

AUDITOR

The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

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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 NEW BEDFORD HOUSING AUTHORITY JULY 1, 2003 TO JUNE 30, 2005

> OFFICIAL AUDIT REPORT JANUARY 25, 2008

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

AUDIT RESULTS

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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 housing 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 March 7 and 9, 2006, we inspected 24 of the 904 state-aided housing units managed by the Authority and noted 135 instances of noncompliance with Chapter II of the State Sanitary Code, including malfunctioning smoke detectors, peeling and rotting porch posts, water leaks on ceilings, leaky window seals, and peeling lead paint.

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 revealed that during the period January 1, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 47 days. Moreover, we found 1

that there were over 30 vacant Family and Elderly housing units and over 800 applicants on the Authority's waiting list at that time.

3. STATUS OF OPERATING SUBSIDY 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. As of June 30, 2005, the Authority's subsidy records indicated that operating subsidies due the Authority from DHCD for calendar year 2004 amounted to \$1,059,940. However, DHCD's subsidy records indicated that the subsidy balance due the Authority amounted to \$568,941. Untimely payments may prevent the Authority from meeting its monthly obligations in a timely manner or may cause the Authority to borrow funds from other programs to pay current liabilities as they become due.

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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 New Bedford 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 are 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 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 LHAs' 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 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 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 24 of the 904 state-aided dwelling units managed by the New Bedford Housing Authority. In addition, from March 7 through 9, 2006, we conducted inspections of the units located at the following Developments: Westwood and Crestview (Elderly Housing 667-1), Parkdale (Family Housing 200-1), Blue Meadows (Family Housing 200-2), Nashmont (Family Housing 200-3), Demedeiros (Family Housing 705-1), Sawyer Park (Family Housing 705-2), and Richmond (Family Housing 705-8). Our inspection noted 135 instances of noncompliance with Chapter II of the State Sanitary Code, including cracks and water damage to walls and ceilings, rotted door frames, lifting and broken floor tiles, rusty water, broken kitchen cabinets and countertops, leaky window seals, peeling and rotting porch posts, missing window screens, malfunctioning smoke detectors, mildew, peeling and flaking lead paint, and mold. (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, and any 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. 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 revealed that during the period January 1, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 47 days. Moreover, we found that there were over 30 vacant Family and Elderly housing units and over 800 applicants on the Authority's waiting list at that time. 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 ensure that the vacant units are refurbished and reoccupied within DHCD's timeframe. DHCD should obtain and provide the Authority with the funds necessary to fulfill their respective statutory mandates.

3. STATUS OF OPERATING SUBSIDY 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 LHA of the Commonwealth as of June 30, 2005. During our field visits to the LHAs, we reviewed each LHA's subsidy records to determine whether the amounts were in agreement with the balances reported by DHCD. As of June 30, 2005, the Authority's subsidy records indicated that operating subsidies due the Authority from DHCD for calendar year 2004 amounted to \$1,059,940. However, DHCD's subsidy records indicated that the subsidy balance due the Authority amounted to \$568,941.

A review of the Authority's calendar year 2005 records revealed that its earned subsidy totaled \$988,950. As of December 31, 2005, the Authority had received \$333,366, leaving a balance due of \$655,584. Untimely payments may prevent the Authority from meeting its monthly obligations in a current manner or may cause the Authority to borrow funds from other programs to pay current liabilities as they become due.

Recommendation

The Authority should communicate with DHCD to determine the correct operating subsidy amount and ensure that this amount is properly recorded in both DHCD's and the Authority's 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, for the Authority to receive all subsidies to which it is entitled on a timely and accurate basis, it is necessary that all variances be reconciled and that DHCD provides the requisite, adequate contribution.

Auditee's Response

In its response, the Authority indicated it agreed with the issues disclosed in our report. In addition, the Authority stated that because of the lack of adequate and timely funding over a five year period, it decided to close two Chapter 667 developments built in 1956, and replace the deficient housing with new construction. The funding for this project has been approved by DHCD and is slated to begin in 2008.

SUPPLEMENTARY INFORMATION

New Bedford 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:

Development	Number of Units	Year Built
200-1	100	1951
200-2	150	1951
200-3	80	1951
667-1	75	1956
667-2	202	1976
667-3	112	1974
689-1	8	1989
689-2	8	1990
705-1	24	1974
705-2	38	1972
705-3	58	1974
705-4	9	1973
705-6	20	1975,1976
705-7	10	1984
705-8	_10	1988
Total	<u>904</u>	

APPENDIX I

State Sanitary Code Noncompliance Noted

667-1 Development

Location	<u>Noncompliance</u>	Regulation
145 Liberty Street	Kitchen - cracked floor tiles	105 CMR 410.504
	- cracks in ceiling	105 CMR 410.500
127 Liberty Street	Kitchen - water damage on ceiling	105 CMR 410.500
	Entry way – peeling and rotting door frame	105 CMR 410.500
	Building exterior – paint peeling from siding	105 CMR 410.500
322 Tremont Street	Entry way – peeling and rotting door frame	105 CMR 410.500
	Bathroom - paint on walls is chipping and cracking	105 CMR 410.500
	- Mold on ceiling	105 CMR 410.750
	Bedroom - paint on walls is chipping and cracking	105 CMR 410.500
	Unit - fuse box is rusting	105 CMR 410.351
705-8 Development		
Location	Noncompliance	Regulation
52 Richmond Street	Kitchen - cracked tiles on floor	105 CMR 410.504
	- counter tops are chipped	105 CMR 410.100
	Unit - torn carpet on stairwell landing, which is a trip hazard	105 CMR 410.750
	- missing window screens	105 CMR 410.551
	Bathroom - mold and mildew on	105 CMR 410.750

105 CMR 410.500

- water leaks on ceiling

walls

	Location	Noncompliance	Regulation
		Front entry way – stairs crumbling	105 CMR 410.500
200-3 Developmen	<u>t</u>		
510 Mt PI	easant Street	Bathroom - paint peeling on wall	105 CMR 410.500
		Unit - smoke detector is not working	105 CMR 410.482
536 Nash	Road	Living room – floor has cracked tiles	105 CMR 410.504
		- window seals not airtight	105 CMR 410.501
		Kitchen – floor has cracked tiles	105 CMR 410.504
		- cracks in walls	105 CMR 410.500
		Bedroom # 2 - mildew damage on walls	105 CMR 410.750
		Bedroom #4 - no window screens	105 CMR 410.551
		- ceilings in need of painting	105 CMR 410.500
538 Nash	Road	Kitchen - floor tiles are cracked	105 CMR 410.504
		- cracks in walls	105 CMR 410.500
		Living room - floor tiles are cracked	105 CMR 410.504
		Bedroom # 3 - cracks in walls	105 CMR 410.500
		-window seals not airtight	105 CMR 410.501
		Bathroom - mold and mildew on ceiling	105 CMR 410.750
92 Newco	omb Street	Living room - holes in wall	105 CMR 410.500
		Kitchen - ceiling is destroyed	105 CMR 410.500
		- cabinets in need of repair	105 CMR 410.100

705-1 Development

Location	Noncompliance	Regulation
39 Desautels	Unit - ceilings and walls in need of repainting	105 CMR 410.500
	Kitchen - cracked floor tiles	105 CMR 410.504
	Bedroom – light switch has a cracked faceplate	105 CMR 410.351
	- window seals not airtight	105 CMR 410.501
	Basement - stairs have no railing and storage shelves have been built along wall	105 CMR 410.503

667-1 Development

Location	Noncompliance	Regulation
592 Summer Street	Bathroom – cracking and lifting floor tiles	105 CMR 410.504
	- rusty water	105 CMR 410.180
	Entry way – peeling and rotting door frame	105 CMR 410.500
	Living room - windows are missing window screens	105 CMR 410.551
586 Coggeshall Street	Entry way – peeling and rotting door frame	105 CMR 410.500
	Unit - walls need to be repainted	105 CMR 410.500
	- cracks in ceiling	105 CMR 410.500
	Kitchen – cabinet's particle board is beginning to peel due to humidity	105 CMR 410.100
	Building exterior – peeling and rotting porch posts	105 CMR 410.500
570 Coggeshall Street	Building exterior – paint peeling from siding	105 CMR 410.500
	Building exterior – main door	105 CMR 410.500
566 Coggeshall Street	peeling and rotting; screen door frame is rotting and screen window missing	105 CMR 410.552

Location	Noncompliance	Regulation
95 Peckham Street	Entry way – peeling and rotting door frame	105 CMR 410.500
	Kitchen - cracked floor tiles	105 CMR 410.504
	Living room - cracked floor tiles	105 CMR 410.504
	- window glass is broken	105 CMR 410.501

705-2 Development

Location	Noncompliance	Regulation
353 Sawyer St. Apt.1	Entry way - Door frame is damaged around handle, appears to be pried open	105 CMR 410.480
	Kitchen - cracked floor tiles	105 CMR 410.504
	- cracks in wall	105 CMR 410.500
	 cabinets are torn away from wall 	105 CMR 410.100
	Bathroom - cracked floor tiles	105 CMR 410.504
	- cracks in wall	105 CMR 410.500
	 ceiling is peeling due to moisture 	105 CMR 410.500
	Bedroom - cracks in wall	105 CMR 410.500
	Unit - electrical cords lying under doorways	105 CMR 410.256
357 Sawyer St. Apt. 12	Entry way – tenant replaced door with a hollow door	105 CMR 410.505
	Bathroom – sub-floor is rotting	105 CMR 410.504
	- sink has dripping faucet	105 CMR 410.351
	Bedroom # 1 - dryer without ventilation	105 CMR 410.351
	Bedroom # 2 - cracked floor	105 CMR 410.504
	Kitchen - electrical outlet is missing faceplate	105 CMR 410.351
	 paint on ceiling is peeling 	105 CMR 410.500

Location	Noncompliance	Regulation
	Living room – paint on ceiling is peeling	105 CMR 410.500
	Unit - smoke detector is missing	105 CMR 410.482
361 Sawyer St. Apt. 14	Kitchen - cracked floor tiles	105 CMR 410.504
	Living room - cracked floor tiles	105 CMR 410.504
	Unit - cracks and chips on walls, particularly on the corners	105 CMR 410.500
	 water damage on ceilings by rear entry 	105 CMR 410.500
200-1 Development		
Location	Noncompliance	Regulation
149 Summit Street	Kitchen - missing and cracked floor tiles	105 CMR 410.504
	Kitchen – window seals not airtight	105 CMR 410.501
	- ceiling has water stains	105 CMR 410.500
	Living room - missing and cracked floor tiles	105 CMR 410.500
	- window seals not airtight	105 CMR 410.501
	- small cracks in walls	105 CMR 410.500
	- ceiling has water stains	105 CMR 410.500
	Bedroom - missing and cracked floor tiles	105 CMR 410.500
	- window seals not airtight	105 CMR 410.501
	Bathroom - faucet fails to regulate water temperature	105 CMR 410.190
161 Summit Street	Kitchen - cracked floor tiles	105 CMR 410.504
	 range and oven have an excessive accumulation of grease 	105 CMR 410.352
	Living room - cracked floor tiles	105 CMR 410.504
	Bedroom - cracked floor tiles	105 CMR 410.504

Location	Noncompliance	Regulation
	All bedrooms - Mold and mildew on walls	105 CMR 410.750
	- window seals not airtight	105 CMR 410.501
	Bathroom - mold and mildew on walls	105 CMR 410.750
	Unit - paint peeling on ceilings	105 CMR 410.500
115 Hathaway Road	Kitchen - cracks and paint peeling on walls	105 CMR 410.500
	-window seals not airtight	105 CMR 410.501
	Bedroom - walls have holes from tenant	105 CMR 410.505
	-window seals not airtight	105 CMR 410.501
	- paint peeling on ceiling	105 CMR 410.500
	Living room –window seals not airtight	105 CMR 410.501
	Hallway – paint peeling on ceiling	105 CMR 410.500
	Unit – wiring running along stairwell and upstairs hall	105 CMR 410.256

200-2 Development

Location	<u>Noncompliance</u>	Regulation
162 Rockdale Ave.	Bedrooms –window seals not airtight	105 CMR 410.501
	Bathroom – window seals not airtight	105 CMR 410.501
	Kitchen - water damage on ceiling below bathroom	105 CMR 410.500
	Unit - smoke detector is disconnected	105 CMR 410.482

Location	<u>Noncompliance</u>	Regulation
77 Bluefield Street	Entry way - peeling and rotting door frame	105 CMR 410.500
	Bedroom #1 - torn window screen	105 CMR 410.551
	Bedrooms - missing floor tiles	105 CMR 410.504
	- ceilings have peeling paint	105 CMR 410.500
	- mold and mildew around windows	105 CMR 410.750
	Kitchen - mold and mildew around windows	105 CMR 410.750
	Bathroom - mold and mildew around windows	105 CMR 410.750
	Living room – ceiling has peeling paint	105 CMR 410.500
27 Bluefield Street	Kitchen - missing floor tiles	105 CMR 410.504
	- window seals not airtight	105 CMR 410.501
	Bedroom # 1 - missing floor tiles	105 CMR 410.504
	Bathroom – window seals not airtight	105 CMR 410.501
	Living room –window seals not airtight	105 CMR 410.501
	Unit - electrical cord running along hallway and bedroom	105 CMR 410.256
705-7 Development		
Location	Noncompliance	Regulation
953 South Water Street	Basement - windows are missing	105 CMR 410.501

Location	Noncompliance	Regulation
South Water Street	Basement - windows are missing glass, temporarily boarded up	105 CMR 410.501
	Hallway - wall in need of repair	105 CMR 410.500

Location	Noncompliance	Regulation
	Unit – electrical wiring running along stairwell, landing, and upstairs hallway	105 CMR 410.256
	Bathroom – mold and mildew around windows	105 CMR 410.750
	Bedroom – mold and mildew around windows	105 CMR 410.750
	Kitchen - cabinets are missing drawers	105 CMR 410.100
126 Blackmer Street	Basement - windows are missing glass, temporarily boarded up	105 CMR 410.501
	Kitchen - floor tiles are cracked	105 CMR 410.504
	- window seals not airtight	105 CMR 410.501
	Living room –window seals not airtight	105 CMR 410.501

667-3 Development

Location	Noncompliance	Regulation
Unit 808	Living room - water damage on wall	105 CMR 410.500
	- water damage on ceiling	105 CMR 410.500
	- window leaks during rain storms	105 CMR 410.501

APPENDIX II

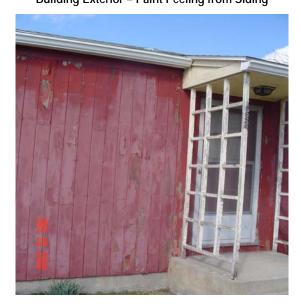
Photographs of Conditions Found

667-1 Elderly Housing Development, Crestview, 592 Summer Street

Entry Way – Peeling and Rotting Door Frame



667-1 Elderly Housing Development, Westwood, 127 Liberty Street Building Exterior – Paint Peeling from Siding





667-1 Elderly Housing Development, Crestview Building Exterior – Peeling and Rotting Porch Posts

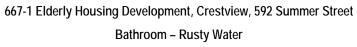
667-1 Elderly Housing Development, Crestview, 592 Summer Street

Building Exterior - Main Door Peeling and Rotting, Screen Door Frame Rotting, and Screen Window Missing





667-1 Elderly Housing Development, Crestview, 592 Summer Street Bathroom – Cracking and Lifting Floor Tiles







667-1 Elderly Housing Development, Crestview, 570 Coggeshall Street

Paint Peeling from Siding