

City of New York

OFFICE OF THE COMPTROLLER

Scott M. Stringer COMPTROLLER



FINANCIAL AUDIT

Marjorie Landa Deputy Comptroller for Audit

Audit Report on the Human Resources Administration's Vendor Performance Evaluations

FK19-092A June 30, 2020 http://comptroller.nyc.gov



The City of New York Office of the Comptroller Scott M. Stringer

June 30, 2020

To the Residents of the City of New York:

My office has audited the Human Resources Administration (HRA) to determine whether HRA evaluated and documented vendor performance in accordance with the Procurement Policy Board (PPB) Rules. We perform audits such as this to increase accountability and to ensure that the City awards funds only to vendors that demonstrate a satisfactory record of performance and business integrity and that are capable of fully and satisfactorily meeting future contract requirements.

In 2017, the Mayor's Office of Contract Services launched the Procurement and Sourcing Solutions Portal (PASSPort), an online portal, to facilitate the City's procurement process and allow agencies to document and monitor vendor performance evaluations (PEs) in one centralized system. During Fiscal Year 2018, HRA was responsible for evaluating vendors' performance for 589 contracts with a combined maximum value of \$2.76 billion.

The audit found that HRA generally did not annually evaluate and document vendor performance in accordance with the PPB Rules. Based on our review of the above-mentioned 589 contracts, HRA did not complete PEs for 267 contracts (45.33 percent), and did not complete PEs timely for 315 contracts (53.48 percent). HRA completed PEs timely for only 7 contracts (1.19 percent). HRA failed to evaluate vendors' performance for contracts at all or timely because it did not ensure that PEs were in fact created on contract anniversary dates, improperly requested PE exemptions for contracts, did not adequately monitor staff to ensure they completed PEs, and did not establish policies and procedures for PEs.

The audit recommends that HRA should: (1) ensure that PEs are completed and finalized within 90 days of the contract anniversary date; (2) review PASSPort data regularly to ensure that it includes data for all HRA contracts except for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits; (3) request exemptions only for contracts that meet the PPB Rules PE exemption criteria and contracts for which services or goods were not provided during the evaluation period; (4) ensure that the ACCO and ACCO staff monitor PE completion and periodically remind staff to complete PEs; and (5) develop written policies and procedures, communicate them to staff, and train staff on their responsibilities for completing PEs.

The results of the audit have been discussed with HRA officials, and their comments have been considered in preparing this report. HRA's complete written response is attached to this report. If you have any questions concerning this report, please e-mail my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

Scott M. Stringer

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THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER FINANCIAL AUDIT

Audit Report on the Human Resources Administration's Vendor Performance Evaluations

FK19-092A

EXECUTIVE SUMMARY

The Human Resources Administration (HRA) is responsible for, among other things, providing temporary assistance and work support to New Yorkers in need through a variety of programs such as temporary cash assistance, Medicare, food stamps, career services, home health care, child care, adult protective services, assistance to victims of domestic violence, HIV/AIDS support services, and child support enforcement. HRA contracts with vendors to provide goods and services on its behalf and to support its operations and, in doing so, is required to follow the Procurement Policy Board (PPB) Rules.

Section 4-01(b) of the PPB Rules states,

A performance evaluation shall be done no less than once annually except that for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits, an evaluation report shall be prepared only in cases of deficient performance.

Further, the PPB Rules do not apply to certain procurements as specified in §1-02(d) and certain transactions specified in §1-02(f), "provided [in the latter case] the ACCO determines that the process to be followed is in the best interest of the City and states the basis therefor." The transactions specified in §1-02(f) include government-to-government contracts, the provision of work or services by State-regulated public utilities, State- or federally-regulated cable television and other public services, professional memberships, and subscriptions.

The Mayor's Office of Contract Services (MOCS) facilitates and oversees citywide procurement activities. The Director of MOCS is the City Chief Procurement Officer (CCPO) and is responsible for coordinating and overseeing the procurement activity of Mayoral agency staff. Within each Mayoral agency, the Agency Chief Contracting Officer (ACCO) is responsible for organizing and supervising the procurement activity of subordinate agency staff in conjunction with the CCPO.

In 2017, MOCS launched the Procurement and Sourcing Solutions Portal (PASSPort), an online portal, to facilitate the City's procurement process and allow agencies to document and monitor vendor performance evaluations (PEs) in one centralized system. The PASSPort Performance

Evaluations for Agencies user manual states that, "PASSPort will create a draft PE for the contract 12 months after the contract start date."

During Fiscal Year 2018, HRA was responsible for evaluating vendors' performance for 589 contracts that were registered with the Comptroller's Office, with a combined maximum value of \$2.76 billion.

Audit Findings

HRA generally did not annually evaluate and document vendor performance in accordance with the PPB Rules. Based on our review of the above-mentioned 589 contracts, HRA did not complete PEs for 267 contracts (45.33 percent), and did not complete PEs timely for an additional 315 contracts (53.48 percent). HRA completed PEs timely for only 7 contracts (1.19 percent).

HRA failed to evaluate vendors' performance for contracts at all or timely because it did not ensure that PEs were in fact created on contract anniversary dates, improperly requested PE exemptions for contracts, did not adequately monitor staff to ensure they completed PEs, and did not establish policies and procedures for PEs.

Audit Recommendations

Based on our findings, we made the following five recommendations to HRA:

- HRA should ensure that PEs are completed and finalized within 90 days of the contract anniversary date;
- HRA should review PASSPort data to ensure that it includes data for all contracts except for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits;
- HRA should request exemptions only for contracts that meet the PPB Rules' PE exemption criteria and contracts for which services or goods were not provided during the evaluation period;
- HRA should ensure that the ACCO and ACCO staff monitor PE completion and periodically remind staff to complete PEs; and
- HRA should develop written policies and procedures, communicate them to staff, and train staff on their responsibilities for completing PEs including, but not limited to, completion timeframes, and monitoring and follow-up activities.

Agency Response

HRA provided a Corrective Action Plan, which HRA stated "identifies the actions already taken, as well as actions that will be taken, to address the recommendations in the report. While the agency does not agree with all of the report's recommendations, we agree that further monitoring and training of staff are needed."

AUDIT REPORT

Background

HRA is responsible for, among other things, providing temporary assistance and work support to New Yorkers in need through a variety of programs such as temporary cash assistance, Medicare, food stamps, career services, home health care, child care, adult protective services, assistance to victims of domestic violence, HIV/AIDS support services, and child support enforcement. HRA contracts with vendors to provide goods and services on its behalf and to support its operations and, in doing so, is required to follow the PPB Rules.

Section 4-01(b) of the PPB Rules states,

The agency shall monitor the vendor's performance against such standards and indicators on an ongoing basis and sufficiently far in advance of the end of the contract term to determine whether an existing contract should be extended, renewed, terminated, or allowed to lapse. A performance evaluation shall be done no less than once annually except that for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits, an evaluation report shall be prepared only in cases of deficient performance.

Further, the PPB Rules do not apply to certain procurements as specified in §1-02(d) and certain transactions specified in §1-02(f), "provided [in the latter case] the ACCO determines that the process to be followed is in the best interest of the City and states the basis therefor." The transactions specified in §1-02(f) include government-to-government contracts, the provision of work or services by State-regulated public utilities, State- or federally-regulated cable television and other public services, professional memberships, and subscriptions.

MOCS facilitates and oversees citywide procurement activities. The Director of MOCS is the CCPO and is responsible for coordinating and overseeing the procurement activity of Mayoral agency staff. The ACCO is responsible for organizing and supervising the procurement activity of subordinate agency staff in conjunction with the CCPO.

Section 1-01(e) of the PPB Rules defines procurement activity as "all phases of contract administration, including ... evaluation of performance." Accordingly, the PPB Rules §4-01(b) and (c) state, respectively, that "the CCPO shall establish procedures to ensure systematic evaluation of vendor performance" and "establish a centralized computerized database for storage and retrieval of the evaluation."

In 2017, MOCS launched PASSPort, an online portal, to facilitate the City's procurement process and allow agencies to document and monitor vendor PEs in one centralized system. City agencies use PASSPort to (1) assign, complete, review, and send PEs to vendors, and (2) assist in making contract decisions to extend, renew, terminate or allow existing contracts to lapse, and award additional contracts.

During Fiscal Year 2018, HRA was responsible for evaluating vendors' performance for 589 contracts that were registered with the Comptroller's Office, with a combined maximum value of \$2.76 billion.

Objective

The objective of this audit was to determine whether HRA evaluated and documented vendor performance in accordance with the PPB Rules.

Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93 of the New York City Charter.

This audit covered PEs generated or due to be generated in Fiscal Year 2018 (July 1, 2017 to June 30, 2018) which evaluated vendor performance from the prior year. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results

The matters covered in this report were discussed with HRA officials during and at the conclusion of this audit. HRA officials were notified of our findings during the course of the audit and agreed that an exit conference was not necessary. On June 9, 2020, we submitted a draft report to HRA officials with a request for comments. We received HRA's written response on June 25, 2020.

HRA provided a Corrective Action Plan, which HRA stated "identifies the actions already taken, as well as actions that will be taken, to address the recommendations in the report. While the agency does not agree with all of the report's recommendations, we agree that further monitoring and training of staff are needed." In its response, HRA agreed with three recommendations and disagreed with two recommendations.

Specifically, HRA disagreed with the report's recommendation that the agency ensure that PEs are completed and finalized within 90 days of the contract anniversary date. HRA stated that "there is no requirement in the Procurement Policy Board Rules to complete performance evaluation[s] within 90 days" and that it "will continue to use 90 days as an aspirational target for completing Performance Evaluations."

However, as this report notes, MOCS is responsible for coordinating and overseeing the procurement activity of Mayoral agency staff. In that capacity, MOCS informed the HRA ACCO that "[t]raditionally, PEs are expected to be completed within 90 days of the anniversary of the contract start date (for length of contract)." Therefore, HRA should ensure that PEs are completed and finalized within 90 days of the contract anniversary date, in accordance with the guidance MOCS provided, so that HRA's own and other City agencies' procurement personnel can make fully informed contracting decisions concerning vendors.

HRA also disagreed with the report's recommendation to request PE exemptions only for contracts that meet the PPB Rules' PE exemption criteria and contracts for which services or goods were not provided during the evaluation period. HRA asserted that there were numerous

"other instances where a performance evaluation would not be needed" such as when "the period to be evaluated is less than six months." However, the PPB Rules do not provide for a number of the exemptions HRA referenced, and HRA did not cite a specific legal or authoritative basis for them.

In addition, HRA stated that "the period reviewed by the auditors was the very first year that PEs were due in PASSPort. We expect that as the system continues to improve and staff become more familiar with its functions, error rates will progressively improve."

However, based on our review of PEs generated or due to be generated in Fiscal Year 2019 (July 1, 2018 to June 30, 2019), HRA's performance did not improve, and the issues cited in the report persisted. For Fiscal Year 2019, HRA was responsible for evaluating 575 contracts. Based on our review, HRA did not complete PEs at all or did not complete PEs which fully covered the evaluation period for 423 contracts (73.57 percent), and did not complete PEs timely for 116 contracts (20.17 percent). HRA complete PEs timely for only 36 contracts (6.26 percent).

Finally, HRA disagreed with several findings. We address those disagreements in the relevant sections of this report, below.

After reviewing HRA's response, we find no basis to alter any of the report's findings and recommendations.

The full text of HRA's response is included as an addendum to this report.

FINDINGS

HRA generally did not annually evaluate and document vendor performance in accordance with the PPB Rules. This issue is discussed in detail below and is also the subject of a separate Audit Report on MOCS' Monitoring of Vendor Performance Evaluations (Audit # FK19-091A) which as of this date is still in process.

HRA Did Not Complete PEs At All or Did Not Complete Them Timely

As previously stated, §4-01(b) of the PPB Rules states,

A performance evaluation shall be done no less than once annually except that for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits, an evaluation report shall be prepared only in cases of deficient performance.

Further, the PPB Rules do not apply to certain procurements as specified in §1-02(d) and certain transactions specified in §1-02(f), "provided [in the latter case] the ACCO determines that the process to be followed is in the best interest of the City and states the basis therefor." The transactions specified in §1-02(f) include government-to-government contracts, the provision of work or services by State-regulated public utilities, State- or federally-regulated cable television and other public services, professional memberships, and subscriptions.¹

HRA provided us with emails that it received from MOCS informing the HRA ACCO that "[t]raditionally, PEs are expected to be completed within 90 days of the anniversary of the contract start date (for length of contract)."

During Fiscal Year 2018, HRA was responsible for evaluating vendors' performance on 589 contracts. In its Calendar Year 2018 Comptroller's Directive #1 Checklist, HRA stated that procurement personnel received training in the PPB Rules and that it evaluated vendor performance at least once a year in accordance with the PPB Rules and CCPO procedures. However, based on our review of PASSPort data as of July 16, 2019 for the above-mentioned 589 contracts, HRA did not complete PEs for 267 contracts (45.33 percent), and did not complete PEs timely for 315 contracts (53.48 percent).² Those 582 contracts included vendors that provided emergency domestic violence shelters, HIV/AIDS support services, food services, career services, and other services. HRA completed PEs timely for only 7 contracts (1.19 percent).

HRA failed to evaluate vendors' performance for contracts at all or timely because:

- HRA did not ensure that PEs were in fact created in PASSPort;
- HRA improperly exempted contracts from PEs;
- HRA did not adequately monitor staff to ensure that they completed PEs; and

¹ The PPB Rules §1-02(f)(1) states that government-to-government contracts are "grants or contracts between City agencies and other governments or any public authority or public benefit corporation."

² HRA staff completed PEs between 9 and 548 days late. On average, HRA staff completed PEs 259 days late.

• HRA did not establish formal written procedures for PEs.

The above-listed issues are discussed in detail below.

Section 2-08(a)(1) of the PPB Rules states that "[p]urchases shall be made from, and contracts shall be awarded to, responsible prospective contractors only." Further, Section 2-08(b)(2) states that "[f]actors affecting a contractor's responsibility may include ... a satisfactory record of performance" and "a satisfactory record of business integrity." Accordingly, Section 2-08(g) of the PPB Rules states that "ACCOs shall use [PASSPort] PEs and the [PASSPort] database of debarred, suspended, and ineligible vendors when making responsibility determinations and ultimately, purchasing and contracting decisions."³

Since HRA did not evaluate vendors' performance on most contracts either at all or timely, HRA and other City agency procurement personnel cannot make fully informed contracting decisions concerning those vendors. As a result, the City may extend, renew, or award contracts and funds to vendors that have not demonstrated a satisfactory record of past performance, are not capable of fully or satisfactorily meeting future contract requirements, or lack the business integrity to justify the award of public tax dollars.

HRA Response: "There are several finding details with which we disagree, as shown in the attached spreadsheet based on data supplied by MOCS...

i. 19 more PEs were completed than reported."

Auditor Comment: Based on our review of PASSPort data, we determined that from July 17, 2019 to February 14, 2020, HRA completed the 19 additional PEs in response to, and during the course of, our audit. This report does not count those 19 PEs among the PEs that HRA had completed as of July 16, 2019, because they were completed after that date.

HRA Did Not Ensure that PEs Were Created

As previously mentioned, the Director of MOCS is the CCPO and is responsible for coordinating and overseeing the procurement activity of Mayoral agency staff. The agency ACCO is responsible for organizing and supervising the procurement activity of subordinate agency staff in conjunction with the CCPO. City agencies use PASSPort to assign, complete, review, and send PEs to vendors. The PASSPort Performance Evaluations for Agencies user manual states that, "PASSPort will create a draft PE for the contract 12 months after the contract start date." However, during Fiscal Year 2018, PASSPort did not create PEs for 153 of the 589 HRA contracts on their contract anniversary dates.

HRA relied on PASSPort and did not ensure that PEs were created—either automatically or manually in PASSPort—on contract anniversary dates. For 12 of the 153 contracts, HRA discovered that the PEs were not created automatically on contract anniversary dates. Subsequently, HRA notified MOCS and requested that MOCS create PEs for the 12 contracts. Since HRA did not review PASSPort data to ensure that PEs were created on contract anniversary dates, those 12 PEs were created between 300 and 349 days late.

³ In 2017, MOCS launched PASSPort, which replaced the Vendor Exchange System (VENDEX), to facilitate the City's procurement process and allow agencies to document and monitor vendor PEs.

For the remaining 141 of the 153 contracts where PEs were not created, HRA appears to have been unaware that PEs were not created in PASSPort. For those 141 contracts, PASSPort did not create PEs at all or PASSPort did not create PEs which fully covered the evaluation period. On September 19, 2019, we provided HRA with a list of contracts that were not evaluated, which included the above-mentioned 141 contracts. On February 3, 2020, we requested that HRA provide us with documentation to show that it: (1) notified MOCS and requested that MOCS create PEs for those 141 contracts and (2) completed PEs.

On February 13, 2020, HRA informed us that it created and completed or was in the process of completing PEs for 44 contracts. However, based on our subsequent review of PASSPort data, we determined that from July 17, 2019 to February 14, 2020, HRA did not complete *any* additional PEs for our audit scope period and only two PEs were in process.

HRA claimed that PEs were not required for 39 contracts on the basis that the contracts did not fall within our scope period, i.e., PEs generated or due to be generated in Fiscal Year 2018 (July 1, 2017 to June 30, 2018) which evaluated vendor performance from the prior year. However, based on our FMS data, HRA should have completed PEs for all 39 contracts because work or service was in fact provided during the evaluation period.

Additionally, HRA claimed that PEs were not required for 14 contracts on the basis that the contracts were for "one year only" (6 contracts), the contracts were registered late (4 contracts), or the contracts were for radio services or real estate monitoring services (4 contracts).⁴ However, the PPB Rules do not provide exceptions based on contract duration, registration status, or service type, and HRA did not cite a specific legal or authoritative basis for such exceptions.

HRA also claimed that PEs were not required for seven contracts on the basis that they were for requirements contracts (four contracts) or intergovernmental contracts (three contracts).⁵ However, the PPB Rules do not provide exceptions based on those procurement methods. Furthermore, intergovernmental contracts are expressly required to be evaluated. In a memorandum dated March 19, 2015, MOCS informed all City agency ACCOs that "[a]gencies are required to conduct Performance Evaluations (PEs) annually *for all intergovernmental contracts*." [Emphasis in original.]

Finally, HRA claimed that PEs were not required for two contracts on the basis that the contracts were below the small purchase limit. However, based on our review of FMS data, those two contracts exceeded the small purchase limit.⁶

For the remaining 36 contracts, HRA acknowledged that it did not create PEs (35 contracts) or did not respond (1 contract). However, HRA failed to either state that it would create and complete PEs for those 36 contracts or, in the alternative, cite a specific legal or authoritative basis for exempting them.

⁴ HRA claimed that two contracts were for radio subscription services and one contract was for radio advertising. However, based on our review of FMS data, all three contracts were for radio advertising.

⁵ The PPB Rules §1-01(e) defines intergovernmental purchases as the "issuance of a purchase order or contract to procure goods, services, or construction through the United States General Services Administration, any other federal agency, the New York State Office of General Services, any other state agency or in cooperation with another public agency subject to the rules set forth herein."

⁶ HRA claimed that a PE was not required for one contract on the basis that it is a requirements contract and below the small purchase limit.

HRA Response: "There are several finding details with which we disagree, as shown in the attached spreadsheet based on data supplied by MOCS...

ii. 3 more PEs were created than reported by NYCC."

Auditor Comment: Based on our review of PASSPort data, we determined that from July 17, 2019 to February 14, 2020, in response to, and during the course of, our audit, the three additional PEs were created but not completed.

HRA Response: "There are several finding details with which we disagree, as shown in the attached spreadsheet based on data supplied by MOCS...

iii. 43 contracts had no PEs created in PASSPort for legitimate reasons (42 because they remained in Vendex...)."

Auditor Comment: In its response, HRA states that PEs for 42 contracts remained in VENDEX. However, HRA's "Exhibit A" states only that 41 contracts remained in VENDEX.

HRA asserts that relevant records for 41 contracts were recorded in VENDEX rather than PASSPort. However, HRA did not provide us with documentation to show that PEs for the 41 above-mentioned contracts were created in VENDEX for our audit scope period. Further, if PEs were in fact created and completed in VENDEX, those PEs should have migrated to PASSPort. Accordingly, our finding as to those 41 contracts remains that PEs should have been, but were not, recorded in PASSPort.

HRA Improperly Requested PE Exemptions for Contracts

As previously mentioned, PPB Rules §4-01(b) states that City agencies shall annually complete PEs for contracts and provides exceptions "for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits." Further, the PPB Rules do not apply to certain procurements as specified in §1-02(d) and certain transactions specified in §1-02(f), "provided [in the latter case] the ACCO determines that the process to be followed is in the best interest of the City and states the basis therefor." The transactions specified in §1-02(f) include government-to-government contracts, the provision of work or services by State-regulated public utilities, State- or federally-regulated cable television and other public services, professional memberships, and subscriptions. However, based on our review of the PASSPort Performance Evaluations Canceled because Exempt from Evaluation report, HRA did not complete PEs for six contracts for which it improperly requested and MOCS approved exemptions.⁷

HRA claimed that three contracts were exempt from PEs because they were for "government or quasi-governmental agency" procurements. However, based on our review of PASSPort and FMS

⁷ MOCS provided us with a PASSPort Performance Evaluations Canceled because Exempt from Evaluation report which included 27 HRA contracts that MOCS exempted from PEs for evaluation periods between September 30, 2012 and November 1, 2019. Based on our review of those 27 contracts, MOCS improperly approved PE exemptions for six HRA contracts between November 26, 2018 and November 27, 2019. The six contracts and PE exemption periods are as follows: NTT Data Inc., CT1-069-20201407761, for the evaluation period November 1, 2018 to October 31, 2019; Idemia Identity & Security USA LLC; CT1-069-20191418500 for the evaluation period August 7, 2018 to August 6, 2019; JPI Technology LLC, CT1-069-20191404689 for the evaluation period July 1, 2018 to June 30, 2019; Urban Resource Institute, CT1-069-20181405229 for the evaluation period November 1, 2017 to October 31, 2018; Housing Works Inc., CT1-069-20191407428 for the evaluation period July 1, 2017 to June 30, 2018; and Rider Realty Company, CT1-069-20171424887 for the evaluation period October 1, 2016 to October 1, 2017.

data, the three contracts were intergovernmental contracts. As previously stated, intergovernmental contracts are expressly required to be evaluated.

Additionally, HRA claimed that the two contracts were exempt from PEs because the vendors did not provide services during the evaluation period. However, based on our review of FMS data, HRA paid the two vendors for services performed during the evaluation period and, therefore, HRA should have completed PEs for the two contracts.

Finally, HRA claimed that one contract was for a lease and, therefore, not subject to the PPB Rules. However, the contract included construction services which are subject to PPB Rules.

HRA Response: "There are several finding details with which we disagree, as shown in the attached spreadsheet based on data supplied by MOCS...

iii. 43 contracts had no PEs created in PASSPort for legitimate reasons (...1 is a lease and therefore no PE is required)."

Auditor Comment: As previously mentioned, the above-mentioned contract included construction services which are subject to PPB Rules. On June 4, 2020, we informed HRA that "we identified one lease contract (Rider Realty CT1-069-20171424887) for which it appears that construction services were provided and should have been evaluated during our audit scope period. . . . Since construction services are subject to PPB Rules, we are including this lease in our population of contracts. If HRA believes that construction services were provide and subject to evaluation during our audit scope period, please provide us with documentation to support this."

To date, however, HRA did not provide us with documentation to show that construction services were not performed during our audit scope period. Accordingly, as previously stated, HRA should have completed a PE because the contract included construction services which are subject to PPB Rules.

HRA Did Not Adequately Monitor Staff to Ensure They Completed PEs

As previously stated, the HRA ACCO is responsible for organizing and supervising the procurement activity of subordinate agency staff in conjunction with the CCPO. Comptroller's Directive #1, Section 4.5 states,

A sound internal control system must be supported by ongoing activity monitoring occurring at various organizational levels and in the course of normal operations. Such monitoring should be performed continually and be ingrained throughout an agency's operations.

The HRA ACCO and ACCO staff informed us that HRA used the PASSPort Outstanding Performance Evaluations by Evaluator Report and an internal tracking spreadsheet to monitor whether PEs were completed. In addition, the HRA ACCO and ACCO staff informed us that MOCS emailed them to inform them of PE completion status and remind them to complete outstanding PEs as soon as possible. HRA ACCO staff informed us that they sent reminders to evaluators to complete PEs.

We requested that HRA provide us with documentation to show that HRA monitored PE completion and that it sent reminders to evaluators to complete PEs. In response, HRA provided us with an internal tracking spreadsheet which officials said was used to monitor completion of PEs. However, this tracking spreadsheet did not include 238 of the 589 contracts for which HRA was responsible for evaluating vendors' performance. In addition, HRA provided us with emails that it sent to staff. However, the emails were sent primarily for the purpose of identifying staff responsible for evaluating PEs (PE Managers) and not to remind PE Managers to complete outstanding PEs.

HRA Did Not Establish Policies and Procedures for PEs

Comptroller's Directive #1, Principles of Internal Controls, states,

Internal control activities help ensure that management's directives are carried out. They are, basically, the policies, procedures, techniques, and mechanisms used to enforce management's direction. They must be an integral part of an agency's planning, implementing, review and accountability for stewardship of its resources and are vital to its achieving the desired results. . . Internal controls should be documented in management administrative policies or operating manuals.

In its Calendar Year 2018 Comptroller's Directive #1 Checklist, HRA stated that it had formal written operating procedures and that it communicated procedures to appropriate agency staff except for supportive/affordable housing. However, HRA did not have written operating procedures for PEs including procedures for PE completion timeframes, and monitoring and follow-up activities.

RECOMMENDATIONS

HRA should:

1. Ensure that PEs are completed and finalized within 90 days of the contract anniversary dates;

HRA Response: "Disagree[.] There is no requirement in the Procurement Policy Board Rules to complete performance evaluation within 90 days of the contract anniversary date.

HRA Programs will continue to use 90 days as an aspirational target for completing Performance Evaluations."

Auditor Comment: As previously stated, MOCS is responsible for coordinating and overseeing the procurement activity of Mayoral agency staff. In that capacity, MOCS informed the HRA ACCO that "[t]raditionally, PEs are expected to be completed within 90 days of the anniversary of the contract start date (for length of contract)." Therefore, HRA should ensure that PEs are completed and finalized within 90 days of the contract anniversary date, in accordance with MOCS' guidance, so that HRA and other City agency procurement personnel can make fully informed contracting decisions concerning vendors.

 Review PASSPort data regularly to ensure that PASSPort creates PEs for all HRA contracts except for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits;

HRA Response: "We agree in principle that all PEs that are required to be completed should be created in PASSPort. ACCO will work with MOCS to establish an effective means to ensure all required PEs are created in PASSPort."

3. Request PE exemptions only for contracts that meet the PPB Rules' PE exemption criteria and contracts for which services or goods were not provided during the evaluation period;

HRA Response: "Disagree[.] There are other instances where a performance evaluation would not be needed, as listed below:

- Lease contracts
- Contract for government or quasi-governmental agency
- The period to be evaluated is less than six months
- No work/service was done under the contract during the period
- The contract is a master contract and evaluations are being done on the task orders, or vice versa
- The contract passes funds through to another governmental entity
- The contractor's performance was evaluated under a different contract
- The contract has been terminated and final evaluation was completed

- Confidential contracts
- Contract Determined by Government Mandate....

The updated SOP (Recommendation 5, below) includes clear exemption criteria."

Auditor Comment: Although HRA asserted that "[t]here are other instances where a performance evaluation would not be needed," the PPB Rules do not provide for several of the exemptions HRA mentions in its response, and HRA did not provide a legal or authoritative basis for such exemptions.

Insofar as HRA relies on §1-02(f) of the PPB Rules in determining that certain transactions are exempt from PE requirements, it should also ensure that it complies with that rule's stipulation, "provided the ACCO determines that the process to be followed is in the best interest of the City and states the basis therefor." In sum, HRA should comply with the PPB Rules by requesting PE exemptions only for contracts that meet the PPB Rules' express exemption criteria, and it should maintain records of the ACCO's determinations where the rules require such determinations.

 Ensure that the ACCO and ACCO staff monitor PE completion status on an ongoing basis and periodically send written reminders to staff to complete PEs before their due dates; and

HRA Response: "Agree[.] Staff already monitor performance evaluation completion from program areas. Individual evaluators are sent reminder emails when performance evaluations are due, and ACCO staff monitors progress using a tracking tool. Regular reminders are sent to program staff."

Auditor Comment: As detailed above, HRA did not adequately monitor PE completion status and regularly send written reminders to staff to complete PEs before their due dates. For the audit scope period, HRA provided us with emails that were sent primarily for the purpose of identifying staff responsible for evaluating PEs (PE Managers) and not to remind PE Managers to complete outstanding PEs. Therefore, we reiterate that HRA should ensure that the ACCO and ACCO staff monitor PE completion status on an ongoing basis and periodically send written reminders to staff to complete PEs before their due dates.

5. Develop written policies and procedures, communicate them to staff, and train staff on their responsibilities for completing PEs including, but not limited to, completion timeframes, and monitoring and follow-up activities.

HRA Response: "Agree[.] DSS already has a standard operating procedure for completing performance evaluations which is in the process of being updated.

HRA program staff will receive comprehensive training on the use of PASSPort to complete and track the status of performance evaluations that are due."

Auditor Comment: During the course of the audit, HRA did not provide us with written operating procedures for PEs that included PE completion timeframes and procedures for monitoring PE completion and follow-up activities. Therefore, we reiterate that HRA should develop written policies and procedures, communicate them to staff, and train staff on their responsibilities for completing PEs.

DETAILED SCOPE AND METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93 of the New York City Charter.

This audit covered PEs generated in Fiscal Year 2018 (July 1, 2017 to June 30, 2018) which evaluated vendor performance from the prior year.

To obtain an understanding of the rules and regulations governing HRA's documentation and evaluation of vendor performance, we obtained and reviewed as criteria the PPB Rules, the New York City Charter Chapter 13: Procurement, a MOCS memorandum dated March 19, 2015 regarding Intergovernmental Procurement Procedures, and Comptroller's Directive #1, *Principles of Internal Controls* and *Financial Integrity Statement Checklist*.

To obtain an understanding of HRA's operating procedures and controls, we met with the ACCO, First Deputy ACCO, and two Deputy ACCOs. We also documented our interviews in memoranda. We reviewed HRA Directive #1's Agency Evaluation of Internal Controls Checklists for Calendar Years 2017 and 2018.

To obtain an understanding of PASSPort, we reviewed PASSPort training manuals and we conducted a walkthrough with MOCS officials and documented our discussion in memoranda.

To identify active HRA contracts for Fiscal Year 2017, we extracted the Agreements Franchises Concessions report from the City's Financial Management System (FMS). The extracted report included HRA contracts between July 1, 1900 and June 11, 2019. We selected active contracts in Fiscal Year 2017 by removing those contracts with an end date prior to July 1, 2016 and a start date after June 30, 2017 from the report. We also removed contracts that met the PPB Rules' PE exemption criteria.

To determine whether HRA completed PEs for all contracts for Fiscal Year 2018, we compared the population of Fiscal Year 2017 active contracts extracted from FMS against the Performance Evaluation by Agency report provided by MOCS.

We also obtained a PASSPort Performance Evaluations Canceled because Exempt from Evaluation report which included 27 HRA contracts that MOCS exempted from PEs for evaluation periods between September 30, 2012 and November 1, 2019. For each of the 27 contracts, we reviewed the FMS Agreement, Franchise, and Concession Report, the FMS Expense Accounting Detail Listing Payment Request Report, and the FMS Expense Accounting Detail Listing Disbursements Report to determine whether contracts met the PPB Rules' PE exemption criteria and whether goods or services were provided during the evaluation period.

To determine whether HRA finalized PEs in a timely manner, we calculated the number of days between the contract anniversary date and the evaluation completion date. We considered a PE to be timely if it was completed within 90 days.

We also requested documentation to show that HRA monitored PE completion and that it sent reminders to evaluators to complete PEs. We determined whether an HRA internal tracking spreadsheet included all the contracts for which HRA was responsible for evaluating vendors' performance. We also reviewed HRA emails to determine whether they were sent to staff responsible for completing PEs and reminded them to complete outstanding PEs.



Human Resources Administration

Department of Homeless Services

Steven Banks Commissioner

Molly Murphy DSS First Deputy Commissioner

Saratu Grace Ghartey Chief Program Accountability Officer

151 West Broadway New York, NY 10013

212 274 5600

June 25, 2020

Ms. Marjorie Landa Office of the City Comptroller 1 Centre Street, Room 1100 New York, NY 10007

Re: Agency Response to the Draft Audit Report on the Human Resources Administration's Vendor Performance Evaluations FK19-092A

Dear Ms. Landa,

Thank you for sharing the draft report for the New York City Comptroller audit of NYC's Human Resources Administration's Vendor Performance Evaluations FK19-092A

Please find enclosed our agency response in the form of a Corrective Action Plan which identifies the actions already taken, as well as actions that will be taken, to address the recommendations in the report. While the agency does not agree with all of the report's recommendations, we agree that further monitoring and training of staff are needed.

That notwithstanding, there are a number of issues we would like to bring to your attention, and we ask that you consider these before issuing the final report:

- 1) The draft report asserts that Performance Evaluations (PEs) must be completed and finalized within 90 days of the contract anniversary date; however, there is no requirement in the Procurement Policy Board (PPB) Rules that PEs must be completed within this timeframe;
- 2) PE exemptions are not only for contracts for goods procured by competitive sealed bids based on best value and for contracts below small purchase limits. Exemptions are also requested for items such as leases, purchases not subject to PPB Rules, and contracts where work was not performed in that contract year (see the complete list in the attached CAP); and
- 3) There are several finding details with which we disagree, as shown in the attached spreadsheet based on data supplied by MOCS, and we ask that the Audit Report be revised to reflect these facts:
 - i. 19 more PEs were completed than reported;
 - ii. 3 more PEs were created than reported by NYCC; and

ADDENDUM I Page 1 of 2 W-2-545 Rev. 04/19 43 contracts had no PEs created in PASSPort for legitimate reasons (42 because they remained in Vendex and 1 is a lease and therefore no PE is required).

The details are attached as Exhibit A.

It is also worth noting that the period reviewed by the auditors was the very first year that PEs were due in PASSPort. We expect that as the system continues to improve and staff become more familiar with its functions, error rates will progressively improve.

The agency remains committed to its mission of serving New York City's most vulnerable population in the most efficient and effective manner, while adhering to all applicable rules, regulations and laws by which we are bound. We would like to express our sincere appreciation for the efforts that your office has invested in this audit to assist us in achieving our goals.

We are confident that our progress and our response to this audit demonstrate the agency's commitment to continually improving our operations. Should you have any questions regarding the enclosed, please contact Sonia Lamrhari, Director of the DSS Bureau of Audit Coordination at 929-221-5724.

Thank you for your consideration.

Yours sincerely,

Maura Hayes-Chaffe Assistant Deputy Commissioner, Audit Services

Enclosures

1

NYC DEPARTMENT OF SOCIAL SERVICES OFFICE OF AUDIT SERVICES CORRECTIVE ACTION PLAN

Audit Name: Audit on the Human Resources Administration Vendor Performance Evaluations-Draft Report Audit Number: FK19-092A

Date:	June	25.	2020
Date	June	<i></i> ,	

Auditor's Recommendations	Agency Response	Responsible Unit	Corrective Action	Target Date
Recommendation 1:	Disagree			
Ensure that PEs are completed and finalized within 90 days of the contract anniversary dates.	There is no requirement in the Procurement Policy Board Rules to complete performance evaluation within 90 days of the contract anniversary date.	ACCO	None	
	HRA Programs will continue to use 90 days as an aspirational target for completing Performance Evaluations.	HRA Program	None/Ongoing	
Recommendation 2:	Agree	ACCO		
Review PASSPort data regularly to ensure that PASSPort creates PEs for all HRA contracts except for procurements of goods by competitive sealed bid other than sealed bids awarded based on best value and procurements below the small purchase limits.	We agree in principle that all PEs that are required to be completed should be created in PASSPort.		ACCO will work with MOCS to establish an effective means to ensure all required PEs are created in PASSPort.	September 2020
Recommendation 3:	Disagree	ACCO		
Request PE exemptions only for contracts that meet the PPB Rules PE exemption criteria and	There are other instances where a performance evaluation would not be needed, as listed below:Lease contracts		The updated SOP (Recommendation 5, below) includes clear exemption criteria.	Completed

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NYC DEPARTMENT OF SOCIAL SERVICES OFFICE OF AUDIT SERVICES CORRECTIVE ACTION PLAN

Audit Name: Audit on the Human Resources Administration Vendor Performance Evaluations-Draft Report Audit Number: FK19-092A

Date: June 25, 2020

contracts for which services or goods were not provided during the evaluation period.	 Contract for government or quasi-governmental agency The period to be evaluated is less than six months No work/service was done under the contract during the period The contract is a master contract and evaluations are being done on the task orders, or vice versa The contract passes funds through to another governmental entity The contractor's performance was evaluated under a different contract The contract has been terminated and final evaluation was completed Confidential contracts Contract Determined by Government Mandate 			
Recommendation 4: Ensure that the ACCO and ACCO staff monitor PE completion status on an ongoing basis and periodically send written reminders to staff to complete PEs before their due dates.	Agree Staff already monitor performance evaluation completion from program areas. Individual evaluators are sent reminder emails when performance evaluations are due, and ACCO staff monitors progress using a tracking tool. Regular reminders are sent to program staff.	ACCO	Continue to monitor the status of performance evaluations that are due.	Ongoing

3

NYC DEPARTMENT OF SOCIAL SERVICES OFFICE OF AUDIT SERVICES CORRECTIVE ACTION PLAN

Audit Name: Audit on the Human Resources Administration Vendor Performance Evaluations-Draft Report Audit Number: FK19-092A

Recommendation 5:	Agree			
Develop written policies and procedures, communicate them to staff, and train staff on their responsibilities for completing PEs including, but not limited to, completion	DSS already has a standard operating procedure for completing performance evaluations which is in the process of being updated.	ACCO	Updated SOP	Completed
timeframes, and monitoring and follow-up activities.	HRA program staff will receive comprehensive training on the use of PASSPort to complete and track the status of performance evaluations that are due.	HRA Program	Provide PASSPort training to staff responsible for completing evaluations and for tracking progress.	October 2020

Date: June 25, 2020

# Doc	Code Doc Dept Code	Doc ID	VendorLegalName	ContractID	VendorLegalName	NYCC Reason	FY2017 PE Status per MOCS
1 CT/			HERMAN MILLER INC.	CTA1-096-20177211942	HERMAN MILLER INC.	PE Not Completed Not Created	FY17 remained in Vendex
2 CT/			HERMAN MILLER INC.	CTA1-096-20177211941	HERMAN MILLER INC.	PE Not Completed Not Created	FY17 remained in Vendex
3 CT/			THE URBAN INSTITUTE	CTA1-069-20187202102	THE URBAN INSTITUTE	PE Not Completed Not Created	FY17 remained in Vendex
6 CT/			WESTAT, INC	CTA1-069-20177210951	WESTAT, INC	PE Not Completed Not Created	FY17 remained in Vendex
7 CT/		20177209003		CTA1-069-20177209003	KPMG LLP	PE Not Completed Not Created	FY17 remained in Vendex
8 CT/	A1 069	20177208419	HERMAN MILLER INC.	CTA1-069-20177208419	HERMAN MILLER INC.	PE Not Completed Not Created	FY17 remained in Vendex
10 CT/	A1 069	20177203706	GARTNER INC	CTA1-069-20177203706	GARTNER INC	PE Not Completed Not Created	FY17 remained in Vendex
14 CT/	A1 069	20157202221	LANGUAGE LINE SERVICES, INC.	CTA1-069-20157202221	LANGUAGE LINE SERVICES, INC.	PE Not Completed Not Created	FY17 remained in Vendex
15 CT/	A1 069	20157202206	GENEVA WORLDWIDE, INC.	CTA1-069-20157202206	GENEVA WORLDWIDE, INC.	PE Not Completed Not Created	FY17 remained in Vendex
21 CT1	069	20151424967	SILICON ALLEY GROUP INC	CT1-096-20151424967	SILICON ALLEY GROUP INC	PE Not Completed Not Created	FY17 remained in Vendex
22 CT1	069	20151408449	CNC CONSULTING INC	CT1-096-20151408449	CNC CONSULTING INC	PE Not Completed Not Created	FY17 remained in Vendex
23 CT1	069	20151407970	INFOPEOPLE CORPORATION	CT1-096-20151407970	INFOPEOPLE CORPORATION	PE Not Completed Not Created	FY17 remained in Vendex
26 CT1		20181420181	IMMIGRANT JUSTICE CORPS INC	CT1-069-20181420181	IMMIGRANT JUSTICE CORPS INC	PE Not Completed Not Created	FY17 remained in Vendex
27 CT1	069	20140001726	TURNING POINT BROOKLYN INC	CT1-069-20140001726	TURNING POINT BROOKLYN INC	PE Not Completed Not Created	FY17 remained in Vendex
28 CT1		20181415878		CT1-069-20181415878	Safe Passage Project Corporation	PE Not Completed Not Created	FY17 remained in Vendex
29 CT1			JEWISH BOARD OF FAMILY AND CH		JEWISH BOARD OF FAMILY AND C	•	FY17 remained in Vendex
30 CT1		20131414585		CT1-069-20131414585	MDRC	PE Not Completed Not Created	FY17 remained in Vendex
32 CT1			RICHARD L HOFFMAN & ASSOC INC		RICHARD L HOFFMAN & ASSOC IN		FY17 remained in Vendex
36 CT1		20141400245		CT1-069-20141400245	FCN, INC.	PE Not Completed Not Created	FY17 remained in Vendex
38 CT1			EMMIS OPERATING COMPANY	CT1-069-20171404037	EMMIS OPERATING COMPANY	PE Not Completed Not Created	FY17 remained in Vendex
40 CT1			NTT DATA INC.	CT1-069-20141413445	NTT DATA INC.	PE Not Completed Not Created	FY17 remained in Vendex
41 CT1			ALLAN S. JOSEPH, CPA	CT1-069-20141415346	ALLAN S. JOSEPH, CPA	PE Not Completed Not Created	FY17 remained in Vendex
43 CT1			SCO FAMILY OF SERVICES	CT1-069-20161418108	SCO FAMILY OF SERVICES	PE Not Completed Not Created	FY17 remained in Vendex
48 CT1			SAMARITAN DAYTOP VILLAGE INC	CT1-069-20161415212	SAMARITAN DAYTOP VILLAGE INC	•	FY17 remained in Vendex
50 CT1			URBAN RESOURCE INSTITUTE	CT1-069-20161410936	URBAN RESOURCE INSTITUTE	PE Not Completed Not Created	FY17 remained in Vendex
60 CT1		20161419621			RISEBORO COMMUNITY PARTNER	•	FY17 remained in Vendex
61 CT1			BRONXWORKS INC	CT1-069-20161420973	BRONXWORKS INC	PE Not Completed Not Created	FY17 remained in Vendex
71 CT1			COMPUTER TASK GROUP INC.	CT1-069-20151412903	COMPUTER TASK GROUP INC.	PE Not Completed Not Created	FY17 remained in Vendex
72 CT1		20151412409		CT1-069-20151412409	QED INC	PE Not Completed Not Created	FY17 remained in Vendex
73 CT1			CGI FEDERAL INC	CT1-069-20151411251	CGI FEDERAL INC	PE Not Completed Not Created	FY17 remained in Vendex
88 CT/			VEOLIA ENVIRONMENTAL SERVICE		VEOLIA ENVIRONMENTAL SERVIC		FY17 remained in Vendex
94 CT1			SYSUSA. INC	CT1-096-20171409122	SYSUSA. INC	PE Not Completed Not Created	FY17 remained in Vendex
114 CT1			ACACIA NETWORK HOUSING INC	CT1-069-20181423375	ACACIA NETWORK HOUSING INC		FY17 remained in Vendex
126 CT1			NEW YORK FOUNDATION FOR SEN		NEW YORK FOUNDATION FOR SEI		FY17 remained in Vendex
127 CT1			NEW YORK FOUNDATION FOR SEN		NEW YORK FOUNDATION FOR SEI		FY17 remained in Vendex
133 CT1		20171427841			BROOKLYN DEFENDER SERVICES	•	FY17 remained in Vendex
134 CT1			ALLEN WOMEN'S RESOURCE CENT		ALLEN WOMEN'S RESOURCE CEN		FY17 remained in Vendex
155 CT1			AFRICAN AMERICAN PLANNING CO		AFRICAN AMERICAN PLANNING CO	•	FY17 remained in Vendex
158 CT1			P & M ELECTRICAL CONTRACTING		P & M ELECTRICAL CONTRACTING		FY17 remained in Vendex
165 CT1			NATIONWIDE COURT SERVICES, IN		NATIONWIDE COURT SERVICES, I		FY17 remained in Vendex
166 CT1		20141415243		CT1-069-20141415243	BCA WATSON RICE LLP	PE Not Completed Not Created	FY17 remained in Vendex
139 CT1			RIDER REALTY CO C/O I LEIBEL	CT1-069-20171424887	RIDER REALTY CO C/O I LEIBEL	PE Not Completed Improprer Exemption	Leases; exemption proper
4 CTA		20187201682		CTA1-069-20187201682	MDRC	PE Not Completed Not Created	FY 2017 PE Exists with Status of Draft
159 CT1			PRESENTATION PRODUCTS INC	CT1-069-20171403556	PRESENTATION PRODUCTS INC	PE Not Completed Not Created	FY 2017 PE Exists with Status of Draft
186 CT1	069	20151413936	Alert Process Service LLC	CT1-069-20151413936	Alert Process Service LLC	PE Not Completed Not Created	FY 2017 PE Exists with Status of In Progress

	Doc Dept Code	Doc ID VendorLegalName	ContractID	VendorLegalName	NYCC Reason	FY2017 Status per MOCS
26 CT1	069	20181401337 ARBOR E&T LLC	CT1-069-20181401337	ARBOR E&T LLC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
27 CT1	069	20171427740 EDUCATIONAL DATA SYSTEMS INC	CT1-069-20171427740	EDUCATIONAL DATA SYSTEMS INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
30 CT1	069	20171424137 EAST RIVER DEVELOPMENT ALLIANCE, INC.	CT1-069-20171424137	EAST RIVER DEVELOPMENT ALLIANCE, INC.	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
33 CT1	069	20171422204 GOODWILL INDUSTRIES OF GREATER NY & NORTHERN NEW JERSEY I	INCCT1-069-20171422204	GOODWILL INDUSTRIES OF GREATER NY & NORTHERN NEW JERSEY INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
34 CT1	069	20171422192 GOODWILL INDUSTRIES OF GREATER NY & NORTHERN NEW JERSEY I	INCCT1-069-20171422192	GOODWILL INDUSTRIES OF GREATER NY & NORTHERN NEW JERSEY INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
35 CT1	069	20171422141 NATIONAL ASSOCIATION ON DRUG ABUSE PROBLEMS (NYS) INC	CT1-069-20171422141	NATIONAL ASSOCIATION ON DRUG ABUSE PROBLEMS (NYS) INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
37 CT1	069	20171421186 FEDCAP REHABILITATION SERVICES INC	CT1-069-20171421186	FEDCAP REHABILITATION SERVICES INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
41 CT1	069	20171421137 AMERICA WORKS OF NEW YORK INC	CT1-069-20171421137	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
45 CT1	069	20171421062 AMERICA WORKS OF NEW YORK INC	CT1-069-20171421062	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
47 CT1	069	20171420868 GOODWILL INDUSTRIES OF GREATER NY & NORTHERN NEW JERSEY I	INCCT1-069-20171420868	GOODWILL INDUSTRIES OF GREATER NY & NORTHERN NEW JERSEY INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
58 CT1	069	20171423646 HELP SOCIAL SERVICE CORPORATION	CT1-069-20171423646	HELP SOCIAL SERVICE CORPORATION	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
86 CT1	069	20171422024 AMERICA WORKS OF NEW YORK INC	CT1-069-20171422024	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
91 CT1	069	20171421182 FEDCAP REHABILITATION SERVICES INC	CT1-069-20171421182	FEDCAP REHABILITATION SERVICES INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
92 CT1	069	20171421181 AMERICA WORKS OF NEW YORK INC	CT1-069-20171421181	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
93 CT1	069	20171421018 AMERICA WORKS OF NEW YORK INC	CT1-069-20171421018	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
95 CT1	069	20171420926 AMERICA WORKS OF NEW YORK INC	CT1-069-20171420926	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
96 CT1	069	20171420911 FEDCAP REHABILITATION SERVICES INC	CT1-069-20171420911	FEDCAP REHABILITATION SERVICES INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
97 CT1	069	20171420531 AMERICA WORKS OF NEW YORK INC	CT1-069-20171420531	AMERICA WORKS OF NEW YORK INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed
125 CT1	069	20151423395 NEW YORK CITY GAY AND LESBIAN ANTI-VIOLENCE PROJECT INC	CT1-069-20151423395	NEW YORK CITY GAY AND LESBIAN ANTI-VIOLENCE PROJECT INC	PE Not Completed PE Created	FY 2017 PE Exists with Status of Closed