

The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

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NO. 2006-0665-3A

ON THE PHYSICAL CONDITION
OF STATE-AIDED PUBLIC HOUSING UNITS
AND RESOURCES ALLOCATED FOR THE
OPERATION AND UPKEEP
OF THE
GLOUCESTER HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005

OFFICIAL AUDIT REPORT APRIL 17, 2007

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INTRODUCTION

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Gloucester Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A. Our on-site visits were conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties were maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for the intended purpose. In addition, we reviewed the adequacy of the level of funding provided to each LHA for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

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1. RESULTS OF INSPECTIONS - NONCOMPLIANCE WITH STATE SANITARY CODE

DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. Between November 28, 2005 and November 30, 2005, we inspected 15 of the 537 state-aided housing units managed by the Authority and noted 68 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on walls/ceilings, mold, mildew, leaking brickwork and windows, roofs that need to be replaced, and other health and safety hazards. In response to our audit, the Authority indicated that certain instances of noncompliance are in the process of being resolved, and that they will apply for funds to address the additional issues noted from our inspections.

2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority's average

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turnaround time for vacant units was 38 days. Moreover, we found that there were over 900 applicants on the Authority's waiting list. In response to our audit, the Authority indicated that the hiring of three additional maintenance mechanics will improve unit turnaround time.

3. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING UNITS

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During our audit, we found that the Authority had approximately 32,000 square feet of land located at 252-256 Main Street on which it had planned to construct a 667-7 elderly housing development. However, the site of the project is located on a cliff resulting in it being suspended due to the cost of building and low potential rental income. The Authority, in concert with DHCD, should seek an alternative site for the construction of family and elderly housing units to accommodate the family and elderly applicants on its waiting list. In response to our audit, the Authority indicated that it will request DHCD's assistance in finding an appropriate development plan for this site.

4. STATUS OF OPERATING SUBSIDIES EARNED, RECEIVED, AND OUTSTANDING

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The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority to meet its expenses. A review of the Authority's operating subsidy accounts indicated that it was owed \$188,419, whereas a list of subsidies that was provided to us by DHCD indicated that it owed the Authority \$169,288. In response to our audit, the Authority indicated that a subsidy was received during fiscal year 2006 that covered the remaining fiscal year subsidies due the Authority for fiscal years 2004 and 2005.

5. VACANT MAINTENANCE POSITIONS RESULTING IN PREVENTIVE MAINTENANCE NOT BEING PERFORMED

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The Authority indicated that it lost three maintenance positions due to a lack of state funding. While these positions have remained unfilled, the Authority's vacant unit turnover and work order completion time has increased by 20%, and the Authority has been forced to postpone much of its scheduled preventive maintenance. In response to our audit, the Authority indicated that the hiring of three additional maintenance mechanics will improve the Authority's vacant unit turnover and work completion time.

6. MODERNIZATION INITIATIVES NOT FUNDED

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In response to our questionnaires, the Authority indicated that it has requested funding from DHCD for eight different capital modernization projects for its 200-1, 667-1, 667-2, 667-4, 667-5, 667-6, and 705-1 developments, which have not been funded by DHCD. Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, if the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants will be seriously compromised. In response to our audit, the Authority indicated that it will request full funding to address its modernization needs.

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INTRODUCTION

Background

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Gloucester Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A.

Our on-site visits were conducted to follow up on survey data we obtained in order to: observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties were maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for the intended purpose. In addition, we reviewed the adequacy of the level of funding provided to each LHA for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as the capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

Audit Scope, Objectives, and Methodology

The scope of our audit included an evaluation of management controls over dwelling unit inspections, modernization funds, and maintenance plans. Our review of management controls included those of both the LHAs and DHCD. Our audit scope included an evaluation of the physical condition of the properties managed; the effect, if any, that a lack of reserves, operating and modernization funds, and maintenance and repair plans has on the physical condition of the LHAs'

state-aided housing units/projects, and the resulting effect on the LHAs' waiting lists, operating subsidies, and vacant units.

Our audit was conducted in accordance with applicable generally accepted government auditing standards for performance audits and, accordingly, included such audits tests and procedures as we considered necessary.

Our primary objective was to determine whether housing units were maintained in proper condition and in accordance with public health and safety standards (e.g., the State Sanitary Code, state and local building codes, fire codes, and Board of Health regulations) and whether adequate controls were in place and in effect over site-inspection procedures and records. Our objective was to determine whether the inspections conducted were complete, accurate, up-to-date, and in compliance with applicable laws, rules, and regulations. Further, we sought to determine whether management and DHCD were conducting follow-up actions based on the results of site inspections.

Second, we sought to determine whether individual LHAs were owed prior-year operating subsidies from DHCD, and whether the untimely receipt of operating subsidies from DHCD may have resulted in housing units not being maintained in proper condition.

Third, in instances where the physical interior/exterior of LHA-managed properties were found to be in a state of disrepair or deteriorating condition, we sought to determine whether an insufficient allocation of operating or modernization funds from DHCD contributed to the present conditions noted and the resulting effect, if any, on the LHAs' waiting lists and vacant unit reoccupancy.

To conduct our audit, we first reviewed DHCD's policies and procedures to modernize state-aided LHAs, DHCD subsidy formulas, DHCD inspection standards and guidelines, and LHA responsibilities regarding vacant units.

Second, we sent questionnaires to each LHA in the Commonwealth requesting information on the:

- Physical condition of its managed units/projects
- State program units in management
- Off line units
- Waiting lists of applicants

• Listing of modernization projects that have been formally requested from DHCD within the last five years, for which funding was denied

- Amount of funds disbursed, if any, to house tenants in hotels/motels
- Availability of land to build affordable units
- Written plans in place to maintain, repair, and upgrade its existing units
- Frequency of conducting inspections of its units/projects
- Balances, if any, of subsidies owed to the LHA by DHCD
- Condition Assessment Reports (CARS) submitted to DHCD
- LHA concerns, if any, pertaining to DHCD's current modernization process

The information provided by the LHAs was reviewed and evaluated to assist in the selection of LHAs to be visited as part of our statewide review.

Third, we reviewed the report entitled "Protecting the Commonwealth's Investment – Securing the Future of State-Aided Public Housing." The report, funded through the Harvard Housing Innovations Program by the Office of Government, Community and Public Affairs, in partnership with the Citizens Housing and Planning Association, assessed the Commonwealth's portfolio of public housing, documented the state's inventory capital needs, proposed strategies to aid in its preservation, and made recommendations regarding the level of funding and the administrative and statutory changes necessary to preserve state public housing.

Fourth, we attended the Joint Legislative Committee on Housing's public hearings on March 7, 2005 and February 27, 2006 on the "State of State Public Housing;" interviewed officials from the LHA, the Massachusetts Chapter of the National Association of Housing and Redevelopment Officials, and DHCD; and reviewed various local media coverage regarding the condition of certain local public housing stock.

To determine whether state-aided programs were maintained in proper condition and safety standards, we (a) observed the physical condition of housing units/projects by conducting inspections of selected units/projects to ensure that the units and buildings met the necessary minimum standards set forth in the State Sanitary Code, (b) obtained and reviewed the LHA's policies and procedures relative to unit site inspections, and (c) made inquiries with the local boards

of health to determine whether any citations had been issued, and if so, the LHA's plans to address the cited deficiencies.

To determine whether the modernization funds received by the LHAs were being expended for the intended purposes and in compliance with laws, rules, and regulations, we obtained and reviewed the Quarterly Consolidated Capital Improvement Cost Reports, Contracts for Financial Assistance, and budget and construction contracts. In addition, we conducted inspections of the modernization work performed at each LHA to determine compliance with its work plan.

To determine whether LHAs were receiving operating subsidies in a timely manner, we analyzed each LHA subsidy account for operating subsidies earned and received and the period of time that the payments covered. In addition, we made inquiries with the LHA's Executive Director/fee accountant, as necessary. We compared the subsidy balance due the LHA per DHCD records to the subsidy data recorded by the LHA.

To assess controls over waiting lists, we determined the number of applicants on the waiting list for each state program and reviewed the waiting list for compliance with DHCD regulations.

To assess whether each LHA was adhering to DHCD procedures for preparing and filling vacant units in a timely manner, we performed selected tests to determine whether the LHA had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHA to renovate the units.

AUDIT RESULTS

1. RESULTS OF INSPECTIONS - NONCOMPLIANCE WITH STATE SANITARY CODE

The Department of Housing and Community Development's (DHCD) Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to the minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code.

For the fiscal year ended June 30, 2005, we reviewed 12 of the 537 state-aided dwelling unit inspection reports managed by the Gloucester Housing Authority. In addition, from November 28, 2005 through November 30, 2005, we conducted inspections of 15 units located at the Authority's Riverdale Park, which is part of the Family 200-1 Development, including 1, 3, 5, 14, and 16 Patriots Circle, as well as 66 and 70 Veteran's Way, and McPherson Park Apartments, which is part of the Elderly 667-4 Development, including units 312, 318, 412, 414, 608, 610, 612, and 614. Our inspection noted 68 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on walls/ceilings, mold, mildew, leaking brickwork and windows, failing roofs, and other health and safety hazards. We also noted that five units at the Authority's McPherson Park Apartments were taken off line by the Authority due to water penetration. (Appendix I of our report summarizes the specific State Sanitary Code violations noted, and Appendix II includes photographs documenting the conditions found).

The photographs presented in Appendix II illustrate the pressing need to address the conditions noted, since postponing the necessary improvements would require greater costs at a future date, and may result in the properties not conforming to minimum standards for safe, decent, and sanitary housing.

Recommendation

The Authority should apply for funding from DHCD to address the issues noted during our inspections of the interior (dwelling units) and exterior (buildings) of the Authority, as well as other issues that need to be addressed. Moreover, DHCD should obtain and provide sufficient funds to the Authority in a timely manner so that it may provide safe, decent, and sanitary housing for its tenants.

Auditee's Response

In response to this issue, the Authority stated, in part:

The Gloucester Housing Authority will apply to DHCD for funds to repair roofs at Patriot Circle/Veterans Way, improve lighting on the stairs, improve site grading and repair sidewalks, upgrade the electrical service and repair structures where necessary.

In regards to the instances of noncompliance, the Authority stated that:

- 18 [of the instances consist of] 4 offline units that were inspected (9 of these items will be resolved with the completion of a window replacement project now in progress at McPherson Park, 667-4; the other 9 will be corrected during unit occupancy when the window project is complete);
- 10 [of the instances consist of] occupied units at 667-4 that will be resolved with the new windows
- 10 [instances of noncompliance] will be corrected through our work order system
- 24 items require additional funding from DHCD to make systemic repairs throughout the Patriot Circle/Veterans Way neighborhood.

2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 38 days (28 days to ready an apartment and 10 days to house a tenant). Moreover, we found that there were over 900 applicants on the housing authority waiting list.

By not ensuring that vacant units are reoccupied within DHCD's guidelines, the Authority may have lost the opportunity to earn potential rental income net of maintenance and repair costs and may have lost the opportunity, at least temporarily, to provide needy citizens with subsidized housing. The Authority indicated that three maintenance positions were unfilled due to a lack of state funding (see Audit Result No. 5). If these positions were filled, unit turnaround time could be reduced and preventive maintenance and repairs could be expedited.

Recommendation

The Authority should secure the necessary funding to fill its maintenance positions and ensure that its vacant units are refurbished and reoccupied within the timeframe established by DHCD.

Auditee's Response

In response to this issue, the Authority stated, in part:

The hiring of three additional maintenance mechanics would improve our unit turnaround time and increase our ability to respond to tenant-generated maintenance calls and also perform preventive maintenance. We will seek a budget exemption in our 2007 Operating Budget to allow hiring three additional Maintenance Mechanics.

3. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING UNITS

During our audit, we found that the Authority had approximately 32,000 square feet of land available at 252-256 Main Street, which was prepared for a proposed 667-7 elderly housing development. However, this project was suspended after DHCD withdrew funding due to local building restrictions, high cost, low potential rental income, and because there is a steep drop off which encompasses two-thirds of the lot that cannot be built on.

Recommendation

The Authority, in concert with DHCD, should seek alternative sites for the construction of family and elderly housing units, since it has over 900 family and elderly housing applicants on its waiting list.

Auditee's Response

In response to this issue, the Authority stated, in part:

The Gloucester Housing Authority remains interested in developing housing on the Main Street site. We will request DHCD for their assistance in finding an appropriate development plan for this site.

4. STATUS OF OPERATING SUBSIDIES EARNED, RECEIVED, AND OUTSTANDING

The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority to meet its expenses. During our audit, we requested and received from DHCD a statement of operating subsidy balances due and outstanding for each local housing authority (LHA) of the Commonwealth as of June 30, 2005. During our field visits to the LHAs, we reviewed the subsidy records to determine whether the amounts were in agreement with the balances provided by DHCD. As of June 30, 2005 the Authority's subsidy records indicated that operating subsidies earned and due the Authority amounted to \$188,419, consisting of the following:

Balance Due for the Fiscal Year Ended June 30, 2004	\$ 54,808
Subsidy for Fiscal Year Ended June 30, 2005	<u>133,611</u>
	\$188,419

However, a list of balances due the LHAs provided to us by DHCD indicated that it owed the Authority a balance of \$169,288. Because of the discrepancy between the balances provided by the Authority and DHCD, it is not apparent whose records are correct.

Recommendation

The Authority should communicate with DHCD to determine whether the correct amount of operating subsidy due the Authority is recorded in its financial statements. Secondly, DHCD should work with each LHA to resolve any variances by obtaining quarterly financial statements from each LHA so that it can monitor and reconcile operating subsidies due to and due from each LHA. Third, in order for the Authority to receive the subsidies it is entitled to on a timely and accurate basis, it is necessary that all variances are reconciled and that DHCD provides the requisite adequate contribution.

Auditee's Response

In response to this issue, the Authority stated, in part:

In fiscal year end June 30, 2006 DHCD provided the GHA with subsidy that exceeded the amount owed for the 2006 fiscal year. The excess payment was enough to cover the balance of \$188,419.00 due for the 2004 and 2005 fiscal years.

5. VACANT MAINTENANCE POSITIONS RESULTING IN PREVENTIVE MAINTENANCE NOT BEING PERFORMED

The Authority indicated that it lost three maintenance positions due to a lack of state funding. While these positions have remained unfilled, the Authority's vacant unit turnover and work order completion time have increased by 20%, and the Authority has been forced to postpone much of its scheduled preventive maintenance. The Executive Director noted in his September 26, 2005 report to the Joint Committee on Housing and Urban Development that the net effect of the level of state funding since fiscal year 2001 has resulted in a sharply decreased level of services to elderly and family residences, and that an increase in annual state funding of \$90,000 was needed to restore the lost positions. If these positions were filled, unit turnaround time could be reduced and preventive maintenance and repairs of units could be expedited.

Recommendation

The Authority should continue to appeal to DHCD to provide the necessary funding to fill its maintenance positions and ensure that vacant units are refurbished and reoccupied within the timeframe established by DHCD.

Auditee's Response

In response to this issue, the Authority stated, in part:

The hiring of three additional maintenance mechanics would improve our unit turnaround time and increase our ability to respond to tenant-generated maintenance calls and also perform preventive maintenance. We will seek a budget revision to supplement our 2007 Operating Budget to include three additional maintenance mechanics.

6. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. Specifically, the Authority indicated that it has requested from DHCD funding for the following eight capital modernization projects for its 200-1, 667-1, 667-2, 667-4, 667-5, 667-6, and 705-1 developments:

Date of Request	<u>Description</u>	Estimated Cost
September 2001	Roof Replacement, 667-1, Lincoln Park	\$80,000
September 2001	Roof Replacement, 200-1,. Riverdale Park	\$280,000
September 2001	Roof Replacement, 705-1, Arthur Street	\$30,000
September 2001	Kitchen/Baths, 200-1, Riverdale Park	\$280,000
September 2001	Interrupter Outlets for Kitchen/Baths, 667-2, Poplar Park	\$425,000
December 12, 2003	Elevator Controls, 667-5, Sheedy Park	\$125,000
December 12, 2003	Elevator Controls, 667-6, Clark Building	\$20,000
June 17, 2004	New Windows, 667-4, McPherson Park	\$200,000

None of these requests have been funded by DHCD.

Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. If the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur and the Authority's ability to provide safe, decent, and sanitary

housing for its elderly and family tenants could be seriously compromised. Lastly, deferring the present modernization needs into future years will cost the Commonwealth's taxpayers additional money due to inflation, higher wages, and other related costs.

In June 2000, Harvard University awarded a grant to a partnership of the Boston and Cambridge Housing Authorities to undertake a study of state-aided family and elderly/disabled housing. The purpose of the study was to document the state's inventory capital needs and to make recommendations regarding the level of funding and the administrative and statutory changes necessary to give LHAs the tools to preserve and improve this important resource. The report, "Protecting the Commonwealth's Investment - Securing the Future of State Aided Public Housing," dated April 4, 2001, stated that "Preservation of existing housing is the fiscally prudent course of action at a time when Massachusetts faces an increased demand for affordable housing. While preservation will require additional funding, loss and replacement of the units would be much more expensive in both fiscal and human terms."

Recommendation

The Authority should continue to appeal to DHCD to provide the necessary modernization funds to address these issues in a timely manner.

Auditee's Response

In response to this issue, the Authority stated, in part:

We will request full funding to allow us to replace all the roofs at Lincoln Park, 667-1, at Riverdale Park, 200-1 and at Arthur Street, 705-1. We will also ask that the kitchen/bath study for Riverdale Park be funded. We will request funds to allow the installation of interrupter outlets at Poplar Park, 667-2. We will seek funding for new elevator controls at the Sheedy Building, 667-5 and the Clark Building, 667-6.

SUPPLEMENTARY INFORMATION

Gloucester Housing Authority-Managed State Properties

The Authority's state-aided housing developments, the number of units, and the year each development was built is as follows:

<u>Development</u>	Number of Units	Year Built
200-1	160	1949
667-1	52	1958
667-2	76	1963
667-4	97	1974
667-5	81	1980
667-6	56	1983
705-1	<u>15</u>	1983
Total	<u>537</u>	

APPENDIX I

State Sanitary Code Noncompliance Noted

<u>Location</u>	<u>Noncompliance</u>	Regulation
200-1 Family Development		
1 Patriots Circle	Kitchen doors were in disrepair	105 CMR 410.500
	Kitchen and living room floors were in disrepair	105 CMR 410.500
	Peeling paint on walls in living room, kitchen, bathroom, and bedrooms 1 & 2 Living room, kitchen, bathroom, bedroom #1, and bedroom #2	105 CMR 410.500
	ceilings have loose plaster, peeling paint, and dampness	105 CMR 410.500
	Roof needs to be replaced	105 CMR 410.500
	Porches/stairs/rails are not properly lighted	105 CMR 410.253
	Porches/stairs/rails are in disrepair	105 CMR 410.503
	Yard/parking area in disrepair	105 CMR 410.750
	Sidewalks are in disrepair	105 CMR 410.750
	Cellar walls, ceiling, and window frame are damaged	105 CMR 410.500
	Clutter around heating system	105 CMR 410.750
3 Patriots Circle	Roof is not in good repair	105 CMR 410.500
	Porches/stairs/rails are not properly lighted	105 CMR 410.253
	Porches/stairs/rails are in disrepair	105 CMR 410.503
	Yard/parking area in disrepair	105 CMR 410.750
	Sidewalks in disrepair	105 CMR 410.750
5 Patriots Circle	Roof in disrepair	105 CMR 410.500
	Porches/stairs/rails are not properly lighted	105 CMR 410.253
	Porches/stairs/rails are in disrepair	105 CMR 410.503
	Yard/parking area in disrepair	105 CMR 410.750
	Sidewalks present a trip hazard	105 CMR 410.750
14 Patriots Circle	Kitchen outlets are below code	105 CMR 410.251
	Bathroom ceiling has loose plaster, peeling paint, and dampnes	s 105 CMR 410.500
	Roof is in disrepair	105 CMR 410.500
16 Patriots Circle	Bathroom window frame is damaged	105 CMR 410.500
	Temporary wiring on stairs	105 CMR 410.256
66 Veterans Way	Front doors need repair in living room	105 CMR 410.500
	Living room floors were in disrepair	105 CMR 410.500
	Trip hazards in living room due to temporary wiring	105 CMR 410.256
	Water damage to walls in living room	105 CMR 410.500
	Toilet/bathtub/shower in need of repair	105 CMR 410.150
	Cellar has rotted beam	105 CMR 410.500
70 Veterans Way	Unit passageway obstructed by furniture near bedroom #1	105 CMR 410.451

	Roof in need of repair	105 CMR 410.500
	Temporary wiring on bedroom/living room floor	105 CMR 410.256
667-4 Elderly Development		
McPherson Park # 614	Walls were in disrepair in living room/kitchen/bedroom	105 CMR 410.500
	Windows were leaking rain water in living room/bedroom	105 CMR 410.501
	Deteriorating shingles	105 CMR 410.500
McPherson Park # 318	Walls were in disrepair	105 CMR 410.500
	Windows were leaking rain water	105 CMR 410.501
McPherson Park # 412	Walls were in disrepair	105 CMR 410.500
	Windows were leaking rain water	105 CMR 410.501
McPherson Park # 608	Walls were in disrepair	105 CMR 410.500
	Windows were leaking rain water	105 CMR 410.501
	Ceilings have loose plaster, peeling paint, and dampness	105 CMR 410.500
	Roof was in disrepair	105 CMR 410.500
McPherson Park, #312	Walls were in disrepair in kitchen/bathroom/living	105 CMR 410.500
Offline (vacant)	room/bedroom	
	Exposed wiring in unit and outside circuit box	105 CMR 410.351
	In living room/bedroom	105 CMR 410.500
	Ceilings have loose plaster, peeling paint, dampness in kitchen/bathroom/living room/bedroom	103 CIVIN 410.300
	Stove was in disrepair in the kitchen	105 CMR 410.100
	Refrigerator was inoperable in the kitchen	105 CMR 410.100
McPherson Park, #414	Floors were in disrepair in kitchen/bathroom/	105 CMR 410.500
Offline (vacant)	living room/bedroom	
	Trip hazards on floors in kitchen/bathroom/bedroom/	105 CMR 410.504
	living room	405 CMD 440 500
	Walls were in disrepair in kitchen Wires hanging from ceiling	105 CMR 410.500 105 CMR 410.256
	Exposed wiring in unit and outside circuit box	105 CMR 410.250
	Ceilings have loose plaster, peeling paint, dampness	105 CMR 410.500
	in kitchen/bathroom/bedroom/living room	
	Stove was in disrepair in the kitchen	105 CMR 410.100
	Refrigerator was inoperable in the kitchen	105 CMR 410.100
	Cabinets were in disrepair in the kitchen	105 CMR 410.100
	Countertops were not fit for use in the kitchen	105 CMR 410.500
	Unit passageway was obstructed by furniture near kitchen/bedroom/living room	105 CMR 410.451
	Monorage and Control of the Control	
McPherson Park #610	Walls were in disrepair in the kitchen/bathroom/	105 CMR 410.500
Offline (vacant)	living room/bedroom	105 CMD 440 254
	Exposed wiring in unit and outside circuit box in living room/bedroom	105 CMR 410.351

	Ceilings have loose plaster, peeling paint, dampness in the kitchen/bathroom/living room/bedroom	105 CMR 410.500
	Stove was in disrepair in the kitchen Refrigerator was inoperable in the kitchen	105 CMR 410.100 105 CMR 410.100
McPherson Park #612	Walls were in disrepair in the kitchen/bathroom/	105 CMR 410.500
Offline (vacant)	living room/bedroom	

APPENDIX II

Photographs of Conditions Found

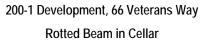
200-1 Development, 1 Patriots Circle

Damaged Walls, Ceiling, and Window Frame in Cellar



200-1 Development, 1 Patriots Circle Clutter Around Heating System in Cellar

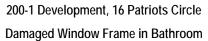






200-1 Development, 70 Veterans Way
Temporary Wiring on Bedroom and Living Room Floor







200-1 Development, 16 Patriots Circle Temporary Wiring on Stairs



667-4 Development, McPherson Park, #614

Deteriorating Shingles

