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
LYNN HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005
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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 Lynn 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.

AUDIT RESULTS

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.

For the fiscal year ended June 30, 2005, we inspected 24 of the 389 state-aided housing units managed by the Authority and noted 19 instances of noncompliance with Chapter II of the State Sanitary Code, including peeling paint on walls and ceilings, mold, mildew, and other health and safety hazards. We also inspected 17 building exteriors and found 34 additional instances of noncompliance. In its response, the Authority indicated that its maintenance staff will continue to make the repairs that are within their capabilities, but that certain noncompliance violations cannot be addressed without additional funding.

2. REQUIRED UNIT INSPECTIONS NOT CONDUCTED ANNUALLY

The Authority did not conduct annual dwelling unit inspections as required by the Department of Housing and Community Development Property Maintenance Guide.
To ensure that its dwelling units are in safe, decent, and sanitary condition, the Authority should comply with the guide by conducting annual inspections. In its response, the Authority indicated that annual inspections are being conducted on an April 1 to March 31 fiscal year basis.

3. **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 was 29 days for vacant 667 units and 42 days for vacant 705 units. Moreover, we found that during the audit period, there were over 600 applicants on the Authority’s waiting list. In its response, the Authority indicated that it will concentrate on decreasing unit vacancy days.

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

The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority to meet its expenses. However, the Authority’s records indicated that it was due $205,427 in subsidies at fiscal year-end, while DHCD’s records indicated that it owed the Authority a total of $248,894 at fiscal year-end. In its response, the Authority indicated that the difference between the outstanding balances reported at fiscal year-end could be attributed to the fact that the Authority's federal and state oversight agencies have different mandated fiscal year-end reporting dates, and that the outstanding balances reported represented the operating subsidies due for two different reporting periods, the fiscal years ended March 31, 2005 and June 30, 2005, respectively.

5. **MODERNIZATION INITIATIVES NOT FUNDED**

In response to our questionnaires, the Authority indicated that it has requested modernization funding for capital modernization projects for its state-aided properties from DHCD on numerous occasions, but that these requests have not been funded by DHCD. Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, if the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants could be seriously compromised.

**SUPPLEMENTARY INFORMATION**

**APPENDIX I**

- State Sanitary Code Noncompliance Noted

**APPENDIX II**

- Photographs of Conditions Found
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 Lynn 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, and Board of Health regulations), and whether adequate controls were in place and in effect over site-inspection procedures and records. Our objective was to determine whether the inspections conducted were complete, accurate, up-to-date, and in compliance with applicable laws, rules, and regulations. Further, we sought to determine whether management and DHCD were conducting follow-up actions based on the results of site inspections.

Second, we sought to determine whether 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 LHAs to be visited as part of our statewide review.

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

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

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

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

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

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

To assess whether each LHA was adhering to DHCD procedures for preparing and filling vacant units in a timely manner, we performed selected tests to determine whether the LHA had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the Authority 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 inspected 24 of the 389 state-aided dwelling units at the Lynn Housing Authority, which were located at the Authority’s Caggiano Plaza (Elderly Housing - 667-4), Meadow Court (Elderly Housing 667-3), Olive Street (Elderly Housing 667-1), Essex and Tilton House (Elderly Housing 667-2), McGee House (Elderly Housing 667-5), Shepard Gardens (Handicapped Housing 689), and multiple scattered sites for the 705 Family Housing Development. Our inspection noted 19 instances of noncompliance with Chapter II of the State Sanitary Code for the 24 interior units inspected, and 34 additional instances of noncompliance for the 17 building exteriors inspected. Areas of noncompliance included peeling paint, obstructed entrances, mold and mildew, deteriorated and crumbling concrete stairways, and roof leaks. (Appendix I of our report summarizes the State Sanitary Code violations noted, and Appendix II includes photographs documenting the conditions found).

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

Recommendation

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

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

_The LHA maintenance staff will continue to make repairs to all units in order to provide safe, decent, and sanitary housing. We will correct all non-compliance violations that are within the LHA’s capabilities. Minor repairs such as peeling paint and missing floor tiles are repairs the LHA can correct with in-house labor but non-compliance violations like Woodman Street (667-3B) boilers, Meadow Court (667-3A) pavement/walkways sinking and 705 Family Housing Development’s roof leaks are items that the LHA cannot repair without additional funding. Requests for funds have been made to DHCD through a Condition Assessment Report (CAR) as far back as 1994. Some of which were exact non-compliance violations found during this audit review (i.e. Woodman Street Boilers)._  

_Our goal is to provide a healthy and safe home for all tenants that live in an apartment maintained and operated by the LHA. However, without adequate funding it becomes more and more difficult. As you are well aware the LHA manages a number of state owned properties some of which were constructed in the early 60’s, and this does not include our multiple scattered sites of 705 Family Housing which date back to the early 1900’s. If it is the objective of the Commonwealth of Massachusetts to maintain their housing stock future value as well as to provide decent housing it must begin to fund system updates more frequently._  

_The LHA will address the State Sanitary Code violations identified and will continue to seek additional funding to address major systems issues._

2. **REQUIRED UNIT INSPECTIONS NOT CONDUCTED ANNUALLY**

The goal of annual dwelling unit inspections for the state-aided housing programs is 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. To meet this goal, the DHCD’s Property Maintenance Guide requires local housing authorities (LHAs) to inspect their housing units annually. We reviewed the inspection reports prepared for 24 of the Authority’s 389 dwelling units for FY03, FY04, and FY05 through June 30, 2005 and found that ten units in the 705-C Development were not inspected during 2005.

The Authority’s Executive Director informed us that although the Authority tries to conduct annual inspections of all units, inspections were not conducted on some of the units due to staffing constraints.

**Recommendation**

The Authority should ensure that annual inspections of its housing units are conducted in accordance with DHCD policies and guidelines and request authorization from DHCD to fill vacant maintenance positions.
Auditee’s Response

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

*The LHA does conform to DHCD policies and guidelines... During the audit review it was explained by [the] State Housing Manager that he performs his inspections annually based on the LHA fiscal year of April 1st to March 31st. At the time of the audit the ten (10) units in question were not due for their annual inspection.*

Auditor’s Reply

Inspection reports for fiscal year 2005 should have been conducted between April 1, 2004 and March 31, 2005. We performed our review of fiscal year 2005 inspections in January 2006; therefore, all inspection reports for fiscal year 2005 should have been completed by then. We found no inspection reports for the 10 units in question other than for fiscal years 2003 and 2004.

3. **VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES**

DHCD’s Property Maintenance Guide indicates that each housing authority should reoccupy units within 21 working days of their being vacated. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority’s average turnaround time for reoccupying units was 29 days for the 667 units and 42 days for the 705 units. Moreover, we found that there were over 600 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 Authority attributed noncompliance with the DHCD’s Property Maintenance Guide to vacant maintenance positions and the lack of state funding. The Authority stated that if such positions were filled, unit turnaround time would be reduced and preventative maintenance and repairs of units would be expedited.

Recommendation

The Authority should endeavor to ensure that its vacant units are refurbished and reoccupied within DHCD’s guidelines. These efforts should include requesting special funding from DHCD, hiring temporary help, and entering into mutual and cooperative agreements with surrounding LHAs to assist, on a reimbursement basis, with placing these vacant units back into
circulation as soon as possible. DHCD should obtain and provide the Authority with the funds necessary to fulfill their statutory mandate.

**Auditee’s Response**

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

The LHA recognizes that the vacancy turnaround at the time of the audit was 29 days for 667 units and 42 days for 705 family units. We understand the importance of turning vacancies over as quick as possible to provide housing to all waiting applicants. We will continue to concentrate our efforts to decrease unit vacancy days.

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

The Contract for Financial Assistance between the LHA and the Department of Housing and Community Development (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 the subsidy records to determine whether the amounts were in agreement with balances provided by DHCD. As of June 30, 2005, the Authority’s subsidy records indicated that operating subsidies earned and due the Authority amounted to $205,427, while DHCD’s subsidy records indicated that a $248,894 balance was due the Authority.

**Recommendation**

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

**Auditee’s Response**

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

The Lynn Housing Authority is recording, reporting and reconciling receivables in accordance with federal and state mandates that apply to its March 31st year-end...
The problem appears to be that there are two different governmental entities [U.S. Department of Housing and Urban Development and the Commonwealth Department of Housing and Community Development] operating with two different fiscal year end dates. Obviously, there will be a difference at the respective year-ends as well possibly on a periodic basis as well depending on the applicable accounting criteria that each entity is required to meet.

5. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. Specifically, the Authority indicated that it has applied for funding for the following modernization projects dating back to 1994, none of which have been funded:

<table>
<thead>
<tr>
<th>Date of Request</th>
<th>Program</th>
<th>Project Name</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>1994-1998</td>
<td>705</td>
<td>705 President Street</td>
<td>Flat roof replacement.</td>
</tr>
<tr>
<td>1994-1998</td>
<td>667-3B</td>
<td>Woodman Street</td>
<td>Boiler replacements – these furnaces are far beyond life expectancy.</td>
</tr>
<tr>
<td>1994-1998</td>
<td>667-3A</td>
<td>Meadow Court</td>
<td>Replace property line fence, which is in great disrepair.</td>
</tr>
<tr>
<td>1994-1998</td>
<td>667-4</td>
<td>Caggiano Plaza</td>
<td>Community Room heating and cooling units.</td>
</tr>
<tr>
<td>1994-1998</td>
<td>667-4</td>
<td>Caggiano Plaza</td>
<td>Replacement of three entry metal doors.</td>
</tr>
<tr>
<td>1994-1998</td>
<td>667-2</td>
<td>Essex and Tilton Street</td>
<td>Generator room (2) Maintenance room (1)</td>
</tr>
</tbody>
</table>
Deferring or denying the Authority’s modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. If the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority’s ability to provide safe, decent, and sanitary housing for its elderly and family tenants could be seriously compromised. Lastly, deferring the modernization needs of the Authority 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 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 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 more expensive in both fiscal and human terms.”

**Recommendation**

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

**Auditors Reply**

The LHA agrees that deferring or denying modernization needs can only result in further deteriorating conditions. Further delay or neglect is only going to result in an emergency situation, which in turn will result in higher cost for repairs.
SUPPLEMENTARY INFORMATION

Lynn 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:

<table>
<thead>
<tr>
<th>Development</th>
<th>Number of Units</th>
<th>Year Built</th>
</tr>
</thead>
<tbody>
<tr>
<td>667-1</td>
<td>24</td>
<td>1957</td>
</tr>
<tr>
<td>667-2</td>
<td>50</td>
<td>1959</td>
</tr>
<tr>
<td>667-3</td>
<td>125</td>
<td>1961</td>
</tr>
<tr>
<td>667-4</td>
<td>105</td>
<td>1976</td>
</tr>
<tr>
<td>667-5</td>
<td>50</td>
<td>1900</td>
</tr>
<tr>
<td>705-1</td>
<td>35</td>
<td>Various</td>
</tr>
<tr>
<td>Total</td>
<td>389</td>
<td></td>
</tr>
</tbody>
</table>
# APPENDIX I

State Sanitary Code Noncompliance Noted

### 667-C Elderly Housing Development

<table>
<thead>
<tr>
<th>Location</th>
<th>Noncompliance</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 Meadow Court #4</td>
<td>Living room – peeling paint on walls and ceiling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Kitchen – peeling paint on walls and ceiling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bathroom – peeling paint on walls and ceiling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bedroom 1 – peeling paint on walls and ceiling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>30 Meadow Court #3 (Offline unit)</td>
<td>Living room - floor tiles cracking</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>48 Meadow Court #4</td>
<td>Kitchen – ceiling falling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>170 South Common Street, units 613, 902, and 912 (Offline units)</td>
<td>Water damage on ceilings, walls, and floors</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>Woodman Street Buildings (5 buildings)</td>
<td>Cellar boilers and hot water heaters leaking</td>
<td>105 CMR 410.351</td>
</tr>
<tr>
<td>36 Woodman Street</td>
<td>Building exterior – cement railing support crumbling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>Meadow Court Buildings (12 buildings)</td>
<td>Pavement and walkways sinking</td>
<td>105 CMR 410.750</td>
</tr>
<tr>
<td>2-4 Olive Street</td>
<td>Yard – metal fence collapsing</td>
<td>105 CMR 410.750</td>
</tr>
<tr>
<td>170 South Common Street</td>
<td>Building exterior - roof leaking</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td></td>
<td>Building exterior- gutters falling off</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Yard - driveway sinking</td>
<td>105 CMR 410.750</td>
</tr>
</tbody>
</table>
## 705-C Family Scattered Site Housing Development

<table>
<thead>
<tr>
<th>Location</th>
<th>Noncompliance</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>77 Warren Street</td>
<td>Kitchen – peeling paint on walls</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Kitchen - chipped counter tops</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Kitchen - ceiling falling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Bathroom – peeling paint on walls</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Living room – peeling paint on walls</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>94 Jefferson Street #1</td>
<td>Bathroom – water damage on ceiling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Kitchen – chipped cabinets</td>
<td>105 CMR 410.100</td>
</tr>
<tr>
<td>116 Empire Street # 3</td>
<td>Kitchen – chipped and broken cabinets and counter tops</td>
<td>105 CMR 410.100</td>
</tr>
<tr>
<td>116 Empire Street (Building)</td>
<td>Yard – fence has fallen and is in disrepair</td>
<td>105 CMR 410.750</td>
</tr>
<tr>
<td>19 President Street, Unit #1</td>
<td>Bathroom – floor tiles missing</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>77 Center Street</td>
<td>Building exterior - wooden stairs and porch rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior – peeling paint on porch</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>28 Webster Street</td>
<td>Building exterior - wooden stairs and porch rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - cement foundation cracking</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>24 Webster Street</td>
<td>Building exterior - cracked cement porch and stairs</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - chimney crumbling</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>19 President Street</td>
<td>Building exterior – peeling paint on siding</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - cement stairs cracking</td>
<td>105 CMR 410.750</td>
</tr>
<tr>
<td></td>
<td>Building exterior - wooden stairs and porch rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - roof leaking</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td>119 Chatham Street</td>
<td>Building exterior - roof leaking</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td></td>
<td>Building exterior - bulkhead rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>Address</td>
<td>Description</td>
<td>Code</td>
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<tr>
<td>94 Jefferson Street</td>
<td>Building exterior - roof shingles cracking</td>
<td>105 CMR 410.500</td>
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<tr>
<td></td>
<td>Building exterior - gutter falling off</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - wooden stairs and porch rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - peeling paint on porch</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Yard - wooden fence falling down</td>
<td>105 CMR 410.750</td>
</tr>
<tr>
<td>77- 79 Hanover Street</td>
<td>Building exterior - siding falling off</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - cement foundation cracking</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Yard - wooden fence rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Yard - peeling paint on fence</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>47 Commercial Street</td>
<td>Building exterior – roof leaking</td>
<td>105 CMR 410.501</td>
</tr>
<tr>
<td></td>
<td>Yard – wooden fence rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td>72 Neptune Street</td>
<td>Building exterior - trim and fascia rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - siding falling off</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Building exterior - wooden stairs and porch rotting</td>
<td>105 CMR 410.500</td>
</tr>
<tr>
<td></td>
<td>Yard - back fence had fallen over</td>
<td>105 CMR 410.500</td>
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</table>
APPENDIX II
Photographs of Conditions Found

667-C Elderly Housing Development, 30 Meadow Court (Offline Unit)
Living Room – Floor Tiles are Cracking and Lifting, Some Missing

705-C Family Scattered Site Housing Development, 77 Center Street
Building Exterior – Wooden Stairs and Porch are Rotting

667-C Elderly Housing Development
170 South Common Street, Excessive Water Damage on Ceilings

667-C Elderly Housing Development

170 South Common Street, Excessive Water Damage on Ceilings

667-C Elderly Housing Development, 36 Woodman Street
Building Exterior – Cement Railing Support is Crumbling

667-C Elderly Housing Development, 30 Meadow Court #3 (Offline Unit)
Kitchen – Ceiling is Falling In

667-C Elderly Housing Development, Woodman Street Buildings (5 Buildings)
Cellar Boilers and Hot Water Heaters are Leaking

705-C Family Scattered Site Housing Development
24 Webster Street, Building Exterior
Cracked Cement Porch and Stairs
705-C Family Scattered Site Housing Development, 116 Empire Street
Yard – Fence Has Fallen and is in Disrepair

705-C Family Scattered Site Housing Development
77-79 Hanover Street, Building Exterior – Cement Foundation is Cracking
705-C Family Scattered Site Housing – Development 72 Neptune Street
Building Exterior – Siding is Falling Off

705-C Family Scattered Site Housing Development, 72 Neptune Street
Building Exterior – Back Fence has Fallen Over
705-C Family Scattered Site Housing Development, 119 Chatham Street
Building Exterior Bulkhead Rotting