



City of New York

OFFICE OF THE COMPTROLLER

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FINANCIAL AUDIT

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Deputy Comptroller for Audit

Audit Report on the Department for the
Aging's Monitoring of Senior Centers

FM13-056A

August 2, 2013

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK
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NEW YORK, N.Y. 10007-2341

John C. Liu
COMPTROLLER

August 2, 2013

To the Residents of the City of New York:

My office has audited the New York City Department for the Aging's (DFTA) monitoring of senior center facilities to ensure that centers are being maintained in a safe and sanitary condition. Audits such as this provide a means of ensuring that organizations under contract with the City comply with their contracts and are adequately monitored by City oversight agencies.

Based on the conditions observed during our inspection of 63 senior centers and a review of DFTA and Department of Health and Mental Health (DOHMH) inspection reports, we believe DFTA's monitoring of senior centers could be enhanced to better ensure that senior centers are being maintained in a safe and clean condition. Specifically, 43 of the 63 centers visited had issues of non-compliance with DFTA standards including obstructed exits, inadequate lighting in hallways and stairways, and sanitary concerns in the bathrooms and kitchen areas. Eighteen of these 43 centers had recurring issues over multiple years, and six of these 18 had issues in more than one area.

DFTA is required to monitor, on a regular basis, the sanitary and safety conditions of affiliated senior citizen centers. To meet this objective, DFTA has established an annual cycle of inspection procedures to evaluate each center's compliance with programmatic and nutritional criteria. These procedures include on-site inspections, follow-up inspections if necessary, and review of DOHMH inspection reports. Such a level of monitoring, if properly implemented, would seem to be sufficient to ensure a safe and sanitary senior citizen center environment. However, the results of our unannounced visits to 63 centers supplemented by our review of DFTA's annual monitoring reports and DOHMH inspection reports for these same centers disclosed that certain specific common compliance issues repeatedly occur at many of these centers.

The audit makes several recommendations including that DFTA inspect the centers cited in the report to ensure that the problems have been corrected; enhance its monitoring and oversight of senior centers; and establish a system that tracks recurring problems at each center.

The results of the audit have been discussed with DFTA officials, and their comments have been considered in preparing this report. DFTA'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,

A handwritten signature in black ink, appearing to read "JCL", written over the printed name "John C. Liu".

John C. Liu

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THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER FINANCIAL AUDIT

Audit Report on the Department for the Aging's Monitoring of Senior Centers

FM13-056A

AUDIT REPORT IN BRIEF

The New York City Department for the Aging (DFTA) plans, administers, and coordinates the provision of services that assist many of the City's 1.4 million senior citizens in participating in their communities and maintaining their independence. DFTA receives federal, state, and city funds to provide services for senior citizens. DFTA provides these services directly as well as through contracts with community-based organizations throughout the five boroughs. The services include hot meals and activities at senior centers, home care, home-delivered meals, case management, and transportation. According to DFTA's website, there were 258 DFTA-affiliated senior centers located throughout the five boroughs as of August 6, 2012.

DFTA manages contracts with community-based organizations and is responsible for ensuring service quality at the senior centers. As part of its oversight, DFTA's Bureau of Community Services (BCS) unit conducts formal assessment surveys of each senior center through inspections by program officers and nutritionists. The survey evaluates the center's social and nutritional programs as well as the maintenance of the center.

Audit Findings and Conclusion

Based on the conditions observed during our inspection of 63 senior centers and a review of DFTA and Department of Health and Mental Hygiene (DOHMH) inspection reports, we believe DFTA's monitoring of senior centers could be enhanced to better ensure that senior centers are being maintained in a safe and clean condition. Specifically, 43 of the 63 centers visited had issues of non-compliance with DFTA standards including obstructed exits, inadequate lighting in hallways and stairways, and sanitary concerns in the bathrooms and kitchen areas. Eighteen of these 43 centers had recurring issues over multiple years, and six of these 18 had issues in more than one area. Senior center personnel accompanied us on our visits and were made aware of the conditions that were found.

Audit Recommendations

This report makes a total of five recommendations. DFTA should:

- Inspect the centers cited in the report to ensure that the problems have been corrected and have not recurred.
- Enhance its monitoring and oversight of senior centers by revising its inspection procedures to ensure that:
 - Supervisor approval is documented in the inspection files when conditions identified during an inspection are resolved upon submission of reliable documentation.
 - Prior to contract negotiation, DFTA should conduct an inspection identifying all conditions that need to be corrected. A punch-list of conditions should be discussed and given to center sponsors at the completion of the inspection with an established timeframe for corrective action. Prior to lease signing, a thorough follow-up inspection should be conducted to ensure that all conditions have been corrected.
- Establish a system that tracks recurring problems at each center. Recurring problems need to be corrected before renewing contracts. Serious safety and sanitary conditions should be corrected before signing the contract.
- Ensure that centers contact the responsible City agency (Department of Buildings, Fire Department, or New York City Housing Authority) to obtain the required Place-of-Assembly permits and required fire inspections.
- Revise its procedures to ensure that inspectors review and document whether specific violations cited on DOHMH inspection reports were corrected.

Agency Response

In their response, DFTA officials agreed with the report's findings and conclusions. DFTA officials stated that though they believe that protocols are in place to monitor and track the conditions of senior center facilities, this audit does demonstrate the need for more accountability from senior center programs so that older New Yorkers can receive services in a clean and safe environment. While not responding directly to our specific recommendations, DFTA officials further stated that many of the specific conditions cited in our report have already been or are in the process of being corrected. Further, DFTA officials stated that they will be adopting new policies to hold senior center programs more accountable. We commend DFTA for initiating prompt action in response to our report. The specific details of the above are included in DFTA's response, which is attached as an addendum to this report.

INTRODUCTION

Background

DFTA plans, administers, and coordinates the provision of services that assist many of the City's 1.4 million senior citizens in participating in their communities and maintaining their independence. DFTA receives federal, state, and city funds to provide services for senior citizens. DFTA provides these services directly as well as through contracts with community-based organizations throughout the five boroughs. The services include hot meals and activities at senior centers, home care, home-delivered meals, case management, and transportation. According to DFTA's website, there were 258 DFTA-affiliated senior centers located throughout the five boroughs as of August 6, 2012.

DFTA manages contracts with community-based organizations and is responsible for ensuring service quality at the senior centers. As part of its oversight, DFTA's BCS unit conducts formal assessment surveys of each senior center through inspections by program officers and nutritionists. The survey evaluates the center's social and nutritional programs as well as the maintenance of the center. During Fiscal Year 2012, program officers and nutritionists were required to perform announced (pre-arranged) visits and unannounced (unscheduled) visits to each center. Should conditions be cited that require corrective action, the program officer or nutritionist may schedule a follow-up visit to confirm that the condition(s) has/have been rectified. Alternatively, for less serious conditions, the center may submit documentation to DFTA that the condition(s) has/have been addressed. In addition to DFTA inspections, the DOHMH conducts sanitary inspections of each center.

Objectives

The objective of this audit was to determine whether DFTA properly monitors the senior centers to ensure that sponsors are maintaining senior centers in a safe and clean condition in accordance with contract terms and DFTA procedures.

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.

The scope of this audit covers the period from July 1, 2011, through August 21, 2012, the date of our last visit to the senior centers. We also reviewed DFTA case files going back to July 1, 2009, to determine whether the physical conditions observed during our scope period existed for an extended prior period.

Discussion of Audit Results

The matters covered in this report were discussed with DFTA officials during and at the conclusion of this audit. A preliminary draft report was sent to DFTA officials and discussed at an exit conference held on May 17, 2013. On May 24, 2013, we submitted a draft report to DFTA officials with a request for comments. We received a written response from DFTA officials on June 10, 2013.

In their response, DFTA officials agreed with the report's findings and conclusions. DFTA officials stated that though they believe that protocols are in place to monitor and track the conditions of senior center facilities, this audit does demonstrate the need for more accountability from senior center programs so that older New Yorkers can receive services in a clean and safe environment. While not responding directly to our specific recommendations, DFTA officials further stated that many of the specific conditions cited in our report have already been or are in the process of being corrected. Further, DFTA officials stated that they will be adopting new policies to hold senior center programs more accountable. We commend DFTA for initiating prompt action in response to our report. The specific details of the above are included in DFTA's response, which is attached as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

Based on the conditions observed during our inspection of 63 senior centers and a review of DFTA and DOHMH inspection reports, we believe DFTA's monitoring of senior centers could be enhanced to better ensure that senior centers are being maintained in a safe and clean condition. Specifically, 43 of the 63 centers visited had issues of non-compliance with DFTA standards including obstructed exits, inadequate lighting in hallways and stairways, and sanitary concerns in the bathrooms and kitchen areas. Eighteen of these 43 centers had recurring issues over multiple years, and six of these 18 had issues in more than one area. Senior center personnel accompanied us on our visits and were made aware of the conditions that were found.

DFTA is required to monitor, on a regular basis, the sanitary and safety conditions of affiliated senior citizen centers. To meet this objective, DFTA has established an annual cycle of inspection procedures to evaluate each center's compliance with programmatic and nutritional criteria. These procedures include on-site inspections, follow-up inspections if necessary, and review of DOHMH inspection reports. Such a level of monitoring, if properly implemented, would seem to be sufficient to ensure a safe and sanitary senior citizen center environment. However, the results of our unannounced visits to 63 centers (see Appendix I) supplemented by our review of DFTA's annual monitoring reports and DOHMH inspection reports for these same centers disclosed that certain specific common compliance issues repeatedly occur at many of these centers.

Although DFTA performs the required on-site annual initial performance assessment and on-site initial nutritional assessment, we found that in many instances, there was no evidence in the center files that on-site follow-up inspections were done. In accordance with DFTA's procedures, the follow-up inspection requirement can be met by sending a fax to the assessment officer, whereby the sponsor attests that the conditions were either corrected or a request is made for the issue to be resolved. Furthermore, the unannounced visit is frequently done at the same time as the announced follow-up inspection (when an on-site follow-up visit is done), thereby significantly minimizing the potential effectiveness of an unannounced inspection.

During our unannounced visits performed between August 14, 2012, and August 21, 2012, we found safety concerns relating to locked or blocked exit doors, exit signs not illuminated, and hallways and stairways that were not adequately lit. Any of these issues could result in harm to seniors if an emergency were to occur. For example, the exit door was obstructed by several garbage cans and boxes at one center that serves breakfast and lunch daily to an average of 230 seniors. Similarly, 19 centers visited did not have a current place of assembly permit from the Buildings Department and/or an annual fire inspection certificate from the Fire Department.¹

We also found senior centers that had expired inspection tags on fire extinguishers. Other fire safety issues we found include lack of evidence that fire evacuation drills were held and the center's evacuation plan, which should be posted, being either illegible or not posted for the seniors to review. These conditions effectively negated the beneficial effect of having properly maintained equipment or plans in times of an emergency.

¹ A Place of Assembly permit issued by the Department of Buildings documents the maximum number of persons that should be allowed in a room at one time in order to promote fire safety and avoid a fire hazard.

During our unannounced senior citizen center observations, we also observed a varying degree of vermin infestation at 15 centers ranging from live roaches to rodent droppings to glue mats containing dead roaches. These sightings were not relegated to just the kitchen and food storage areas within the center. During its inspections of senior centers, DOHMH also identified pest activity or conditions conducive to an infestation, such as gaps or holes on the wall where it meets the floor.

Our observations also identified concerns relating to the cleanliness and maintenance of senior citizen center facilities. Unsanitary and inadequately maintained bathrooms were noted at 18 centers, with conditions ranging from stuffed or flooded toilets or urinals to dirty or rusty bathroom fixtures including missing floor and ceiling tiles. In the kitchen/food preparation area, we observed dirty stoves, flies, and improperly maintained or stored food, including expired canned food.

There were also 24 centers that had general maintenance issues pertaining to problems with the center's flooring, missing or stained ceiling tiles, holes in the wall, and peeling paint or plaster.

Fire and Personal Safety Problems and Concerns

There were fire and personal safety problems at many of the centers that we visited. These problems related to exits and passageways, place-of-assembly permits, fire inspections, and fire extinguishers.

Obstructed Exits and Passageways Pose Threat to Seniors' Safety

During our visits to the senior centers, we observed problems at 14 of the centers that may pose threats to the seniors' safety and ability to exit in case of an emergency. The problems noted include blocked or locked exits, exit signs that were not illuminated, and inadequate lighting in hallways and stairways.

Five centers had exit doors that were blocked and obstructed. One other center had locked exit doors. Such conditions could pose a threat to the safety of the seniors while in the center facility. In the event of an emergency, it would be dangerous for seniors to have to wait to exit the facility because obstacles are blocking emergency doors. DFTA's Performance Standards for Contracted Services require that exits are unobstructed and be easily opened at all times when the building is in use. In the event of an emergency, when it could be crucial for seniors to exit the center in an expeditious manner, it would be dangerous to have any obstacles that would limit free movement through designated exits and passageways. For example, the Korean American Senior Center had an exit door that was obstructed with what appeared to be garbage. **(See Photograph Number 1 in Appendix II.)** This center serves breakfast and lunch to an average of 230 senior citizens on a daily basis. Although the center has more than one exit, it is important that no exits are locked or obstructed during the hours of operation.

Although all of the centers we visited had at least two exits in accordance with DFTA's Performance Standards, seven of the centers had exit signs that were not illuminated. This, too, can pose a threat to the safety of seniors while in the center facility. In the event of an emergency, clearly visible and illuminated exit signs are crucial so that seniors and staff at the centers can identify their location and exit. DFTA's Performance Standards require that exit doors have working exit lights to identify their location.

Another potential barrier to seniors' safety that we identified at three centers is inadequate lighting in hallways and stairways. For example, during our visit to Rain Middletown Senior Center, attended by approximately 150 seniors daily, we found one of the lights was out in a long hallway. (See Photograph Number 2 in Appendix II) DFTA's Performance Standards require that stairs and passageways are well lighted. Inadequate lighting in hallways and stairways reduces visibility and can pose a serious safety hazard to seniors and staff alike. See Table I for a list of the 14 senior centers that had problems with exits and passage ways.

Table I

14 Senior Centers with Problems with Exits and Passageways

Senior Center Name	Locked Exits	Blocked Exits	Exit Signs Not Illuminated	Inadequate Lighting in Hallways or Stairways
Northeast Bronx		X		
Rain College Avenue			X	
Rain Middletown		X		X
Rain Nereid				X
William Hodson			X	
Senior Citizens League of Flatbush			X	
Willoughby	X		X	
Smith Houses		X		
University Settlement Nutrition			X	
JASA Roy Reuther			X	
Korean American Sr. Center of Flushing		X		
Cassidy Coles			X	
JCC South Shore		X		
West Brighton				X
TOTALS	1	5	7	3

Adherence to the above-mentioned safety concerns helps to ensure that the physical environment is safe. The conditions described above are dangerous for all individuals present at the center. In the event of an emergency, they are even more dangerous for seniors, many of whom may have special needs or may be dealing with physical aspects of aging such as reduced vision or mobility and thus require extra assistance. DFTA's Performance Standards require that the center facility is safe and that safety hazards are avoided. DFTA needs to ensure that maintaining unobstructed and unlocked exits, illuminated exit signs, and well-lit passageways at the centers is a top priority.

Lack of Valid Place-of-Assembly Permits and Fire Inspections

DFTA did not ensure that all of the senior centers it contracted with had a current place-of-assembly permit or annual fire inspection certificate. Of the 43 centers that we found had

issues of non-compliance with DFTA standards, 19 did not have valid place-of-assembly permits and two of the 19 centers also did not have valid FDNY inspection certificates.

A place-of-assembly permit is important because it documents the maximum number of persons who should be allowed in a room at one time in order to promote fire safety and avoid a fire hazard. The place-of-assembly permit and a fire inspection help to ensure that the premises where the senior citizens are served meet the standards and codes of the Buildings Department and Fire Department.

Centers capable of serving 75 or more seniors per room require a place-of-assembly permit issued by the Buildings Department based on an annual inspection by the Fire Department. For those centers that do not require an annual place-of-assembly permit, DFTA's Performance Standards require that the center request an annual fire inspection through FDNY. Regardless of the number of seniors served, an annual inspection is required for all senior centers.

Table II lists the centers that did not have valid place-of-assembly permits and fire inspections.

Table II

19 Senior Centers Lacking Valid Place-of-Assembly Permits and Fire Inspections

Senior Center Name	Centers That Lacked Evidence of Required Fire Inspection	Center That Lacked Required Place-of-Assembly
JASA Throgs Neck		X
JCC Southshore		X
Rain Middletown		X
New Lane		X
Boro Park		X
Hugh Gilroy		X
Haber		X
Willoughby		X
A.Phillip Randolph		X
Smith Houses	X	X
Stein		X
Elmhurst Jackson Heights		X
JASA Roy Reuther		X
JSPOA Rockaway Blvd.	X	X
Rochdale		X
Selfhelp Austin St.		X
Stapleton		X
Cassidy Coles		X
West Brighton		X
TOTALS	2	19

While we found that the place-of-assembly permit expired at 19 centers, we are further concerned that the place-of-assembly permits expired in 2008 at Haber Senior Center.

Fire Extinguishers (Ventilation and Fire Protection Systems)

Fire extinguishers are an important part of the fire safety measures in a senior center. The main purpose of fire extinguishers is to help people make their way out of a burning building. They can also be used by trained individuals to extinguish a small fire. As part of fire preparedness, fire extinguishers are required to be inspected annually. DFTA's Performance Standards for senior centers require that fire extinguishers are inspected, tested, and tagged with a current inspection date. Although we found that there were fire extinguishers at all of the centers we visited, there were four centers where we found that the fire extinguishers were expired or the inspection tags were in a condition, such as torn in half, and we were unable to determine the last inspection date. For example, at Sunnyside Community Senior Center, all of the extinguishers expired in March 2012, five months before our August 17, 2012, visit. Because fire extinguishers can provide a line of defense for seniors in the event of a fire, it is important that fire extinguishers have a current inspection to help ensure they are safe to operate and can operate correctly during an emergency.

Concern with Centers Following Safety Measures and Procedures

There were problems with centers following safety measures and procedures. These problems primarily related to fire drills, posting of evacuation plan and diagram, and choking victim signs.

Lack of Records of Fire Drills

The H Gilroy senior center did not have any record that any fire drills had been conducted within the year. DFTA's Performance Standards require that senior centers have at least two evacuation fire drills each year. DFTA's Standards also require that the center document the date and time of each fire drill. It is very important to the safety of the seniors and staff at these centers that fire drills are conducted. In the event of an emergency, such as a fire, seniors need to know how to safely exit the building quickly. Evacuation fire drills familiarize seniors with the process of how to exit the center during a fire. In the midst of a real fire they therefore may be less likely to panic. Additionally, fire drills point out any weaknesses in the evacuation plan that may require modification.

Evacuation Plan and Diagram Illegible or Not Posted

Four of the senior centers (Bronxworks East Concourse, JASA ThrogsNeck, Rain Middletown, and Stein) had problems concerning written evacuation plans and diagrams. DFTA's Performance Standards require that the centers post an evacuation plan that includes the location of fire extinguishers, exits, persons responsible for leading groups outside, and persons responsible for checking the facility. We observed that the written evacuation plan was blurry at Rain Middletown Senior Center and was not even displayed at Bronxworks East Concourse and Stein Senior Centers. The building manager for Stein Center said that it has an evacuation plan, but it is not displayed. Emergency safety depends on proper planning and notification. It is important that these centers post a written evacuation plan in accordance with DFTA's procedures to show seniors and staff how to respond in the event of a crisis, disaster, fire, or other incident to protect and ensure their safety. Although we observed a written evacuation plan at JASA ThrogsNeck Center, we found that it was in terrible condition and could cause a serious safety issue if anyone needed to follow it during an emergency. A portion of the paper

was torn off one corner and a portion of the paper was missing from the middle. **(See photograph 3 in Appendix II)**

Choking Victim Sign Not Posted

We found that the choking victim sign was not posted in the dining area at two senior centers (Bronxworks East Concourse and Stein). DFTA's Performance Standards require that a Choking/First Aid poster be placed in all dining rooms as part of a safety measure to ensure that food emergencies are handled appropriately. It is important that the choking victim sign is placed in the dining area because it shows the emergency procedures to be followed if someone is choking on food, a potentially life-threatening situation.

Improper Maintenance within Centers

Our visits to the centers raised concerns about cleanliness and general maintenance in the bathrooms and other areas of the centers.

Problems with Bathroom Cleanliness and Maintenance

DFTA's Performance Standards require that all program rooms in the center, including the bathroom, are kept clean and well maintained, that toilets and sinks are in working condition, and that paint, plaster, and tiles be in good condition. We found problems at 18 senior centers concerning cleanliness and maintenance of the bathrooms. These problems included non-working toilets and urinals, backed up or flooded toilets, no hot or cold water, leaking faucets, a sink nearly collapsing, missing wall tiles, missing or damp ceiling tiles, and dirty toilet seats. The poor conditions and degree of severity differed among the 18 senior centers. **(See Photographs numbers 4 to 6 in Appendix II.)**

Table III lists the 18 senior centers that had some type of cleanliness or maintenance problem in the bathrooms.

Table III**18 Senior Centers with Problems in Bathroom Cleanliness and Maintenance**

Senior Centers	Physical and Sanitary Concerns In Bathrooms	Toilets and Urinals Not Operating Properly	Faucets Not Working Properly
JAMES MONROE	X		X
NORTHEAST BRONX	X	X	
TIMES PLAZA	X	X	X
WILLOUGHBY SENIOR CENTER	X	X	X
A PHILLIP RANDOLPH	X		
SMITH HOUSES			X
CCNS CATHERINE SHERIDAN	X		
ELMHURST JACKSON HEIGHTS		X	X
HANAC LINDSAY	X	X	
JASA ROY REUTHER SENIOR CENTER	X		
KOREAN AMERICAN	X		
ROCHDALE	X		
SELFHELP LATIMER GARDENS		X	
SUNNYSIDE COMMUNITY			X
YOUNG ISRAEL QUEENS VALLEY	X		
CASSIDY COLES	X		X
CYO SENIOR GUILD LUNCH	X		X
JCC SOUTH SHORE		X	
TOTALS	13	7	8

Senior centers should provide seniors with bathrooms that are clean, well maintained, fully functioning, and pleasant. This should be a priority at all centers.

Problems with General Maintenance and Cleanliness of the Centers

DFTA's Performance Standards require that program rooms in the centers are kept clean, well maintained, and safe for seniors. We found problems at 24 centers concerning the maintenance and condition of those centers. We observed problems with the flooring (including broken, cracked, chipped, missing, or loose tiles) at four of the centers. Missing or loose floor

tiles can lead to a senior tripping and falling. At West Brighton Senior Center, the floors in the activity room appeared to be warped, a potential trip hazard. We observed problems with the ceilings (breaks, cracks, chipping or missing tiles, water damage, hanging parts from ceiling) and walls at 15 of the centers. Damaged ceiling tiles or hanging parts can fall onto a senior citizen and cause serious harm. Damp ceiling tiles can cause mildew and prolonged exposure can cause mild to severe health problems. Also, the associate director at James Monroe Senior Center claimed that the hole in his office wall contained asbestos, another potential safety hazard if not handled properly.

We also observed problems with the general cleanliness (includes unclean areas, dirty floors or windows, broken windows) at 10 centers. Another problem we observed was peeling paint at six centers. DFTA's Performance Standards require that paint is maintained in good condition. According to the program director at Haber Senior Center, the center had not been painted in over 20 years. **(See Photograph numbers 7 to 9 in Appendix II.)** While the problems noted at the 24 centers varied, the results are all potential safety hazards for seniors.

Table IV lists the 24 senior centers that had general maintenance and cleanliness problems which can create safety hazards for seniors and others attending the centers.

Table IV24 Senior Centers with General Maintenance and Cleanliness Problems

Senior Centers	Flooring Problems	Ceilings or Walls Problems	Peeling Paint/Plaster Problems	General Cleanliness Problems
James Monroe			X	
JASA Throgs Neck		X		
Rain College Avenue	X+			
Rain Middletown			X+	
Rain Nereid				X
CCNS Glenwood		X		
H Gilroy		X•		X•
Haber			X+	
Penn-Wortman	X			
Times Plaza		X•	X	
Willoughby			X	X
A Phillip Randolph		X+•		
ARC Ft Washington		X+		
CCNS Catherine Sheridan		X	X	X
Hanac Lindsay		X		
JSPOA Rockaway Blvd	X	X+		
Korean American Senior Center Flushing		X+•		X
Young Israel Queens Valley		X•		X
Cassidy Coles		X+		X+
CYO Senior Guild Lunch				X
New Lane		X+•		
Stapleton		X+		
Staten Island Friendship Club		X		X
West Brighton	X			X•
TOTAL	4	15	6	10

+ Conditions also noted by DFTA during inspections conducted during fiscal year 2012.

• Conditions also noted by DOHMH during inspections conducted during fiscal year 2012.

Centers should be maintained in good condition and the physical environment should be a place that is comfortable and safe for the elderly, some of whom may be very fragile, weak, have mobilization issues, or require special assistance.

Concerns with Sanitary Practices, Equipment Maintenance, and Pest Control in Kitchen and others Areas

Our visits to the centers also raised concerns about pest control, equipment maintenance, and sanitary practices in the kitchen.

Lack of Pest Control

During our visits to the senior centers, we observed evidence of various types of rodent and vermin infestation at 15 centers. DFTA's Performance Standards require that there is no infestation of roaches, rodents, or any other pests in the kitchen, bathroom, or program rooms in the senior centers. We found problems with pest control in the kitchen or storage area at 11 of these centers and in other areas of an additional four centers. We observed live roaches, dead roaches, and flies and saw rodent droppings, which are evidence of mice activity. **(See photographs No. 10 to 13 in Appendix II.)** For example, at Selfhelp Latimer Senior Center, we saw roach and insect infestation in the kitchen. There was a glue mat on the floor filled with roaches. At ARC Ft. Washington Senior Center in Manhattan, we observed a dead mouse that was captured in a glue trap. These types of problems were not limited to the kitchen and food storage areas. At A. Phillip Randolph Senior Center, we saw numerous flies throughout the facility and noticed that fly strips were hanging from the ceilings to address the problem. The problems we noted with pest control at the senior centers varied in degree and severity. However, what all these centers have in common is a need for more frequent extermination services. DFTA Performance Standards require that the centers have extermination service done on a monthly basis and even more frequently if needed.

Table V lists the names of the 15 centers where we have concerns with pest control.

Table V

15 Senior Centers with Pest Control Problems

Senior Centers	Rodent & Vermin Infestation	Infestation Found in Kitchen or Storage Area
H. Gilroy	X•	
Haber Senior	X	
Penn-Wortman	X	
Times Plaza	X	X
Willoughby	X	X
A Phillip Randolph	X	X•
ARC Washington	X	
City Hall	X	X•
Hamilton Grange	X	X•
Lenox Hill Senior Center II	X	X
CCNS Catherine Sheridan	X	X•
CCNS Ozone Park	X	X
Korean American Senior Center - Flushing	X	X•
Selfhelp Latimer	X	X•
Cassidy Coles	X•	X
TOTALS	15	11

• Conditions also noted by DOHMH during inspections conducted during fiscal year 2012.

The types of infestation previously discussed can pose a danger to the health and safety of the seniors attending these centers. Those problems should be remedied.

Problems with Equipment Maintenance and Adherence to Sanitary Practices in the Kitchen

We found problems in the kitchens at 12 of the centers we visited. These problems concerned cleanliness and functionality of some equipment and adherence to sanitary practices. DFTA requires that all rooms used for the preparation, storage, and serving of food be maintained according to State Sanitary Code 14-1, which includes food protection, equipment cleanliness, plumbing, and sanitation requirements. Our concerns relate to the cleanliness of stoves, the kitchen, lack of or broken thermostats, inadequate temperatures in refrigerators and freezers, expired food, and lack of hot water in the kitchen. The stoves at four centers (Rain College Avenue, H. Gilroy, Elmhurst Jackson Heights, and Korean American Senior Center – Flushing) appeared unclean and unsanitary. (**See Photograph No. 14 in Appendix II.**) According to section 14-1.10 of the State Sanitary Code, “food-contact surfaces of all cooking equipment are to be kept free of encrusted grease deposits and other accumulated soil.” An unclean condition where food is prepared is unacceptable and can pose a health risk. At the Korean American Senior Center, we also observed some type of liquid waste on the kitchen floor.

According to State Sanitary Code 14-1, there are certain refrigeration and temperature requirements necessary to protect food from contamination. To comply with the State Sanitary code, DFTA’s Performance Standards require that refrigerators and freezers have accurate

inside thermometers that register the temperatures. We found varying problems at five of the centers concerning whether the required temperatures were being maintained in the freezers and refrigerators. We found refrigerators and freezers that did not have the required temperatures at Northeast Bronx and Senior Citizen League of Flatbush Senior Centers. We found that the thermometers were broken at Selfhelp Latimer and CYO Senior Guild Lunch centers, and there was no thermometer at all at Haber Senior Center. It is important that food which requires refrigeration is kept at the required temperature to inhibit the growth of mold and bacteria.

We also observed canned food that was expired. During our August 16, 2012, visit to the H. Gilroy Senior center, we observed canned food with an expiration date of January 2011. At JASA Roy Reuther Senior Center, we observed canned food with an expiration date of 2009. **(See Photograph No. 15 in Appendix II)** These centers serve food to seniors on a daily basis. Consumption of improperly refrigerated or expired foods can place the health of the seniors in jeopardy and possibly lead to food poisoning.

DFTA's Performance Standards require that the centers follow sanitary practices such as making sure that food preparation takes place only when there is hot and cold running water. We also found that there was no hot water in the kitchens at two centers, Willoughby and Selfhelp Austin. Hot water is necessary to sanitize and prevent bacteria.

DFTA's Monitoring of Senior Centers Needs Improvement

Our review of DFTA's case files raises concerns regarding its monitoring of senior centers. These concerns primarily relate to unannounced visits conducted the same day as scheduled follow-up visits.

Unannounced Monitoring Visits Conducted Same Day as Scheduled Visits

Scheduled inspections and unannounced inspections were performed on the same day at some senior centers. DFTA is minimizing the effectiveness of the unannounced inspection by doing it on the same day as a scheduled inspection. Unannounced visits provide incentive for sponsors to remain in compliance with DFTA's performance standards for contracted services. Based on our review of DFTA case files for the 43 senior centers that we found with conditions, a scheduled follow-up inspection and the unannounced inspection for fiscal year 2012 were conducted on the same day for 37 of the 43 (86 percent) unannounced visits conducted by the same nutritionist. At the May 17, 2013 exit conference, DFTA officials stated that the monitoring procedures recently changed and follow-up monitoring visits are now performed during the unannounced visit. DFTA's oversight of senior center compliance is weakened by reducing potentially three separate visits (initial, follow-up, and an unannounced visit) to two visits.

DFTA's Awareness of Recurring Problems at Senior Centers

Based on our review of DOHMH Inspection Reports and DFTA case files for fiscal years 2010 – 2012, combined with our unannounced observations of the 43 senior centers where we found conditions, we noted problems throughout the centers that seem to be recurring and are of concern and need more affirmative action by DFTA. The concerns relate to areas previously

discussed in this report--fire and personal safety problems, improper maintenance, and concerns with sanitary practices and pest control.

Fire and Personal Safety Recurring Issue

There were four centers (Willoughby, Haber, Stapleton, and West Brighton) that did not have a valid place of assembly permit. As previously stated, a Place-of-Assembly permit documents the maximum number of persons that should be allowed in a room at the same time in order to promote fire safety and avoid a safety hazard. Based on our observations and review of DFTA's files, we found that DFTA was aware that these four senior centers did not have a valid place-of-assembly for three consecutive years, i.e., 2010, 2011, and 2012. Although the Place-of-Assembly permit is a paper document, it is also a visual safety reminder that should be conspicuously posted at all times noting the maximum number of persons who can safely assemble in a given room.

Improper Maintenance Recurring Issue

There were 10 centers that DFTA records indicate had recurring problems over multiple fiscal years concerning improper maintenance. Issues included leaking faucets in bathrooms, lack of ventilation in storeroom, lack of lighting or bulbs not working, scuffed floors, ceiling tiles that needed to be cleaned or replaced, and missing tiles throughout the center facility. For example, a problem that was observed by auditors in 2012 and by DFTA officials in 2010, 2011, and 2012 was that ceiling tiles were damaged and needed to be replaced at Cassidy Coles Senior center. Damaged ceiling tiles can fall from above, descend with significant impact, and could harm a senior. This situation presents a safety hazard to seniors in the centers and should be corrected immediately and monitored for corrective action.

Recurring Problems with Sanitary Practices and Pest Control

There were 11 centers that DFTA records indicate had recurring problems over multiple fiscal years concerning sanitary practices and pest control. These problems included missing thermometer in store room, no grease traps in cooking area, fly infestation, indirect drain not provided in kitchen as per sanitary code, evidence of mice activity, and facility conditions conducive to pest life. Regarding problems with sanitary practices, at Times Plaza Senior Center for fiscal years 2010, 2011, and 2012, DOHMH found that the indirect drain was not provided in the kitchen as required by the sanitary code. According to New York State Sanitary Code section 14-1.140 Plumbing, "Waste lines from equipment requiring indirect drains are to be installed so as to prevent backflow from sewers and drains from other fixtures." Regarding problems with pest control, for example, mice activity was observed at Hamilton Grange Senior Center by auditors in fiscal year 2012 and by DOHMH in fiscal years 2010, 2011, and 2012. As another example, fly infestation was observed at A.Phillip Randolph Center by auditors in fiscal year 2012 and by DOHMH in fiscal years 2010 and 2011. Another example is that at two centers (H.Gilroy and A.Phillip Randolph), DOHMH found conditions conducive to pest life in fiscal years 2010, 2011, and 2012. DFTA should follow up behind DOHMH inspections and make sure that the centers are addressing these recurring issues. Table VI lists the centers that had recurring problems over multiple fiscal years.

Table VI
18 Centers with Recurring Issues over Multiple Years

Senior Center	Fire and Personal Safety Concern	Improper Maintenance	Concern with Sanitary Practices/ Pest Control
West Brighton	X		
North East Bronx		X	
Rain College Avenue		X	X
H. Gilroy		X	X
Times Plaza		X	X
Willoughby	X	X	X
A.Phillip Randolph			X
ARC Ft. Washington		X	X
City Hall			X
Hamilton Grange			X
Staten Island Friendship		X	
JASA Roy Reuther			X
Selfhelp Austin		X	
Sunnyside Community Center			X
Cassidy Coles		X	
Haber	X		
New Lane		X	
Stapleton	X		X
TOTALS	4	10	11

These recurring issues point to the need for DFTA to be vigilant in its oversight of these centers.

CONCLUSION

Based upon the conditions observed during our unannounced visits to DFTA-affiliated senior centers, we have concluded that DFTA needs to strengthen its current monitoring practices to ensure that senior center clients are afforded a facility environment that is consistently maintained in a safe and sanitary condition. DFTA's unannounced visit to a senior center, when performed at the same time as a scheduled follow-up visit, renders the well intended unannounced visit set-up meaningless. Similarly, permitting centers to "self-certify" (by fax) that previously identified issues have been rectified and that a follow-up on-site visit is no longer necessary, creates an opportunity for center sponsors to avoid or delay properly addressing the cited issue. This is evident by the frequency of recurring issues identified in DFTA's and DOHMH's annual inspection reports. DFTA needs to more effectively enforce its monitoring procedures to ensure the proper maintenance of centers and that the senior citizens who use the center do not encounter conditions that are illustrated in this report.

Recommendations

DFTA should:

1. Inspect the centers cited in the report to ensure that the problems have been corrected and have not reoccurred.

DFTA Response: DFTA did not indicate whether it intends to implement this recommendation. In its response DFTA stated “conditions are considered resolved when it has been verified independently by DFTA from a site visit. DFTA accepts the submission of required documentation, **only** if the issue is solely because of missing/expired documentation, e.g. renewed place of assembly permit. This ongoing practice can be corroborated independently by contacting the senior center programs”

2. Enhance its monitoring and oversight of senior centers by revising its inspection procedures to ensure that:
 - Supervisor approval is documented in the inspection files when conditions identified during an inspection are resolved upon submission of reliable documentation.
 - Prior to contract negotiation, DFTA should conduct an inspection identifying all conditions that need to be corrected. A punch-list of conditions should be discussed and given to center sponsors at the completion of the inspection with an established timeframe for corrective action. Prior to lease signing, a thorough follow-up inspection should be conducted to ensure that all conditions have been corrected.
3. Establish a system that tracks recurring problems at each center. Recurring problems need to be corrected before renewing contracts. Serious safety and sanitary conditions should be corrected before signing the contract.
4. Ensure that centers contact the responsible City agency (Department of Buildings, FDNY, or NYCHA) to obtain the required Place-of-Assembly permits and required fire inspections.
5. Revise its procedures to ensure that inspectors review and document whether specific violations cited on DOHMH inspection reports were corrected.

DFTA Response: DFTA did not indicate whether it intends to implement recommendations 2, 3, 4, and 5.

In its response, DFTA stated that “as a matter of routine policy and protocol, a typical senior center receives at minimum five site visits, including a minimum of two unannounced follow-up visits. Scheduled assessment visits are never done at the same time as unannounced follow-up visits. They are distinct and separate visits.

DFTA’s assessment requires senior center programs to have PA permits,*fire inspections, and corrections of violations cited by Department of Health inspection reports. Furthermore, in addition to the assessment process, DFTA and the Department of Health (DOH) are in communication throughout the year

regarding DOH health violations and to ensure that the programs address the violations promptly. The DOH inspection reports are kept electronically and centrally at DFTA so any DFTA staff can have access to them.

If during the assessment, non-compliance issues are revealed, these non-compliance issues are recorded in the programs' assessment reports, tracked in the electronic Program Assessment System (PAS), and are followed up or inspected by DFTA staff.

When programs do not comply, their annual VENDEX evaluations, the City's contract performance evaluation tool, is negatively impacted. Supervisors currently sign off on all initial and final assessment letters to senior center programs, which documents any compliance issues."

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.

The scope of this audit covers the period from July 1, 2011, through August 21, 2012, the date of our last visit to the senior centers. We also reviewed DFTA case files going back to July 1, 2009, to determine whether the physical conditions observed during our scope period existed for an extended prior period.

To gain an understanding of the controls and processes involved with DFTA's oversight and monitoring of senior citizen centers, we interviewed the Deputy Assistant Commissioner from the Bureau of Community Services, a DFTA program officer, nutritionist, and other DFTA officials. We reviewed DFTA Performance Standards and other DFTA records to determine the maintenance and performance standards that DFTA applies to senior citizen centers. We also reviewed the assessment tools used by DFTA program officers and nutritionists to monitor senior citizen center compliance with DFTA requirements.

We developed an audit observation checklist using the standards listed in DFTA's assessment tools. To assess DFTA's monitoring of the maintenance and cleanliness of senior centers, we conducted unannounced observations at 63 senior centers randomly selected from the population of 258 DFTA senior centers listed on DFTA's website on August 6, 2012. The centers were selected among the five boroughs (Manhattan, Bronx, Brooklyn, Queens, and Staten Island). Our observations were documented using the above checklist.

The unannounced observations of the 63 senior centers were conducted between August 14, 2012, and August 21, 2012. (We originally randomly selected 70 centers, but on the day of our unannounced visit, some centers were either closed or did not allow the auditors entry into their facility because the center was no longer a DFTA-funded center.) Using the audit observation checklist, we recorded our observations of each center's safety, sanitary conditions, and physical conditions. We also reviewed documentation from the senior centers relating to fire permits and inspections, fire drills, evacuation plans, incident reports, and Food Service Handler's Permits from DOHMH. The results of the observations revealed that 20 of the 63 senior centers appeared to be in compliance with requirements listed on DFTA's assessment tools. We found that there appeared to be issues of non-compliance with criteria listed on DFTA's assessment tools at 43 of the senior centers in our sample. Our audit focused on those 43 centers.

We reviewed DFTA's case files for the 43 senior centers where we found apparent issues of non-compliance with DFTA standards during our unannounced visits. We reviewed case files for each of the three past fiscal years 2010 through 2012. We checked to see if DFTA found the same issues of non-compliance that we found, whether there were recurring issues, and whether there was evidence that an unannounced monitoring visit was conducted (for fiscal year 2012 only). We also checked to see whether DFTA had copies of DOHMH inspection reports in its files for inspections conducted in fiscal year 2012 and whether those inspection reports identified the same conditions.

The results of the above tests, while not projected to their respective populations, provided us with a reasonable basis to determine whether DFTA properly maintains and monitors the conditions of its senior centers.

**LIST OF 63 SENIOR CENTERS WHERE AUDITORS CONDUCTED
UNANNOUNCED OBSERVATIONS**

#	NAME OF SENIOR CENTER	BOROUGH	NO PROBLEMS	CONDITION CITED
1	Bronxworks E. Roberts Moore Senior Center	Bronx	X	
2	Bronxworks East Concourse Senior Center	Bronx		X
3	Bronxworks Innovative Senior Center	Bronx	X	
4	Co-op City Senior Center	Bronx	X	
5	James Monroe Senior Center	Bronx		X
6	JASA Throgs Neck Senior Center	Bronx		X
7	Mosholu Montifiore Senior Center	Bronx	X	
8	Northeast Bronx Senior Citizen Center	Bronx		X
9	PSS Highbridge Senior Center	Bronx	X	
10	Rain College Avenue Senior Center	Bronx		X
11	Rain Middletown Senior Center	Bronx		X
12	Rain Nereid Senior Center	Bronx		X
13	William Hodson Senior Center	Bronx		X
14	Boro Park Senior Center	Brooklyn		X
15	CCNS Glenwood Senior Center	Brooklyn		X
16	H Gilroy Senior Center	Brooklyn		X
17	Haber Senior Center	Brooklyn		X
18	Penn-Wortman Senior Center	Brooklyn		X
19	Roundtable Senior Citizens Center	Brooklyn	X	
20	Senior Citizen's League of Flatbush Senior Center	Brooklyn		X
21	Times Plaza Senior Center	Brooklyn		X
22	Van Dyke Senior Center	Brooklyn	X	
#	NAME OF SENIOR CENTER	BOROUGH	NO	CONDITION

			PROBLEMS	CITED
23	Willoughby Senior Center	Brooklyn		X
24	Young Israel of Midwood Senior Center	Brooklyn	X	
25	A Phillip Randolph Senior Center	Manhattan		X
26	ARC Fort Washington Senior Center	Manhattan		X
27	Carter Burden Senior Service Center	Manhattan	X	
28	City Hall Senior Center	Manhattan		X
29	Hamilton Grange Senior Center	Manhattan		X
30	Hargrave Senior Center	Manhattan	X	
31	Lenox Hill Senior Center II	Manhattan		X
32	Moriah Older Adult Luncheon Club	Manhattan	X	
33	Smith Houses Senior Center	Manhattan		X
34	Stein Senior Center	Manhattan		X
35	University Settlement Nutrition	Manhattan		X
36	West Side Federation Senior Center	Manhattan	X	
37	CCNS Catherine Sheridan Senior Center	Queens		X
38	CCNS Ozone Park Senior Center	Queens		X
39	Elmhurst Jackson Heights Senior Center	Queens		X
40	Hanac Lindsay Senior Center	Queens		X
41	JASA Roy Reuther Senior Center	Queens		X
42	JSPOA Rockaway Blvd Senior Center	Queens		X
43	Korean American Senior Center – Flushing	Queens		X
44	Raices Corona Senior Center	Queens	X	
45	Rochdale Senior Center	Queens		X
46	Selfhelp Austin Street Senior Center	Queens		X
47	Selfhelp Clearview Senior Center	Queens	X	
48	Selfhelp Latimer Gardens Senior Center	Queens		X

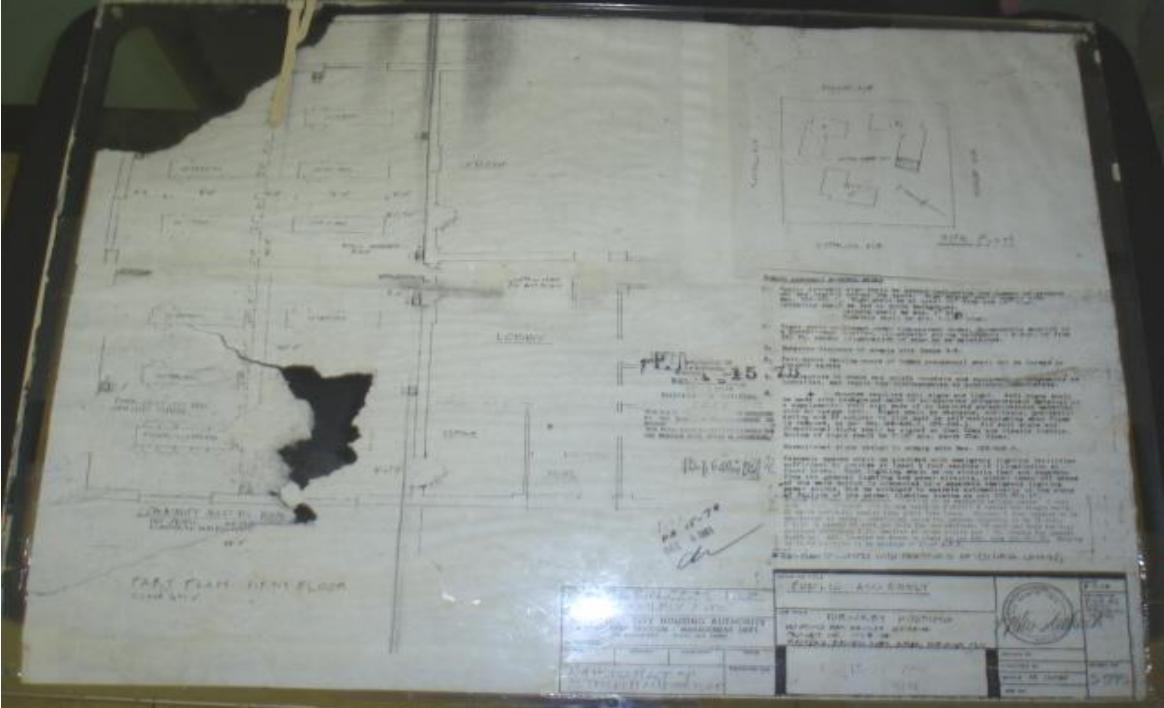
#	NAME OF SENIOR CENTER	BOROUGH	NO PROBLEMS	CONDITION CITED
49	Sunnyside Community Senior Center	Queens		X
50	Young Israel Queens Valley	Queens		X
51	Arrochar Friendship Club Senior Center	Staten Island	X	
52	Cassidy Coles Senior Center	Staten Island		X
53	CYO Senior Guild Lunch	Staten Island		X
54	Forever Young Senior Center	Staten Island	X	
55	JCC of Staten Island Innovative Senior Center	Staten Island	X	
56	JCC South Shore Senior Center	Staten Island		X
57	Mount Loretto Friendship Club Senior Center	Staten Island	X	
58	New Dorp Friendship Club Senior Center	Staten Island	X	
59	New Lane Senior Center	Staten Island		X
60	Stapleton Senior Center	Staten Island		X
61	Staten Island Friendship Club	Staten Island		X
62	Todt Hill Friendship Club Senior Center	Staten Island	X	
63	West Brighton Senior Center	Staten Island		X
	TOTALS		20	43



Photograph No.1 – Obstructed exit door at the Korean American Senior Center



Photograph No.2 – Light out in hallway at Rain Middletown Senior Center



Photograph No. 3 – Written evacuation plan diagram with portions of the diagram missing at JASA ThrogsNeck Center



Photograph No. 4– Women’s bathroom out of order at Willoughby Center



Photograph No. 5 – Dirty toilet seat at Cassidy Coles Center



Photograph No. 6 – Out of order urinal at North East Bronx Center



Photograph No. 7 – Peeling paint at CCNS Glenwood Center



Photograph No. 8 – Water stained ceiling tiles and a portion of one tile is missing at New Lane Center



Photograph No. 9 – Warped floor in activity room at West Brighton Center



Photograph No. 10 – Rodent droppings and expired food in pantry area at Korean American Center



Photograph No. 11 – Glue trap with multiple roaches at Selfhelp Latimer Gardens Center



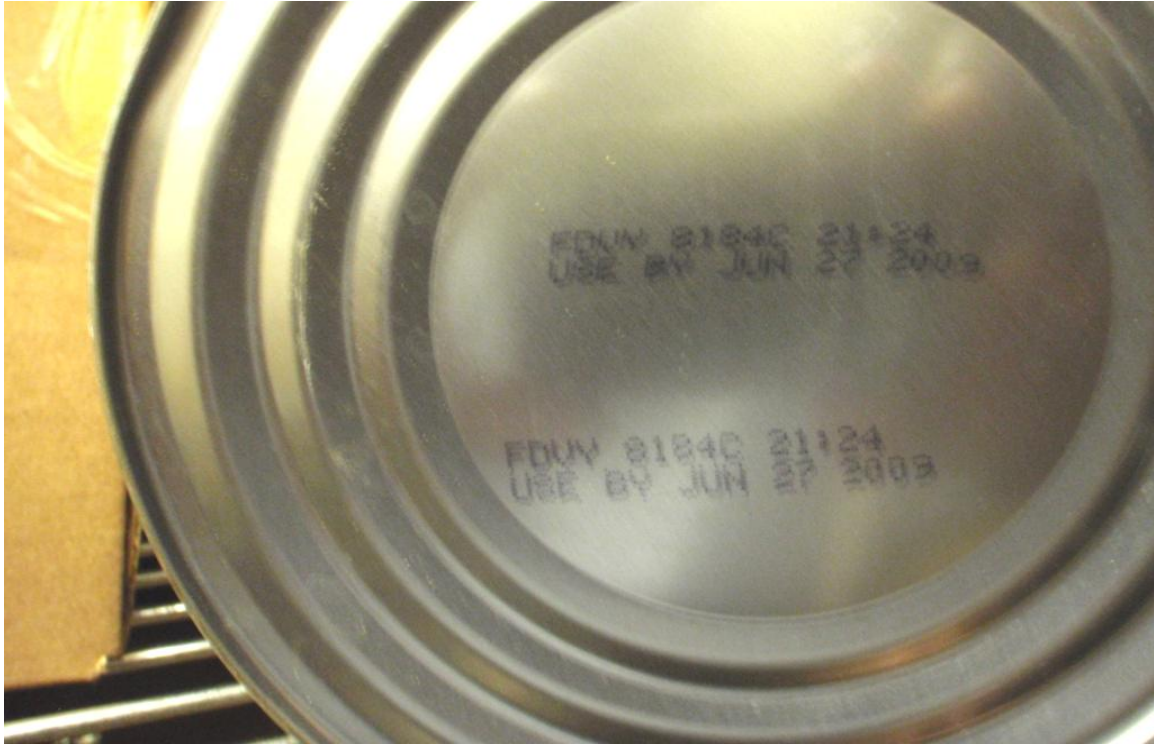
Photograph No. 12 – Mouse caught on glue trap at ARC Ft. Washington Center



Photograph No. 13 – Live roach observed at Penn Wortman Center



Photograph No. 14 – Unsanitary looking stove with food inside at Korean American Center



**Photograph No. 15 – Can of food with expiration date in 2009 at
JASA Roy Reuther Center**



Lilliam Barrios-Paoli
Commissioner

Joy C. Wang
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June 10, 2013

H. Tina Kim
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New York, NY, 10007-2341

Re: Comptroller's Audit on the Department for the Aging's (DFTA) Monitoring of Senior Center Facilities (FM13-056A)

Dear Deputy Comptroller Kim:

Thank you for the opportunity to respond to the Comptroller's audit of the Department's monitoring of senior center facilities. The Department would like to both respond to the recommendations outlined in the audit and to some statements made in the audit report.

DFTA Response to the Comptroller's Audit Findings

While DFTA routinely tracks, monitors, and cites senior centers on facilities-related non-compliance issues*, this audit has highlighted the need for greater accountability by senior center programs to maintain clean and safe environments.

As such, DFTA will be adopting the following policies to hold senior center programs accountable:

1. For immediate health and safety concerns presenting a risk to the health and/or safety of seniors – the center will need to close immediately. The center will remain closed until the situation has been corrected.
2. Programs with serious health and safety concerns that do not pose an immediate threat to the health and well being of seniors will be required to correct the issue within ten business days. A follow-up visit will be conducted after the 10 day period. If the unsafe or unsanitary conditions have not been fully corrected to DFTA's satisfaction, the program will be required to remedy the situation within 5 business days. A second follow-up visit will be conducted after the 5 day period. Afterwards,

For unsanitary and unsafe conditions that jeopardize the safety and well-being of seniors using the center, the program will be closed immediately until the situation has been corrected.

For conditions that are serious but are not jeopardizing the safety of seniors, programs will be placed on check hold, i.e. not paid, until the situation has been corrected.

*A typical senior center will receive at minimum five visits by DFTA staff on an annual basis, including two unannounced site visits. Senior centers are cited in their annual assessments for non compliance items, and senior centers' VENDEX scores, the City's contract performance rating system, are negatively impacted. These non compliance items are tracked and kept in hard copy and electronically in the Department's Program Assessment System.

3. Where identified issues are chronically either not addressed or recurring, the senior center program will be placed on check hold, i.e. not paid, until the violation has been resolved. A follow-up visit will be conducted once the program informs DFTA that the situation has been resolved. Check hold will be released once confirmation of resolution is confirmed.

Secondly, 17 of the 43** centers cited in the audit report are located in New York City Housing Authority (NYCHA) sites. As such, where the responsibility falls on the City to address certain facility issues, the Department for the Aging will be reaching out and working with NYCHA to make sure those corrections are made and that senior center programs operating in NYCHA sites are providing services in a clean and safe environment.

And finally, DFTA would like to take this opportunity to update you on the status of the non-compliance issues cited in the audit report. As stated above, a condition is considered rectified when it has been independently verified by DFTA staff.

* 8 of the 14 senior centers cited as having problems with exits and passageways have rectified the condition. Of the remaining centers, 5 have started corrective actions. 1 center cited in the audit report was closed in January. Please see footnote below.

*4 of the 19 senior centers cited as lacking valid place of assembly and evidence of a fire inspection have rectified the condition. Please note that Place of Assembly (PA) is needed only for assembly places that accommodate 75 or more people. Willoughby senior center, Rochdale senior center, and the temporary site for the Stein senior center do not require a PA because there are no rooms at these sites that hold 75 or more people. The remaining 12 centers have taken corrective actions to obtain a renewed PA or fire inspection.

*15 of the 18 senior centers cited as having bathroom cleanliness and maintenance problems have rectified the condition. The remaining 3 centers have started corrective actions.

*14 of the 24 senior centers cited as having general maintenance and cleanliness problems have rectified the condition. For the remaining centers, 9 centers have started corrective actions. 1 center cited in the audit report was closed in January. Please see footnote below.

*11 of the 15 senior centers cited as having pest control problems have rectified the condition. Of the remaining centers, 2 have started corrective actions, and 2 have been given a deadline of July 1 to rectify the condition before DFTA takes progressive action.

*10 of the 18 senior centers cited for recurring issues in fire and personal safety concerns, overall maintenance, and sanitary practices//pest control have rectified the conditions cited. Of the remaining centers, 5 have started corrective actions, and 2 have been given a deadline of July 1 to rectify the condition before DFTA takes progressive action.

The Department thanks the Comptroller's office for highlighting the need for more accountability in having clean and safe environments to serve older New Yorkers.

Comments to the Audit Report

During the course of the audit, there was confusion, partly because of ambiguous labeling/phrasing on certain internal DFTA forms, and, partly, because some information is kept in hard copy and some information is kept electronically, which lead to the auditors' beliefs that DFTA does not independently verify through a site visit whether a problem has been corrected, that DFTA does not do unannounced site visits, that DFTA does not require/document supervisor approval before an issue is considered resolved, and that DFTA does not adequately follow-up on DOHMH inspection reports.

DFTA attempted to clarify this confusion at the exit conference with the Comptroller's Office on May 17, 2013 by providing further documentation and explanation and welcomed the auditors to corroborate DFTA's policies and practices by contacting the senior center programs directly or through interviewing DFTA program staff. Nevertheless, the confusion persisted and has become part of this audit report.

**Please note that one of the 43 senior centers, RAIN College Avenue senior center, closed in January 2013 and is no longer a DFTA-funded senior center.

As for the ambiguous labeling on an internal Agency document, DFTA apologizes for the confusion and will change the labeling to prevent this confusion in the future. However, for this audit report, DFTA would like state that:

Response to Comptroller's Recommendation #1: As explained at the exit conference with the Comptroller's office on May 17, 2013, conditions are considered resolved when it has been verified independently by DFTA from a site visit. DFTA accepts the submission of required documentation, **only** if the issue is solely because of missing/expired documentation, e.g. renewed place of assembly permit. This ongoing practice can be corroborated independently by contacting the senior center programs.

Response to Comptroller's Recommendation #2, #3, #4, and #5: As evidenced by the documentation submitted to the Comptroller's office at the exit conference on May 17, 2013, as a matter of routine policy and protocol, a typical senior center receives at minimum five site visits, including a minimum of two unannounced follow-up visits. Scheduled assessment visits are never done at the same time as unannounced follow-up visits. They are distinct and separate visits.

DFTA's assessment requires senior center programs to have PA permits,* fire inspections, and corrections of violations cited by Department of Health inspection reports. Furthermore, in addition to the assessment process, DFTA and the Department of Health (DOH) are in communication throughout the year regarding DOH health violations and to ensure that programs address the violations promptly. The DOH inspection reports are kept electronically and centrally at DFTA so any DFTA staff can have access to them.

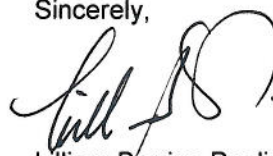
If during the assessment, non-compliance issues are revealed, these non-compliance issues are recorded in programs' assessment reports, tracked in the electronic Program Assessment System (PAS), and are followed up or inspected by DFTA staff.

When programs do not comply, their annual VENDEX evaluation, the City's contract performance evaluation tool, is negatively impacted. Supervisors currently sign off on all initial and final assessment letters to senior center programs, which documents any compliance issues. The letters have been shared with the auditors, which show the supervisors' signatures. The above monitoring schedule and practice can be corroborated by the senior center programs that DFTA monitors.

Lastly, though DFTA believes that protocols are in place to monitor and track the conditions of senior center facilities, this audit does demonstrate the need for more accountability from senior center programs so that older New Yorkers can receive services in a clean and safe environment. As such, as mentioned at the beginning of this letter, DFTA will be adopting these new accountability policies.

In closing, the Department appreciates the opportunity to respond to this audit. If you have any questions about this written response, please contact Joy Wang at (212) 442-1043 or by e-mail at jwang@aging.nyc.gov.

Sincerely,



Lilliam Barrios-Paoli
Commissioner

cc: Bill Chong, Deputy Commissioner (DFTA)
John Jones, Controller (DFTA)
George Davis III, Mayor's Office
Lawrence Welgrin, Audit Manager (Comptroller's Office)