Thomas P. DiNapoli COMPTROLLER



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OFFICE OF THE NEW YORK STATE COMPTROLLER

DIVISION OF STATE GOVERNMENT ACCOUNTABILITY

NEW YORK STATE DIVISION OF HOUSING AND COMMUNITY RENEWAL

TENANT SELECTION
PRACTICES AT ROCHDALE
VILLAGE

Report 2007-S-92

AUDIT OBJECTIVES

Our objectives were to determine whether Rochdale Village (Rochdale) is selecting tenants for apartments in accordance with applicable requirements, and whether the Division of Housing and Community Renewal (DHCR) is providing the appropriate level of oversight and approval concerning Rochdale's tenant selection practices.

AUDIT RESULTS - SUMMARY

We found that Rochdale is not selecting tenants in accordance with applicable requirements. In addition, DHCR does not effectively monitor the waiting lists and tenant selection practices at Rochdale to ensure apartments are allocated in a fair and equitable manner. Our audit identified numerous tenants who were not selected properly for apartments or were living in apartments without proper authorization. In some cases, tenants were living in apartments reported as vacant, without even paying rent.

Applicants seeking an apartment are placed on a waiting list, and Rochdale is required to offer apartments in the order the applicants appear on the list. However, we identified numerous tenants who were given apartments between January 1, 2007, and July 31, 2007, who had been selected out of order and allowed to unjustly bypass many other eligible tenants on the waiting list. In some cases, Rochdale allocated apartments to individuals who were not even on the list. For example, a tenant moved into a one-bedroom apartment three weeks before being placed on the list. In giving this tenant the apartment, Rochdale officials bypassed the 520 applicants already on the waiting list, many of whom had been waiting several years for housing.

In addition, current tenants who want to transfer to another apartment are required to receive preference over new admission applicants for four out of every five available apartments. However, we found Rochdale is not affording transfer applicants this priority. Many transfer applicants remain on the waiting list for years without ever being offered an apartment, while new admission applicants receive apartments.

We found that DHCR did not provide the necessary oversight to detect and prevent the conditions we found at Rochdale. Rochdale is required to prescreen applicants and to follow proper procedures in allocating apartments. However, DHCR must review and approve the application before a tenant may occupy an apartment. We found that DHCR's level of review was inadequate. For example, we examined the records of 25 tenants who received apartments between January 1, 2007, and April 9, 2007. We noted that DHCR approved 23 of the applications, even though there was no evidence that these tenants were eligible for an apartment based on their placement on the waiting list at the time of approval. In addition, DHCR did not take the necessary measures to ensure that only approved applicants take possession of an apartment. We found that Rochdale did not always forward applications to DHCR for approval, and that numerous tenants were given possession of apartments without such approval. We also found that DHCR has not done an effective job in ensuring that Rochdale keeps the waiting list up to date regarding the status of applicants.

In addition, Rochdale has allowed apartments to remain vacant for extensive periods of time without justification, and DHCR did not monitor this. We calculated that Rochdale lost revenue totaling \$186,560 for 49 apartments that, as of July 31, 2007, had remained vacant

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for more than 30 days. Several apartments had been vacant for more than two years.

Our report contains six recommendations that DHCR should implement to improve and strengthen its oversight of the waiting list and internal controls over tenant selection practices at Rochdale. Three of our recommendations address the need for DHCR to investigate the exceptions we noted and to take remedial action. We also referred our findings to the Investigation Unit of the Office of the State Comptroller (OSC).

DHCR officials generally agreed with the recommendations. They described the actions they have taken, or will be taking, to implement them, including referral to the Attorney General of residents found to have been ineligible for their apartments.

This report, dated April 29, 2008, is available on our website at: http://www.osc.state.ny.us. Add or update your mailing list address by contacting us at: (518) 474-3271 or Office of the State Comptroller Division of State Government Accountability 110 State Street, 11th Floor Albany, NY 12236

BACKGROUND

Rochdale Village, Inc. (Rochdale), is the second largest co-op built under the Mitchell-Lama Law. Located in Queens, New York, it contains 5,860 residential apartments and 2 malls with 71 commercial stores, as well as other real property. Rochdale is governed by the Private Housing Finance Law and is subject to oversight by the Division of Housing and Community Renewal (DHCR) as part of that agency's responsibility for the State's housing program.

operations Rochdale's day-to-day are overseen by a managing agent hired by Rochdale's Board of Directors (Board). On March 26, 2007, the Board elected to dismiss its managing agent, who had served at Rochdale since 1993. A number of key personnel, including the supervisor of the Allocations Department, which assigns apartments to applicants, resigned shortly thereafter. A replacement Allocations Department supervisor was appointed but was terminated three months later, in July 2007. In addition, a new managing agent was appointed, effective August 1, 2007. As of July 2007, Rochdale had a staff of 331 who served in a variety of functions (e.g., operations, maintenance. security. management) at an annual cost of approximately \$13.2 million.

There is great demand for apartments at Rochdale. As a result, applicants often wait many years on waiting lists. Since December 2005, Rochdale has maintained its waiting lists as part of DHCR's online Mitchell-Lama Automated Waiting List. Separate lists are maintained for current tenants seeking to transfer to another apartment within Rochdale and for prospective tenants seeking new admission into the housing development. Tenants on the transfer lists are required to receive certain priority over external applicants on the new admission lists. Each list is further divided based on the size of the apartment requested (one-, two-, or threebedroom). New applicants from the waiting lists filled 180 apartments in 2006, and 64 apartments between January 1, 2007, and April 9, 2007. As of April 19, 2007, a total of 1,379 applicants remained on Rochdale's transfer and new admission waiting lists.

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AUDIT FINDINGS AND RECOMMENDATIONS

Selection of Tenants

The New York Codes, Rules and Regulations (Regulations) set forth the criteria for the administration of the waiting lists for housing such as Rochdale. developments Regulations mandate tenant-selection procedures that are designed to guarantee an equal opportunity, with certain limited exceptions, to all segments of the public who seek to apply for the apartments, and to ensure that the applications are processed in a fair and equitable manner. In addition, Rochdale has established procedures for determining eligibility and screening applicants on the waiting lists. This involves, for example, reviewing the applicant's credit score and verifying employment.

The Regulations require prospective tenants to submit an application for admission to the housing company. Upon receipt, application should be time- and date-stamped and entered directly onto the online waiting lists. Available apartments should be offered to applicants in the order in which their names appear on the waiting lists. Apartment offerings and notifications of apartment availability must be confirmed by mail, and a copy of all notification letters must be retained by the housing company and filed in the individual tenant's folder. Housing companies are also required to annotate the waiting lists to reflect apartment offerings, refusals, and other pertinent information.

The Regulations also require Rochdale to submit all applications to DHCR for approval before it allows occupancy. DHCR is required to review and verify the applicant's eligibility data, as well as determine whether the selected tenant is eligible for the apartment based on the tenant's location on the waiting lists.

We randomly selected 25 of the 64 tenants that Rochdale officials identified to us as new admissions into the housing development between January 1, 2007, and April 9, 2007. We found that the 25 tenants were not entitled to be offered an apartment based on their position on the waiting lists. Each of the 25 tenants was preceded on the waiting lists by between 66 and 520 applicants.

We examined the records for 163 applicants who preceded the 25 sampled tenants on the waiting lists to determine whether these 163 applicants had been offered a Rochdale apartment before they were bypassed. Records indicate the vast majority - 139 of the 163 applicants - were never offered an apartment before they were bypassed. Records for the remaining 24 applicants indicate that each had, at some time, been offered an apartment at Rochdale. However, because the records do not identify the specific apartment offered, we could not readily determine whether these higherranked applicants had been offered the specific apartments given to the 25 sampled tenants.

The most extreme case identified among our sample of 25 was that of a tenant who moved into a one-bedroom apartment on January 5, 2007 - three weeks before her name was even placed on the waiting list. In giving this tenant the apartment, Rochdale officials unjustly bypassed the 520 applicants already on the waiting list, many of whom had been waiting several years for housing. Our detailed review of the records for the 20 applicants directly preceding this tenant on the waiting list provided no evidence that any of these applicants had been offered any apartment before one was offered to the selected tenant.

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The integrity of the waiting lists is further compromised because many applications for Rochdale units are not date-stamped, as required by the Regulations. The application date determines an applicant's placement on the waiting lists and, ultimately, the time that it should take for an applicant to be offered an apartment. For our sample of 25 applicants, 7 had applications that had not been datestamped. An eighth had no application. The 17 remaining applications contained date stamps, but the date on 2 of those applications had not been stamped properly. For example, one application was stamped with the date March 0, 2005. In addition, we found that the date on the stamp machine can be adjusted easily, since the key that allows adjustments is kept in the machine. Applications can be stamped with an earlier date by simply adiusting the date on the machine. Circumventing the process in this manner can unjustly place new applicants ahead of others on the waiting lists.

Our review also identified that Rochdale is not giving transfer applicants the priority they are entitled to in the Regulations. Regulations provide that transfer applicants be given priority over new admission applicants for four of every five available apartments. While Rochdale established separate waiting lists for transfer applicants, Rochdale officials acknowledge that they had not established procedures for providing transfer applicants priority. In fact, Rochdale officials informed us they do not track the movement of transfer tenants, and could not identify the transfer applicants who were given apartments during the period we requested - from January 1, 2007, through April 9, 2007.

As of April 19, 2007, the 1-, 2-, and 3-bedroom transfer waiting lists contained the names of 114, 173, and 103 applicants, respectively. Many of these applicants remain on the transfer waiting lists for years

without ever being offered an apartment. For example, one tenant who applied to transfer to a three-bedroom unit in 1993 was not offered an apartment until November 2006 - thirteen years later. Another tenant who had applied for transfer to a three-bedroom apartment in September 1999 had not been offered any apartment as of April 19, 2007. Rochdale officials informed us that they had rented five three-bedroom units to applicants from the new admission list during the short period of January 1, 2007, to April 9, 2007. During the same period, they also rented 11 two-bedroom and 48 one-bedroom apartments to applicants from the new admission waiting lists. It is apparent that transfer tenants are not being given the preference in obtaining apartments as provided for in the Regulations.

We identified additional improprieties when we examined the list of 109 tenants Rochdale identified as having moved into the development between January 1 and July 31, 2007, as well as the rent rolls for March 2007 and July 2007. These improprieties involved the following seven tenants:

For an unknown period, one tenant, who had never been on a waiting list, lived in an apartment that was reported to be vacant. She did not pay equity (residents' ownership in the housing cooperative through purchase of stock) or carrying charges (rent) until May 22, 2007, when Rochdale staff, conducting a check of vacant apartments after our audit began, found her living in the apartment. The tenant was allowed to remain in the unit and establish ownership of it. The tenant paid rent arrearages only for the short period she acknowledged living there -March 31, 2007, to May 1, 2007. This apartment, which carried a monthly rent of \$436 during 2007, had been

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- reported as vacant; and no rent had been collected for the previous two and a half years.
- Three transfer tenants were living, without paying rent, in apartments reported as vacant. Two of these tenants had been living in the apartments for two years the third for more than four months when their occupancy was discovered by Rochdale staff conducting a check of vacant apartments after our audit began. As of July 2007, Rochdale collected \$59,000 in rent arrearages and was due an additional \$4,000 from these tenants for the period they failed to pay rent.
- One tenant had been denied succession rights to a deceased relative's apartment by the State Supreme Court in October 2006. Even though this tenant's appeal was also denied by DHCR in November 2006, Rochdale allowed him to maintain possession of the apartment and become the tenant of record on the rent roll as of July 2007.
- One tenant, whose request for transfer to another apartment had been denied by DHCR in November 2006, was allowed by Rochdale to transfer into that same unit one year later. Rochdale officials held the apartment vacant for the year, and no attempts were made to rent the unit. Rochdale did not request DHCR approval this time. It appears that the apartment was being held vacant specifically for this tenant. Rochdale lost approximately \$8,700 in rent revenue by keeping this apartment vacant for the year.

tenant Rochdale One had two apartments at the same time. tenant originally resided in a onebedroom unit. In April 2004, the tenant transferred into a threebedroom unit. The transfer application was not approved by DHCR. In September 2006, the tenant obtained a second apartment, based on a February 2006 new admission application, again without DHCR approval. Rochdale officials informed us that the tenant's sister is residing in the three-bedroom unit, while the tenant of record occupies the onebedroom unit. This violates the Regulations, which require that Rochdale apartments be used as the tenant's primary residence. A tenant cannot have two primary residences at the same time.

We referred these matters to the Investigation Unit of the Office of the State Comptroller (OSC).

DHCR Monitoring

DHCR is required to oversee the operations and activities of Rochdale. DHCR's oversight of tenant selection practices is critical to ensuring the State's limited housing stock is offered to applicants in a fair and equitable manner and in accordance with relevant Regulations. Overall, we found that DHCR has not provided adequate oversight over this critical function.

Regulations require DHCR officials to review and approve all applicants who are offered apartments at Rochdale, before they give the tenant possession of the unit. This review includes verifying that the applicant meets eligibility criteria for the housing offered, as well as determining whether the applicant was

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selected properly based on the applicant's location on the waiting lists.

We found that Rochdale frequently gives new tenants possession of apartments without informing DHCR. Further, while we found evidence that DHCR does perform some review of the applicant files that are submitted by Rochdale, the level of review is not adequate. In fact, DHCR approved the award of apartments to 23 of the 25 tenants we sampled who received apartments between January 1, 2007, and April 9, 2007, even though these tenants were not eligible for an apartment based on their placement on the waiting lists at the time of approval.

The remaining two tenants were provided apartments without DHCR approval or knowledge. Rochdale did not request DHCR approval of these tenants, and DHCR oversight did not notice that these tenants had been given apartments. We determined that neither of the two tenants was eligible for the units based on their location on the waiting lists.

Other audit tests further found that tenants frequently given possession apartments without DHCR knowledge or approval, and that the waiting lists did not reflect the status of applicants accurately. For example, as of April 19, 2007, thirty applications on the new admission waiting list were reported as "pending." This designation indicates that an applicant has been afforded an apartment, but still needs either DHCR approval or additional documentation (e.g., a credit report). When we compared these 30 applicants with Rochdale's March 31, 2007, rent rolls, we noted that 20 of the 30 were, in fact, already in their Rochdale apartments. DHCR officials informed us that applications for the 20 tenants had never been submitted to them for their approval, and they were not

aware that these applicants were already occupying apartments.

When we discussed our findings with Rochdale and DHCR officials, they explained that comments, referred to as annotations, placed next to the names of applicants had caused confusion in determining the proper order of applicants on the waiting list. Annotations were frequently used to document an applicant's preference for a certain building or location, or to document some other communication with an applicant. Oddly, Rochdale officials explained that, when determining which applicant was next on the waiting list, their practice was to bypass applicants who had an annotation appearing next to their names - regardless of the content of the note. DHCR officials explained that the annotations justified some of the bypass incidents; however, the officials acknowledge that they did not review the details of the annotations - or verify their accuracy or continued applicability - as they were trying to work with Rochdale staff to improve prior waiting list mismanagement without exacerbating vacancy rates. Our review, however, found that, even after considering the annotations, none of our 25 sampled tenants was eligible for the apartment given to them, based on their location on the waiting list.

Vacant Apartments

DHCR needs to enhance its oversight over apartments reported as vacant, to ensure that the apartments are returned to the rent rolls expeditiously and do not become subject to improper occupancy. Our finding that several apartments reported as vacant were actually occupied for extensive periods without DHCR's knowledge reflects a significant breakdown in controls.

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Furthermore, to maximize revenue, apartments should be turned over to new tenants as soon as possible. Despite a waiting list exceeding 1,300 applicants seeking access to the State's limited middle-income housing stock, we found that many Rochdale apartments remain vacant for extended periods with no apparent justification. Rochdale reported 63 vacant apartments as of July 31, 2007. (An additional apartment was removed from the market due to substantial water damage.) These 63 apartments had been vacant as of July 31, 2007, for periods ranging from 5 days to 4.25 years, including 49 apartments that had been vacant for more than 30 days. (Rochdale takes 30 days, on average, to restore and reallocate apartments between tenants.) Rochdale officials who were in charge at the time our audit began told us that the apartments that had been vacant for substantial periods unoccupied due to leaks and water damage. However, in August 2007, when we observed the ten apartments that were vacant for the longest period, we found no visible evidence of water damage or other reasons for lack of occupancy. Rochdale officials were able to explain neither the reason(s) for the lengthy vacancies nor the reason these units remained As of July 31, 2007, Rochdale had lost revenue of approximately \$186,560 due to the 49 vacancies.

Recommendations

- 1. Work with Rochdale to establish tenant selection procedures that comply with Regulations, and ensure that:
- applications are properly date- and timestamped and are entered on the waiting list:
- waiting lists are kept accurate and current and reflect apartment offerings, refusals, and other pertinent information;

- tenants are selected properly from the waiting list;
- transfer applicants are given priority for apartments; and
- applicants receive DHCR approval before taking possession of an apartment.
- 2. Improve oversight over Rochdale's tenant selection practices to ensure Rochdale compliance with Regulations, as well as internal procedures.
- 3. Improve DHCR review of applications submitted to ensure that tenants are selected in accordance with the Regulations.
- 4. Determine whether applicants who received apartments without DHCR's approval met eligibility criteria. If not, take appropriate remedial action.
- Investigate the suspicious circumstances under which tenants included in our report have obtained apartments in violation of the Regulations, and take appropriate remedial action.
- 6. Monitor vacated apartments to ensure that they are rented expeditiously. Investigate apartments that are reported as vacant for extensive periods of time.

AUDIT SCOPE AND METHODOLOGY

We conducted our performance audit in accordance with generally accepted government auditing standards. We audited tenant selection practices at Rochdale as well as DHCR's related oversight for the period January 1, 2007, through July 31, 2007. We reviewed the online waiting lists as of April 19, 2007, as well as the eligibility of 25 tenants who were assigned apartments in the development between January 1, 2007, and July 31, 2007. To accomplish our objectives,

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we reviewed and analyzed pertinent policies and laws, and interviewed DHCR and Rochdale officials to confirm and enhance our understanding of the online waiting lists and tenant selection procedures. In addition, we reviewed tenants' housing files and Rochdale rent rolls, as well as vacancy reports. We also visited vacant apartments.

In addition to being the State Auditor, the Comptroller performs certain constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to certain boards, commissions and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

AUTHORITY

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1, of the State Constitution and Article II, Section 8, of the State Finance Law.

REPORTING REQUIREMENTS

Draft copies of the matters contained in this report were provided to DHCR officials for their review and comment. Their comments were considered in preparing this report, and are included as Appendix A.

Within 90 days of the final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Division of Housing and Community Renewal shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

CONTRIBUTORS TO THE REPORT

Major contributors to this report include Frank Houston, Cindi Frieder, Myron Goldmeer, Diane Gustard, Hector Arismendi, Slamon Sarwari, Feifei Pei, and Paul Bachman.

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APPENDIX A - AUDITEE RESPONSE

Eliot Spitzer Governor



Deborah VanAmerongen Commissioner

New York State Division of Housing and Community Renewal 25 Beaver Street

25 Beaver Street New York, NY 10004

Ms. Cindi Frieder
Office of the State Comptroller
Division of State Government Accountability
123 William Street, 21st floor
New York, NY 10038

March 6, 2008

Re: OSC Draft Audit Report 2007-S-92 Dated February 6, 2008

Dear Ms. Frieder:

DHCR has carefully reviewed the findings and recommendations in the above referenced report which address tenant selection practices at Rochdale Village. Although DHCR's review of the draft audit report identified some instances wherein certain findings appear to have been incorrectly stated in part, we are generally in agreement with OSC's statement of findings and recommendations. Our response to the draft report focuses entirely on actions already undertaken and those to be taken to address the OSC report recommendations.

The following is our detailed response to the six (6) recommendations listed on page eight (8) of the draft audit report.

Recommendation 1

Work with Rochdale to establish tenant selection procedures that comply with Regulations, and to ensure that:

- Applications are properly date and time stamped and are entered on the waiting list;
- Waiting lists are kept accurate and current and reflect apartment offerings, refusals, and other pertinent information;
- Tenants are selected properly from the waiting list;
- Transfer applicants are given priority for apartments; and
- Applications receive DHCR approval before taking possession of an apartment.

Response

DHCR has been working with the new Managing Agent for Rochdale Village to establish tenant selection procedures that comply with our regulations. As the report notes in passing, Rochdale terminated its long term agent prior to the commencement of this audit and has had two different

> Web Site: www.dhcr.state.ny.us Email address: dhcrinfo@dhcr.state.ny.us

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people in charge of the allocations department during the scope of the OSC audit. A new managing agent was hired effective August 1, 2007. On August 22, 2007, DHCR provided Automated Waiting List (AWL) training for the new management staff, which also included a review of proper tenant selection practices. Subsequent meetings in October, 2007 and January, 2008 at DHCR were held with the managing agent to review their progress in updating the AWL and in canvassing both the external and internal waiting lists to identify eligible applicants still interested in an apartment. The new agent was also instructed that no stock certificate be signed or issued by the board unless accompanied by a DHCR approval form (HM-14) and an executed lease.

The time and date stamp machine can no longer be adjusted by Rochdale Village allocation office staff as the adjustment key has been removed from the machine and is in the possession of the new assistant general manager. Two staff persons at Rochdale Village have been assigned to time and date stamp all applications upon receipt which are then logged onto the AWL. In addition, DHCR will not approve apartment assignments unless the AWL has been properly annotated and our rules on order of selection are followed.

Recommendation 2

Improve oversight over Rochdale's tenant selection practices to ensure Rochdale compliance with Regulations, as well as internal procedures.

Response

Prior to the issuance of this draft report, in August, 2007, DHCR conducted a comprehensive rent roll audit of Rochdale Village, which focused on tenant selection activity between March, 2004 and May, 2007. The audit findings reflected a number of deficiencies in the processing of new admission, transfer and succession applications by the prior agent. Rochdale Village was advised of our findings on October 16, 2007 and required to implement internal controls to address the noted deficiencies.

Recommendation 3

Improve DHCR review of applications submitted to ensure that tenants are selected in accordance with the Regulations.

<u>Response</u>

To assist staff and housing companies to ensure that tenants are selected in accordance with regulations, training on the AWL and other tenant selection requirements has been held. Applications are not approved by DHCR unless the AWL has been properly annotated to justify the eligibility of the next applicant. In addition, DHCR field staff have been instructed to spot check applicant/shareholder folders and perform random audits of new move-ins during site visits to verify that the documentation in the folders corroborates the information indicated in the AWL annotations and that only approved occupants actually move in to the units. Lastly, enhancements and modifications to the AWL that will enhance tenant selection monitoring are being developed in-house. DHCR also intends to soon release a web-based system that will allow public access to waiting lists. This will allow applicants to view their position on the list and submit changes or update information such as a new mailing address or change in family composition.

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Recommendation 4

Determine whether applicants who received apartments without DHCR's approval met eligibility criteria. If not, take appropriate remedial action.

Response

Rochdale is in the process of reviewing each file for occupants identified as not having received prior DHCR approval. Existing occupants who are identified to be ineligible will be evaluated for possible referral to the Attorney General for further appropriate action.

Recommendation 5

Investigate the suspicious circumstances under which tenants included in our report have obtained apartments in violation of the Regulations, and take appropriate remedial action.

Response

As stated earlier, key department heads at Rochdale Village were either terminated or resigned soon after the prior agent was terminated in March, 2007. The new agent has assigned replacement staff to the Allocation, Maintenance and Purchasing Departments. The housing company has indicated that they are awaiting the results of the OSC Investigation Unit with respect to the alleged actions of the former management staff. Further, DHCR will refer residents found to have been ineligible to the Attorney General for further appropriate action.

Comment

Recommendation 6

Monitor vacated apartments to ensure that they are rented expeditiously. Investigate apartments that are reported as vacant for extensive periods of time.

<u>Response</u>

DHCR field staff will continue to monitor the re-sale of apartments and length of apartment vacancies. During scheduled field visits, vacant apartments will be visited to ensure the accuracy of the housing company's monthly vacancy reports submitted to DHCR. As a cost savings measure and to expedite the turnover of apartments, the housing company has taken steps to establish an in-house maintenance staff representing various trades (electrical, plumbing, painting).

Sincerely Yours

Rosina Abramson, Deputy Commissioner

212 480 6727

Web Site: www.dhcr.state.ny.us Email address: dhcrinfo@dhcr.state.ny.us

* State Comptroller's Comment: As of the date of the final report, review by OSC's Investigation Unit is still ongoing.

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