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**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
MELROSE HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005**

**OFFICIAL AUDIT
REPORT
NOVEMBER 8, 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 obtained data from surveys and site visits to a selected, representative cross-section of 66 Local Housing Authorities (LHAs) throughout the state. The Melrose 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 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

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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 January 31, 2006 and February 2, 2006, we inspected 16 of the 322 state-aided housing units managed by the Authority and noted 57 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on walls/ceilings, trip hazards, exposed wiring, rotting porches, mold, unsafe handrails, and missing/non-functioning smoke detectors.

2. 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 through June 30, 2005, the Authority's average turnaround time for vacant units was 131 days. Moreover, we found that there were over 300 applicants on the Authority's waiting list.

3. MODERNIZATION INITIATIVES NOT FUNDED **8**

In response to our questionnaires, the Authority informed us that in 1999, 2001, and 2003 it requested modernization funding from DHCD for capital modernization projects in its 667-2 Elderly and 689 Handicapped developments. However, these requests were not 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.

4. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED **10**

Our audit disclosed that the Authority did not incorporate DHCD's Property Maintenance Guide into its policies and procedures. Specifically, we noted that the Authority did not have an official written preventive maintenance plan to inspect, maintain, repair, and upgrade its existing housing units. Such a plan would establish procedures to ensure that the Authority-managed properties are in decent, safe, and sanitary condition as defined by Chapter II of the State Sanitary Code.

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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 Melrose 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 LHAs 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 the 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 housing authorities 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 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 LHAs, 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 the 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 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 LHAs.

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 LHAs had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHAs 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 period July 1, 2003 to June 30, 2005, we reviewed inspection reports for 16 of the 322 state-aided dwelling units managed by the Melrose Housing Authority. In addition, between January 31, 2006 and February 2, 2006, we conducted inspections of these units located at the Authority's Steele Building, 1 Nason Drive (Elderly Housing 667-1); McCarthy Building, 910 Main Street (Elderly Housing 667-2); and 76 Beech Street, 487 and 489 Lebanon Street, 969 Main Street, 2 Trenton Street, and 319 Washington Street (Family Housing 705-C). Our inspection noted 57 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on walls/ceilings, trip hazards, exposed wiring, rotting porches, mold, unsafe handrails, and missing/non-functioning smoke detectors. (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's Executive Director stated, in part:

The conditions as reported were accurate. Contractors or our in-house staff has corrected many of the violations. We have two new Directors of Maintenance. Routine inspections are performed on each unit annually. Work orders are initiated from the inspections and weekly maintenance meetings are held to discuss open work orders and budgeting of time and money. We have implemented many new maintenance reforms, which I will enclose with my letter, which is the beginning of a written property maintenance plan. It remains a work in progress.

The Authority also provided the following comments on its managed properties.

667-2 Elderly

McCarthy Building Common Areas: All items repaired except cement walkways and parking areas.

Broken ceiling tiles replaced.

Windows remain old and drafty.

Apartment #106 repaired. It took maintenance 6 work orders, however it was finally repaired for the final time on 1/17/2006. (002163, 002264, 002393, 002553, 002677, 004431)

667-1 Elderly

All common areas in the Julian Steele building remain in disrepair except for the 9th floor ceiling and roof leak. The community room ceiling was budgeted for 2007. The outside leak to the community roof ceiling is currently being repaired by our Director of Maintenance and an outside contractor will be contracted to remove the ceiling paint, which contains asbestos. Once the paint is removed we will either paint in-house or contract out.

The Middlesex Sheriffs Community Work Program has painted the stair railings. However the tiles and lights under the bridge are not repaired. Many of the tiles have asbestos in them. This building has asbestos throughout all ceilings. When they become cracked or chipped it is necessary to hire an outside company to perform asbestos removal. We have requested funding and assistance from DHCD and been denied assistance in the asbestos removal of the ceilings. [DHCD] instructed us to budget each year a portion of ceilings to be abated. Again this cost comes directly from our Operating Reserve, which is far below the allowable minimum.

705 Family Units

319 Washington Street/2 Trenton Street remain a problem. The roof is in need of repair/replacement and is exceeding its life expectancy. The porches are in disrepair and are dangerous, as you can see in your picture. We are requesting an emergency grant from D.H.C.D. to complete this capital need.

76 Beech Avenue has been renovated by using an estimated \$100,000.00 of the MHA operating reserve. This was an MCAD claim against the MHA and was mediated by renovating the unit and allowing the tenant to be relocated during the renovation. This was a very large 2-bedroom unit and we ran into contracting problems. This cost directly hit the MHA Operating Reserves very hard. We are now well below minimum reserves.

487-489 Lebanon Street is being repaired by in-house maintenance.

969 Main Street is in desperate need of windows, as reported in your report. All emergency items repaired.

689 Handicapped Group Home

499 Lebanon Street – Project #178034 Emergency Request

We have received a project number for this home, however it has been over 18 months and this group home is in need of a comprehensive modernization (electrical, bathroom, heating and exterior foundation work, painting etc.) No one from DHCD has been to view the group home since we received the project award on May 9, 2007.

The MHA has addressed all health & safety items listed in your report for 2006. It has taken a longer time to complete them than I would have liked, but staffing has been a problem, which has been rectified. Please note that our new maintenance men are implementing new procedures for our maintenance. The administrative staff and the maintenance staff meet weekly to improve on scheduling, purchasing, and contracting of maintenance and vacancies (see new forms). Since both Project Directors of Maintenance are newly hired, it is amazing that the majority of items identified in your report have been completed and that capital needs have been identified for all our properties.

Auditor's Response

We commend the actions taken by the Authority in response to our concerns regarding its managed properties. However, since any corrective measures taken by the Authority originated after the completion of our audit fieldwork, we cannot express an opinion on their adequacy and will review any and all corrective actions taken during our next scheduled audit.

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 131 days. Moreover, we found that there were over 300 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. The Executive Director noted that the average number of workdays required to renovate vacant apartments has been cut in half and that the Authority was contemplating additional clerical procedures to meet DHCD's guidelines.

Recommendation

The Authority should continue to reduce the workdays required to renovate vacant apartments and ensure that all vacant units are refurbished and reoccupied within the DHCD's timeframe. DHCD should obtain and provide the Authority with the funds necessary to fulfill their respective statutory mandate.

Auditee's Response

In response to this issue, the Authority's Executive Director stated, in part:

Vacant unit turn over has improved significantly. Only units of very poor condition or studio apartments remained a serious problem. We recently updated our waiting lists, which was causing an administrative delay in leasing applicants. It appeared that we had 300 applicants when in fact many had moved on, been housed, or were not interested in the unit being offered. We hope that the updated wait list will help to improve the unit turn around time to comply with the D.H.C.D. regulation of 21 days. We have recently experienced a flood in 2007 and those units remain off-line at this time. There remains room for improvement in this area. However, I am confident we can turn this problem around.

3. 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 had applied for funding from DHCD for the following capital modernization projects:

<u>Date of Request</u>	<u>Description</u>	<u>Estimated Cost</u>
1999	Window replacement, McCarthy Building	\$500,000
2001	Water main replacement, McCarthy Building	\$34,000
2003	Window replacement, Trenton Street	\$15,000
2003	Kitchen/Bath	\$45,000

The above conditions are mainly the result of aging, use, and wear and tear. The Authority stated that these requests were denied 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 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 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 inventory of capital needs and to make recommendations regarding the level of funding and the administrative and statutory changes necessary to give local Massachusetts housing authorities 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, "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.

Auditee's Response

In response to this issue, the Authority's Executive Director stated, in part:

Modernization remains a serious problem. We have been fortunate to receive 5 emergencies awards from D.H.C.D. in the past year. We have not received any capital modernization funding for 667-2 windows which we initially requested funding for in 1999. We will again seek emergency funding for the windows (667-2 McCarthy Apartments) since this matter is now a high priority concerning energy consumption. We are budgeting emergency lighting in the hallways at the Steele House (667-1) for 2008, pending approval.

4. OFFICIAL WRITTEN PROPERTY MAINTENANCE PLAN NOT ESTABLISHED

During our audit, we found that the Authority did not incorporate DHCD's Property Maintenance Guide into its policies and procedures. Specifically, we noted that the Authority did not have an official written preventive maintenance plan to inspect, maintain, repair, and upgrade its existing housing units.

DHCD's Property Maintenance Guide states, in part:

The goal of good property maintenance at a public housing authority is to serve the residents by assuring that the homes in which they live are decent, safe and sanitary . . . every housing authority must have a preventive plan which deals with all the elements of its physical property and is strictly followed The basic foundation for your (LHA) maintenance program is your inspection effort the basic goals of an inspection program are to improve the effectiveness and efficiency of your maintenance effort. This will be achieved when you (LHA) have a thorough program of inspections when you observe all parts of the (LHAs) physical property, document the results of the inspections thoroughly, and convert the findings into work orders so that the work effort can be scheduled and organized. Inspections are the systematic observation of conditions and provide the foundation for capital improvements and long range planning, as well as a record of present maintenance needs.

A preventive maintenance program would also:

- Assist in capital improvement planning by assessing the current and future modernization needs of the Authority,
- Enable the Authority to establish procedures to assist its day-to-day operating activities to correct minor maintenance problems, and
- Schedule major repairs with the assistance of DHCD.

We recognize that a plan without adequate funds and resources is difficult, if not impossible, to implement. Nevertheless, without an official written preventive maintenance program in place, the Authority cannot ensure that its managed properties are in safe, decent, and sanitary condition in accordance with the State Sanitary Code.

Recommendation

The Authority should comply with DHCD's Property Maintenance Guide by establishing an official written preventive maintenance plan, and DHCD in turn should obtain and provide the necessary funds and resources to ensure that the plan is enacted.

Auditee's Response

In its response, the Authority stated that it is preparing a written property maintenance plan.

SUPPLEMENTARY INFORMATION***Melrose 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>	<u>Number of Units</u>	<u>Year Built</u>
667-1	155	1971
667-2	150	1976
705-1	5	Various
705-2	4	Various
705-3	<u>8</u>	Various
Total	<u>322</u>	

APPENDIX I

State Sanitary Code Noncompliance Noted

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
<u>667-2 Elderly Development</u>		
<u>McCarthy Building</u>		
Common Areas	Intercom system fails, causing access problems for elderly tenants	105 CMR 410.480
	Community room kitchen walls have water damage	105 CMR 410.500
	Exposed wiring in trash room and elevators	105 CMR 410.351
	Missing switch plate in laundry	105 CMR 410.351
	Broken glass in community room greenhouse	105 CMR 410.500
	Water damage in community room ceiling	105 CMR 410.500
	Many trip hazards on cement walkways and parking area	105 CMR 410.750
Common Areas	Broken ceiling tiles	105 CMR 410.500
Apartment # 106	Trip hazard due to installed carpeting	104 CMR 410.504
	Windows old and drafty	105 CMR 410.501
	Poor drainage in bathroom sink and tub; grit from sewerage backflows	105 CMR 410.351
<u>667-1 Elderly Development</u>		
<u>Steele Building</u>		
Common Areas	9 th -floor ceiling has water damage, as does community room	105 CMR 410.500
	Roof leaks onto 9 th -floor ceiling	105 CMR 410.500
	Exterior concrete breaking away	105 CMR 410.500
	Many broken exterior lights	105 CMR 410.253
	Many trip hazards on walkways and parking area	105 CMR 410.750
Common Area	Paint peeling on stair railing	105 CMR 410.500
Apartment #910	Small water stains on kitchen ceiling	105 CMR 410.500

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
<u>Family 705-C</u>		
487 Lebanon Street	Hall and bathroom floors pose trip hazards	105 CMR 410.504
	Living room, hall, and bathroom walls are damaged	105 CMR 410.500
	Bathroom ceiling in very poor condition, mold and damaged sheetrock	105 CMR 410.750
	Broken toilet seat	105 CMR 410.150
	Exterior siding - paint is peeling	105 CMR 410.500
489 Lebanon Street	Living room wall is cracked	105 CMR 410.500
	Living room ceiling is damaged	105 CMR 410.500
	Exterior siding - paint is peeling	105 CMR 410.500
	Handrail is very loose	105 CMR 410.503
319 Washington Street	Windows are old and drafty, missing storm windows	105 CMR 410.501
	Living room and 2 nd bedroom have water stains on ceiling	105 CMR 410.500
	Kitchen has broken cabinets	105 CMR 410.100
	Many trip hazards on pavement	105 CMR 410.750
2 Trenton Street	Missing glass in both front and rear screen doors	105 CMR 410.480
	Missing switch plate in bedroom	105 CMR 410.351
	Drafty windows, storm windows missing	105 CMR 410.501
	Water stains on bedroom ceiling	105 CMR 410.500
	Missing hall smoke detector	105 CMR 410.482
	Porch is rotting	105 CMR 410.500
969 Main Street	Chipped floor in bathroom	105 CMR 410.504
	Peeling paint on bathroom walls	105 CMR 410.500
	Old windows allow draft in	105 CMR 410.501
	All ceilings are peeling and have water damage	105 CMR 410.500

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
76 Beech Street	Cabinets broken in kitchen	105 CMR 410.100
	Two smoke detectors not functioning	105 CMR 410.482
	Loose handrails	105 CMR 410.503
	Trip hazards on pavement	105 CMR 410.750
	Kitchen, living room, and bathroom floors are in poor condition	105 CMR 410.504
	Trip hazard in living room	105 CMR 410.504
	Kitchen, living room, and bathroom walls are in poor condition	105 CMR 410.500
	Windows are deteriorated and drafty	105 CMR410.501
	Kitchen, living room, and bathroom ceilings have water stains with peeling paint	105 CMR 410.500
	Bathroom sink is old and stained	105 CMR 410.500
	Cabinets in kitchen no longer provide a sealed surface	105 CMR 410.100
	Toilet does not have adequate water pressure to flush	105 CMR 410.350
	Broken smoke detector in rear hallway	105 CMR 410.482
	Smoke detector in rear hall does not work	105 CMR 410.482
	Insect infestation	105 CMR 410.550
	Common area stairwell has cracked ceiling	105 CMR 410.500

APPENDIX II

Photographs of Conditions Found

Family 705, 319 Washington Street

Cracks and Holes in Walkway Pavement Causing Trip Hazards



Family 705, 319 Washington Street
Living Room Has Water Stains on Ceiling



Family 705, 76 Beech Street
Water-Stained Ceiling, Peeling Wallpaper in Kitchen



Family 705, 489 Lebanon Street
Severely Deteriorated Railing



Family 705, 487 Lebanon Street
Peeling Paint and Mold on Ceiling in Bathroom



Elderly Development 667, McCarthy Building, Common Area, 7th Floor
Broken Ceiling Tiles



Family 705, 76 Beech Street
Common Area Stairwell Has Cracked Ceiling



Elderly Development 667, Steele Building
Common Areas, Exterior Concrete Breaking Away



Elderly 667, Steele Building
Common Areas, Paint Peeling on Stair Railing



Elderly 667, McCarthy Building
Common Areas, Broken Glass in Community Room Greenhouse



Family 705, 2 Trenton Street

Wood Porch Is Rotting

