCHA developments (149) is subject to change due to operational enhancements such as the conversion of public housing units to project-based Section 8 units through the Rental Assistance Demonstration program.
¹² The QA Unit will target 100% of work orders identified as preparation for PHAS to inspect.
¹³ The QA Unit will target a minimum of 50% of work orders created as a result of Operations' unscheduled supervisory inspections.
¹⁴NYCHA will report this metric on an annual basis.

Appendix A



COMPLIANCE DEPARTMENT

HUD INSPECTIONS AND DECEPTIVE PRACTICES

It is NEVER ACCEPTABLE to use deceptive practices when performing work or to interfere with a U.S. Department of Housing & Urban Development (HUD) inspection in any way.

Examples of deceptive practices include:

- Covering up or hiding conditions that need repair, such as concealing leaks by turning off the water, covering holes in walls with cardboard or wood, or directing staff to engage in such conduct
- False statements or deliberate omission of information in reporting
- Performing substandard repairs that do not meet industry standards
- Performing work in common areas after a HUD inspection begins, other than for emergency health and safety issues
- Performing work in units identified for HUD inspection, other than for emergency health and safety issues

MAINTENANCE AND REPAIRS MUST BE DONE YEAR-ROUND USING INDUSTRY STANDARDS.

If you see anyone engaging in a deceptive practice or interfering with a HUD inspection, call the Customer Contact Center at 718-707-7771 or visit the Compliance Department webpage on NYCHACConnect.

Complaints can also be reported to any other federal, state, or local government.

You can report confidentially and anonymously.

**NYCHA'S GOAL IS TO BE INSPECTION-READY EVERY DAY OF THE
YEAR!**

Appendix B

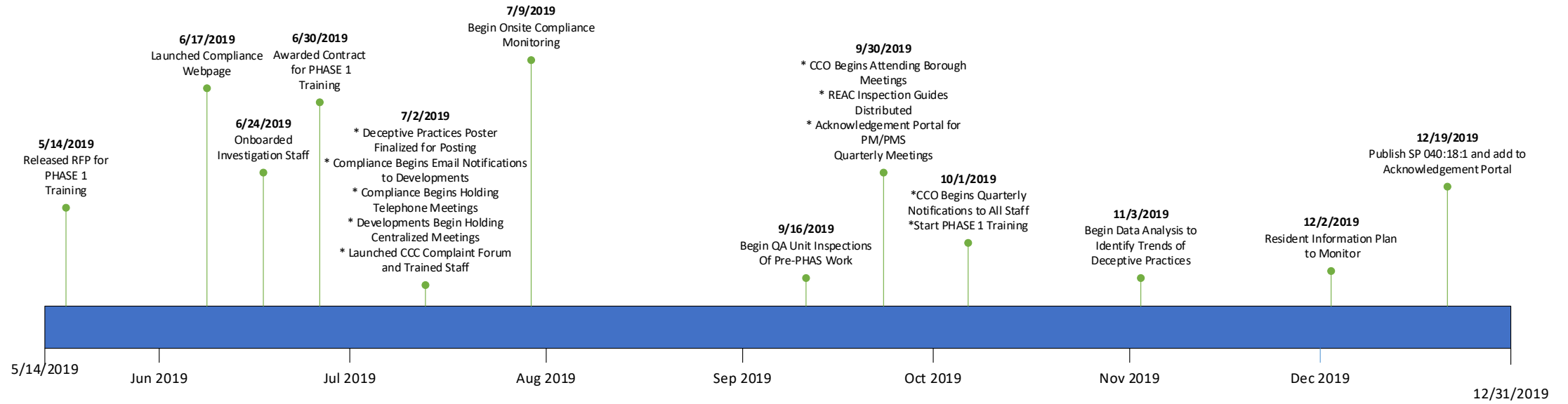
SIEBEL AND MAXIMO PRIORITY LEVELS

Siebel Service Priority Levels	Maximo Priority Levels	Response Times	Customer Messages
First Level	9	Respond within 1 hour	Respond within 1 hour
Second Level	8	Correct within 10 hours	Next available team
Third Level	7	Correct within 24 hours	Respond within 24 hours
Fourth Level	5	Correct within 48 hours	Respond within 48 hours
Fifth Level	4	Correct within 10 days	None
Sixth Level	3	As scheduled	As scheduled
Seventh Level	1	Waiting on resources or approval	Not applicable

Source: Standard Procedure 040:09:6, Customer Contact Center. Note: Maximo Priority Level Code 6 is designated for follow up work.

Appendix C

2019 PHAS Inspection Action Plan Timeline



2020 PHAS Inspection Action Plan Timeline

