

# The Commonwealth of Massachusetts

# **AUDITOR OF THE COMMONWEALTH**

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#### NO. 2006-0678-3A

INDEPENDENT STATE AUDITOR'S REPORT
ON THE PHYSICAL CONDITION
OF STATE-AIDED PUBLIC HOUSING UNITS
AND RESOURCES ALLOCATED FOR THE
OPERATION AND UPKEEP OF THE
HOLYOKE HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005

OFFICIAL AUDIT REPORT JUNE 13, 2007

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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 also obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Holyoke 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 authorities 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 Authority-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 their 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. In its response, the Authority indicated that it agreed with the issues contained in our report.

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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.

We inspected 10 of the 289 state-aided housing units managed by the Authority and noted 79 instances of noncompliance with Chapter II of the State Sanitary Code, including cracked and peeling walls, loosely fitting window screens, cracks and tears in floors, damage from condensation, mold, mildew, disconnected smoke alarms, missing stairwell railings, and no light fixtures on stairwell ceilings.

#### 2. REQUIRED ANNUAL UNIT INSPECTIONS NOT DOCUMENTED

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 the minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. The Executive Director stated that

the Authority conducts inspections annually but only prepares inspection forms for the 200-1 development.

#### 3. MODERNIZATION INITIATIVES NOT FUNDED

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In response to our questionnaires, the Authority indicated that there is a need for modernizing its managed properties. In fiscal year 2002 the Authority submitted four Condition Assessment Reports for funding from DHCD for capital improvement; however, three of these requests for funding were denied. The Authority should re-apply to DHCD for funding so that it may address its capital improvement issues.

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, 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.

#### 4. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

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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 to June 30, 2005, the Authority's average turnaround time for vacant units was 42 days. Moreover, we found that as of June 30, 2005, there were over 50 applicants on the Authority's waiting list.

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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 Holyoke 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 their 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, 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 LHAs' 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 cited LHA's plan to address any reported 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 the 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 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 conducted inspections of 10 of 289 state-aided dwelling units, which were located at the Holyoke Housing Authority's Hamilton Street, South East Street, and South Summer Street (Family Housing 705), Beaudoin Village (Family Housing 200-1), Edwin Seibel Apartments (Elderly Housing 667-2), and Congregate Housing (Elderly Housing 667-3). Our inspection noted 79 instances of noncompliance with Chapter II of the State Sanitary Code, including no light fixtures on stairwill ceilings, cracked walls, paint peeling on walls, loosely fitting window screens, cracks and tears in floors, patched ceilings, condensation, mold, mildew, disconnected smoke alarms, unregistered cars parked in driveways, missing stairwell railings, exposed wires, drafty windows, and trip hazards. (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.

#### 2. REQUIRED ANNUAL UNIT INSPECTIONS NOT DOCUMENTED

The Department of Housing and Community Development's (DHCD) Property Maintenance Guide, Chapter 3(F), requires that inspections of housing units be conducted annually and upon each vacancy. The Authority's Executive Director informed us that although the Authority conducts inspections of all units annually, an inspection form is not prepared upon completion of the dwelling unit inspections, with the exception of the 200-1 program. Without proper documentation of dwelling unit inspections, the Authority cannot ensure that inspections were conducted properly or confirm 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.

#### Recommendation

The Authority should comply with DHCD's Property Maintenance Guide to ensure that inspection forms are properly prepared, dated, and signed after each dwelling unit has been inspected to provide written documentation of inspection and all instances of noncompliance noted.

#### 3. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority indicated that there is a need for modernizing its managed properties. At our request, the Executive Director prepared the following \$3,567,472 estimate of its modernization funding needs:

<u>Description</u>	Approximate Cost	<u>Total</u>
Lt. Beaudoin Village (217 units) Constructed 1951		
Sidewalk Replacement	\$236,250	
Site Improvements (alter/repair landscaping)	840,000	
Sewer & Drainage Replacement/Repairs (city)	750,000	\$1,826,250
Edwin Seibel Apartments (40 units)		
Constructed 1959		
Site Improvements (alter/repair landscaping)	\$70,297	
Exterior Site Lighting Upgrade	7,030	
Kitchen & Bathroom Modernization	750,000	
Flooring Replacement in Units	108,150	
Boiler Replacement/Upgrade	81,112	
New Roofing & Flashing	216,300	
	Lt. Beaudoin Village (217 units) Constructed 1951 Sidewalk Replacement Site Improvements (alter/repair landscaping) Sewer & Drainage Replacement/Repairs (city) Edwin Seibel Apartments (40 units) Constructed 1959 Site Improvements (alter/repair landscaping) Exterior Site Lighting Upgrade Kitchen & Bathroom Modernization Flooring Replacement in Units Boiler Replacement/Upgrade	Lt. Beaudoin Village (217 units) Constructed 1951  Sidewalk Replacement \$236,250  Site Improvements (alter/repair landscaping) 840,000  Sewer & Drainage Replacement/Repairs (city) 750,000  Edwin Seibel Apartments (40 units)  Constructed 1959  Site Improvements (alter/repair landscaping) \$70,297  Exterior Site Lighting Upgrade 7,030  Kitchen & Bathroom Modernization 750,000  Flooring Replacement in Units 108,150  Boiler Replacement/Upgrade 81,112

	Skylight Replacement	32,445	
	Miscellaneous Repairs to Exterior Siding	5,408	
	Unit Exterior Door Replacement	20,000	
	Elevator Lift & Community Room Improvements	80,000	\$1,370,742
667-3	Congregate Housing (20 units) Constructed =		
	Miscellaneous Interior & Exterior Repairs/Upgrades	\$156,800	
	Landscaping	6,720	<u>\$163,520</u>
705	Scattered Site Housing (12 units)		
	Constructed 1987		
	Misc. Interior & Exterior Repairs/Upgrades – Windows:		
	553 South Summer Street	\$10,000	
	524 South Summer Street	10,000	
	518 South Summer Street	10,000	
	555 South Summer Street	10,000	
	567 South Summer Street	10,000	
	567 South Summer Street	10,000	
	520 South Summer Street	10,000	
	522 South Summer Street	10,000	
	580 South East Street	10,000	
	582 South East Street	10,000	
	41-43 Hamilton Street	10,000	<u>\$110,000</u>
167-1*	Housing for People with Special Needs (8 units)		
	Constructed 1994		
	Replace HVAC System	\$60,000	
	Misc. Interior & Exterior Repairs/Upgrades	36,960	<u>\$96,960</u>
		Total Modernization Needs	<u>\$3,567,472</u>

<sup>\* 167-1</sup> is a state-aided development but is not managed by the Holyoke Housing Authority

The above conditions are mainly the result of aging, use, and wear and tear, and, as illustrated by photographs included in Appendix II, may pose a safety hazard to tenants.

Moreover, the Authority indicated that in fiscal year 2002 it submitted four Condition Assessment Reports (CARs) to DHCD for funding for its modernization needs. Of the four CARs submitted, only one was funded with a planning grant, while the remaining three were unfunded.

CAR No.	Building Condition Category and Brief Description of Condition	<u>Development</u> <u>No.</u>	<u>Status</u>
1	Other – water distribution replacement and upgrade	200-1	Planning Grant
2	Deteriorated site conditions – paving, walkways, landscaping	200-1	Not Funded
3	Deteriorated kitchens and baths	667-2	Not Funded
4	Deteriorated site conditions – paving, walkways, landscaping	667-2	Not Funded

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, 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. 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 Local Housing Authorities (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 remedy these issues in a timely manner.

## 4. 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 to June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 42 days. Moreover, we found that as of June 30, 2005, there were over 50 applicants on the Authority's 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.

#### Recommendation

The Authority should secure the necessary funding from DHCD to ensure that vacant units are refurbished and reoccupied within DHCD's suggested timeframe. DHCD should obtain and provide the Authority with the funds necessary to fulfill their statutory mandates.

#### Auditee's Response

In its response, the Authority indicated that it agreed with the issues disclosed in our report.

# SUPPLEMENTARY INFORMATION

# 1. Holyoke 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	217	1951
667-2	40	1959
667-3	20	1994
705-1	<u>12</u>	1987
Total	<u>289</u>	

# 2. Availability of Land to Build Affordable Housing Units

The Holyoke Housing Authority does not have any additional land available on which to build affordable units for state-aided housing.

# 3. Operating Subsidies Owed the Authority

As of June 30, 2005, Holyoke Housing Authority was not owed any operating subsidy funding from DHCD.

# **APPENDIX I**

# **State Sanitary Code Noncompliance Noted**

# **705 Family Development:**

<u>Location</u>	<u>Noncompliance</u>	<b>Regulation</b>
580 South East Street	Bathroom – condensation, mold, and mildew on vent	105 CMR 410.750
	Bathroom – light fixture cover missing	105 CMR 410.252
	Kitchen – cracks in floor	105 CMR 410.504
	Bedroom #2 -hole in wall	105 CMR 410.500
	Living/Dining Room –hole in window screen	105 CMR 410.551
	Kitchen – loose plaster, dampness on ceiling	105 CMR 410.500
	Bedroom #2 – broken window	105 CMR 410.501
	Bathroom – condensation, mold, and mildew	105 CMR 410.750
	Bathroom - paint peeling on ceiling	105 CMR 410.500
	Bathroom – peeling wood frame on window	105 CMR 410.500
	Common Area - 2 <sup>nd</sup> floor ceiling- cracked and buckling plaster around light fixture	105 CMR 410.500
	Kitchen – dented sink	105 CMR 410.100
	Kitchen – water damage on wall behind faucet	105 CMR 410.500
	Cellar – loose stairwell railing	105 CMR 410.503
567 South Summer Street	Bathroom – condensation, mold, and mildew	105 CMR 410.750
	Bedroom #1 – holes in wall	105 CMR 410.500

<u>Location</u>	<u>Noncompliance</u>	<b>Regulation</b>
	Bedroom #3 – chipped walls	105 CMR 410.500
	Common Area – paint cracking on closet door	105 CMR 410.500
	Bathroom – vent cover hanging and light fixture cover missing	105 CMR 410.252
	Living/Dining Room – loose window screens	105 CMR 410.551
	Kitchen – loose window screens	105 CMR 410.551
	Bathroom – loose window screens	105 CMR 410.551
	Bedroom #1 – loose window screens	105 CMR 410.551
	Bedroom #2 – loose window screens	105 CMR 410.551
	Bedroom #3 – loose window screens	105 CMR 410.551
	Common Area – loose window screens	105 CMR 410.551
	Kitchen – hole in ceiling	105 CMR 410.500
	Bathroom – condensation, mold and mildew on ceiling	105 CMR 410.750
	Bathroom – paint peeling	105 CMR 410.500
	Common Area – smoke alarm disconnected	105 CMR 410.482
	Common Area – light fixture cover missing	105 CMR 410.252
	Cellar – missing stairwell railing	105 CMR 410.503
	Outside – loose siding	105 CMR 410.500
43 Hamilton Street	Common Area – cracks, tears, and missing pieces in floors	105 CMR 410.504
	Kitchen – mold behind sink area	105 CMR 410.750

<u>Location</u>	<u>Noncompliance</u>	<b>Regulation</b>
	Common Area – electrical light fixture cover missing	105 CMR 410.253
	Bathroom – condensation, mold, and mildew on ceiling	105 CMR 410.750
	Common Area – patched ceiling	105 CMR 410.500
	Common Area – missing smoke alarm	105 CMR 410.482
	Siding/Paint – sideboard cracked, hole through siding, and unknown substance on back side of house	105 CMR 410.500
	Yard/Parking – backyard door screen broken and taped with black garbage bag	105 CMR 410.552
	Driveway—pavement buckling	105 CMR 410.750
	Cellar – stairwell has clutter on steps (trip hazard)	105 CMR 410.602
	Cellar – holes in wall	105 CMR 410.500
667-3 Elderly Development		
43 Lower Westfield Road [Unit 2M – Vacant] 2nd Floor	Living/Bedroom – rugs are buckling	105 CMR 410.500
[0.11.2.1.   0.00.1.] 2   1.00.1	Living/Bedroom - rug strip lifting up	105 CMR 410.504
	Living/Bed – hole in window screen	105 CMR 410.551
	Living/Bed – drafty windows	105 CMR 410.501
House [1st Floor]	Living Area –Heating and Ventilation System needs louver	105 CMR 410.500
	Living Area – plastic on windows due to draft	105 CMR 410.501
	Sidewalks – uneven surfaces	105 CMR 410.750

# **200-1 Family Development**

<u>Location</u>	<u>Noncompliance</u>	<b>Regulation</b>
44 Leary Drive	Kitchen – plaster buckling on wall near door frames	105 CMR 410.500
	Bedroom #2 – hairline cracks due to door frame being removed	105 CMR 410.500
	Bathroom – light fixture broken	105 CMR 410.252
	Common Area – light fixture missing	105 CMR 410.253
	Living/Dining Room – front window screen has holes	105 CMR 410.551
	Kitchen – window screens have holes	105 CMR 420.551
	Bedroom #2 – missing window screens	105 CMR 410.551
	Bedroom #2 – baseboard paint peeling	105 CMR 410.500
	Cellar – hose disconnected on dryer vent	105 CMR 410.352
	Cellar – clutter and flammable items stored in cellar	105 CMR 410.602
	Cellar – storing in certain areas not allowed	105 CMR 410.602
667-2 Elderly Development		
Buildings	Roof – problems with skylights leaking (not weather-tight)	105 CMR 410.501
	Siding - missing piece of fascia at peak of roof	105 CMR 410.500
	Siding – visible hole	105 CMR 410.500
	Sidewalks – uneven surfaces	105 CMR 410.750
	Common Area – exterior security door is weathered (paint peeling)	105 CMR 410.500
125B-1 Nonotuck Street	Bathroom – wall behind tile is deteriorating	105 CMR 410.500

<b>Location</b>	<u>Noncompliance</u>	<b>Regulation</b>
	Living/Dining Room – cracks on ceiling	105 CMR 410.500
	Common Area - window outside unit has broken seal, causing condensation	105 CMR 410.501
125D-3 Nonotuck Street	Bathroom – wall behind tile is deteriorating	105 CMR 410.500
125C-3 Nonotuck Street	Bathroom – wall behind tile is deteriorating	105 CMR 410.500
	Bathroom – paint peeling on ceiling, water stains	105 CMR 410.500
	Common Area - no light fixture on stairwell ceiling	105 CMR 410.254
	Common Area – plaster on wall crumbling around door frame in hallway	105 CMR 410.500
123B-1 Nonotuck Street	Bathroom – wall behind tile is deteriorating due to water damage	105 CMR 410.500
	Bathroom – ceiling paint starting to bubble due to water damage behind tile	105 CMR 410.500
	Kitchen – stove burners corroded with accumulation of grease	105 CMR 410.100
121C-1 Nonotuck Street	Bathroom – wall behind tile is deteriorating due to water damage	105 CMR 410.500

# **APPENDIX II**

# **Photographs of Conditions Found**



667-2 Development, Edwin Seibel Apartments
Bathroom – Wall Behind Tile Is Deteriorating

200-1 Development, Beaudoin Village Bedroom – Baseboard Paint Peeling



667-2 Development, Edwin Seibel Apartments
Piece of Fascia Missing



667-2 Development, Edwin Seibel Apartments Common Area – Plaster Crumbling Around Doorframe



705 Development, Scattered Sites Mold and Mildew on Bathroom Ceiling



705 Development, Scattered Sites Common Area - Missing Smoke Detector and Light Fixture Cover and Patched Ceiling due to Water Damage



705 Development, Scattered Sites Cracks, Tears, and Missing Pieces in Floors in



705 Development, Scattered Sites 43 Hamilton Street Storm Door Broken and Covered With a Trash Bag



705 Development, Scattered Sites Loose Siding on Building



705 Development, Scattered Sites Common Area – Patched Ceiling due to Water Damage



705 Development, Scattered Sites
Dented Sink and Water Damage on Wall Behind
Faucet in Kitchen



705 Development, Scattered Sites
Bathroom Light Fixture Cover Missing and Mold on
Ceiling



705 Development, Scattered Sites Bathroom - Mold and Mildew on Exhaust Fan



705 Development, Scattered Sites Common Area - Smoke Alarm Disconnected and Light Fixture Cover Missing



705 Development, Scattered Sites
Bathroom – Vent Cover Hanging and Light Fixture
Cover Missing



Page: 7 [JTH1] According to Supplementary Information Section, unit constructed in 1994?