

# AUDIT REPORT



CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BUREAU OF FINANCIAL AUDIT  
**WILLIAM C. THOMPSON, JR., COMPTROLLER**

## **Follow-up Audit Report on the Section 8 Housing Choice Voucher Program of the Department of Housing Preservation and Development**

*FS09-105F*

**July 30, 2009**



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
1 CENTRE STREET  
NEW YORK, N.Y. 10007-2341

WILLIAM C. THOMPSON, JR.  
COMPTROLLER

**To the Citizens of the City of New York**

Ladies and Gentlemen:

In accordance with the responsibilities of the Comptroller contained in Chapter 5, §93, of the New York City Charter, my office has audited the Department of Housing Preservation and Development's (HPD's) Section 8 Housing Choice Voucher Program.

Section 8 is a federally funded housing subsidy program that offers low-income families the opportunity to choose and lease safe, decent, and affordable privately-owned rental housing that they otherwise could not afford by providing additional, supplemental funds. HPD applies for and provides Section 8 funds to eligible families in accordance with federal rules and regulations and currently administers vouchers for approximately 26,000 households. We audit programs of the City agencies such as this to ensure that they are cost-effective, efficient, secure, and operate in the best interest of the public.

The results of our audit, which are presented in this report, have been discussed with HPD officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at [audit@Comptroller.nyc.gov](mailto:audit@Comptroller.nyc.gov) or telephone my office at 212-669-3747.

Very truly yours,

A handwritten signature in cursive script that reads 'William C. Thompson, Jr.'.

William C. Thompson, Jr.

WCT/fh

**Report: FS09-105F**  
**Filed: July 30, 2009**

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*The City of New York  
Office of the Comptroller  
Bureau of Financial Audit  
Support Services Division*

**Follow-up Audit Report on the  
Section 8 Housing Choice Voucher Program of the  
Department of Housing Preservation and Development**

**FS09-105F**

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**AUDIT REPORT IN BRIEF**

This follow-up audit determined whether the Department of Housing Preservation and Development (HPD) implemented the five recommendations made in a previous audit entitled *Audit Report on the Section 8 Housing Choice Voucher Program of the Department of Housing Preservation and Development*, (FN04-060A) issued October 17, 2005.

The previous audit determined whether HPD properly accounted for the Section 8 funds that it received from U.S. Department of Housing and Urban Development (HUD) for the Section 8 Housing Choice Voucher Program (HCV Program) and appropriately disbursed funds to landlords on behalf of eligible families in accordance with HUD and HPD guidelines. The audit found that HPD properly accounted for the Section 8 funds received from HUD and generally disbursed funds to landlords appropriately. In addition, payments to landlords were generally made in accordance with HUD and HPD guidelines.

However, in some instances, the audit disclosed that HPD files lacked the required documentation and as a result it could not be determined whether families were eligible for benefits, whether landlords received appropriate payments, and whether required annual inspections and re-certifications were conducted, as required by HPD guidelines.

HPD made excessive Housing Assistance Payments (HAP) to landlords totaling \$11,141, for seven client cases, and \$195,434 in questionable payments to landlords for 42 client cases that lacked required documents, preventing the auditors from determining the appropriateness of these payments. Thus, that audit estimated that \$5,525,493 of \$101,900,572 paid to landlords was questionable.

## **Audit Findings and Conclusions**

The current follow-up audit disclosed that of the five recommendations made in the previous audit, HPD has implemented two and partially implemented three. We found that of the 25 files reviewed, 12 files lacked 16 required documents (HPD subsequently submitted 8 documents for 8 files), and our review of HPD's HAP Register Payment History Reports determined that payments are being made to four cases of the 25 files reviewed that lacked proper documentation, which indicates a lack of internal controls. The previous audit estimated that \$5,525,493 was questionable due to a lack of required documentation. For comparative purposes, we now estimate that some \$3.9 million paid to landlords could be in question due to lack of proper documentation. In addition, HPD was able to recoup only \$1,122 of the total \$11,141 in incorrect HAP payments found previously.

## **Audit Recommendations**

To address the issues that still exist, we recommend that HPD should:

- Ensure that all necessary documents are included in the files, specifically those related to HAP contracts, and that it adheres to all applicable HUD and HPD regulations and guidelines.
- Determine whether the four files for which payments were made despite the lack of proper documentation are eligible for Section 8 subsidies, and if necessary, begin recoupment procedures.

## INTRODUCTION

### Background

The New York City Department of Housing Preservation and Development is the largest municipal developer of affordable housing in the nation. HPD protects the existing housing stock and expands housing options for New Yorkers as it strives to improve the availability, affordability, and quality of housing in New York City. HPD works with the community, non-profit, and for profit partners to strengthen neighborhoods, to increase the availability of well-maintained affordable housing, and to enable New Yorkers to become homeowners.

Section 8 is a federally funded housing subsidy program that offers low-income families the opportunity to choose and lease safe, decent, and affordable privately-owned rental housing that they otherwise could not afford by providing additional, supplemental funds. Local public housing authorities apply to HUD for Section 8 funds from the HCV Program, which are then provided to eligible families in accordance with HUD rules and regulations. In New York City, there are two public housing authorities that provide Section 8 housing vouchers: HPD and the New York City Housing Authority. Each awards vouchers and administers the program separately and differently. HPD currently administers vouchers for approximately 26,000 households.

Since the New York City Housing Authority is the primary public housing authority in New York City, HPD generally targets its Section 8 assistance to households whose primary nighttime residence is either a publicly- or privately-operated shelter under HPD jurisdiction or the home of another household, also under HPD jurisdiction, that is allowing the applicant temporary residence. In addition, HPD, through the Section 8 HCV Program, provides assistance to households residing in a building owned by the City or by an entity designated by the City to achieve its housing goals and that is in need of substantial renovation; and to households residing in buildings that have been newly constructed or renovated with financial assistance from HPD or in buildings for which HPD maintains regulatory responsibility. HPD also administers Section 8 benefits to households facing the imminent placement of their child or children in out-of-home care, or facing the delay of the return of their child or children from such care, primarily because of the households' lack of adequate housing as certified by the City's Administration for Children's Services. For fiscal year ending June 30, 2008, HPD received \$258,040,365 in Section 8 funds from HUD and \$13,217,479 in administrative fees, while having expenditures of \$296,851,835.

### Objective

The objective of this audit was to determine whether HPD implemented the five recommendations made in the previous audit, *Audit Report on the Section 8 Housing Choice Voucher Program of the Department of Housing Preservation and Development*, (FN04-060A) issued October 17, 2005.

## **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 the audit covered the period October 10, 2008, to February 28, 2009. To achieve our objective and gain an understanding of the policies and procedures governing HPD's HCV Program, we reviewed the findings and recommendations of the previous audit, *Audit Report on the Section 8 Housing Choice Voucher Program of the Department of Housing Preservation and Development*, issued October 17, 2005, and HPD's Audit Implementation Plan (AIP), dated December, 8, 2006. We interviewed various HPD officials responsible for the program and used the following sources of information as criteria to assess implementation:

- The *Department of Housing Preservation and Development Section 8 Tenant Based Assistance Housing Choice Voucher Program Administrative Plan* (Effective June 1, 2004) (Administrative Plan),
- *New York City Department of Housing, Preservation and Development: Housing Choice Voucher Program Housing Quality Standard Procedures Manual* (October 2008),
- HPD's "Elite" System Manual,
- HPD's Folder Reorganization Checklist,
- HPD's Housing Assistance Program (HAP) Register Payment History Reports, and
- HUD's Section 8 HUD *References* (February 1, 2007 Edition).

To assess whether HPD had implemented the corrective procedures outlined in its AIP and whether the implementation of those procedures corrected the weaknesses cited in the 2005 report, we reviewed the above documentation, conducted interviews, and reviewed files of Section 8 Housing Choice Voucher Program recipients.

We randomly selected 50 of 18,242 family files that HPD officials listed on their "HPD HCV Population" schedule dated December 10, 2008, to ascertain whether HPD accurately maintained files for each family receiving Section 8 benefits.

To determine whether family files contained the correct documentation, we reviewed 25 of the 50 above files and compared the documentation in the files to what was required by HPD's Administrative Plan and file checklists. We determined whether each file included documentation of the required annual recertification and annual inspection checklist, the HAP

contract, the lease agreement, and the determination of rent reasonableness. The previous report estimated the monetary effect of payments made in instances where there was a lack of required documentation. For comparative purposes in the current follow-up, we developed an estimate of the possible monetary effect of inappropriate payments that could have been made where there was a lack of required documentation.

To review the accuracy of the rent payment amounts we selected 10 files from the 25 files and matched the rent amounts stated in the files to the amounts listed on the HAP Register Payment History Report for the month of February 2009.

To determine whether HPD made improper payments for apartments that failed inspections, that did not receive completed annual inspections, or that had families who no longer met Section 8 standards for receiving subsidies, we reviewed the HAP Register Payment History Reports. We also noted any instances in which HPD recouped ineligible payments.

To determine whether annual inspections of tenants' apartments were completed in a timely manner, we examined the most recent annual inspection checklists and noted the dates of inspections. We also noted whether files lacked any inspection checklists. We compiled a list of pass, fail, or inconclusive inspections. For failed and inconclusive inspections, we examined any documents that would indicate whether the noted problems were addressed and corrected.

To confirm that HPD reviews its files and ensures that improper and questionable payments are not made, we evaluated several computer generated reports which included: Housing Quality Standard (HQS) Monthly Management Reports, Income Discrepancy Report, Deceased Tenant Reports, and HQS Abatement Reports. We also reviewed HPD's "Quality Assurance Internal Audit Memorandum."

We evaluated documents received from HPD to determine whether the necessary adjustments were made to the files of the landlords that incorrectly received excessive HAP payments and as well as those that received questionable payments, as detailed in the previous report. These documents included printouts from the Elite system, and HPD correspondence. In addition, we reviewed HUD and HPD regulations as they pertain to the various circumstances in question.

### **Discussion of Audit Results**

The matters covered in this report were discussed with HPD officials during and at the conclusion of this audit. A preliminary draft report was sent to HPD officials and discussed at an exit conference held on May 27, 2009. On May 29, 2009, we submitted a draft report to HPD officials with a request for comments. We received a written response from HPD officials on June 16, 2009. In their response HPD officials generally agreed with the audit and described the actions taken to address the report's recommendations.

The full text of the HPD response is included as an addendum to this report.

## RESULTS OF FOLLOW-UP AUDIT

Of the five recommendations made in the previous audit, HPD has implemented two and partially implemented three. In addition, HPD was able to recoup only \$1,122 of the total \$11,141 in incorrect HAP payments found previously.

During this follow-up audit, we found that of the 25 case files reviewed, 12 files lacked 16 required documents (HPD subsequently submitted 8 documents for 8 files). Our review of HPD's HAP Register Payment History Reports determined that payments made to 4 cases of the 25 files reviewed lacked proper documentation, which indicates a lack of internal controls. The previous audit estimated that \$5,525,493 was questionable due to a lack of required documentation. For comparative purposes, we now estimate that some \$3.9 million paid to landlords could be in question due to lack of proper documentation. In addition, HPD was able to recoup only \$1,122 of the total \$11,141 in incorrect HAP payments found previously.

### **Previous Finding:** Files Not Provided and Files Lacked Required Documentation

The previous report stated: "HPD . . . did not provide the files for five families of the 196 requested family files. Therefore, we could not determine whether the families in these cases were eligible to receive Section 8 benefits and whether HPD followed HUD and HPD guidelines. Moreover, our review of the 191 files that were provided revealed instances of files lacking required documentation: 107 files were lacking inspection checklists; 29 files had incomplete checklists; 24 files did not include suspension letters or follow-up inspection reports; and, 23 files did not contain documentation of rent reasonableness tests. As a result, we could not determine whether these families were eligible for benefits, whether landlords received appropriate payments, and whether required annual inspections and re-certifications were conducted, as required by HPD guidelines."

***Previous Recommendation #1:*** "Maintain files for each family receiving Section 8 benefits. In this regard, HPD should ensure that the files are not lost or misplaced, that documents necessary to determine eligibility, appropriateness of payments, and compliance with HUD and HPD regulations are included in the files, and that all information in the files is accurate and complete."

***Previous HPD Response:*** "HPD creates and maintains a separate file for every family receiving Section 8 assistance. HPD will continue to improve file tracking through a software program that assigns each file a unique scan barcode. This system allows files to be tracked by a digital time stamp that identifies the HPD borrower. In addition, HPD is implementing a file reorganization procedure to ensure that documentation is complete. Each file will include checklists indicating what information is needed for the case. All staff members have received extensive training that stresses the importance of maintaining proper documentation in each case file. The staff has been instructed to keep copies of inspection reports, suspension letters, and related materials in the tenant file. Periodic staff meetings reinforce the need for accurate and complete documentation."

Supervisors review individual case files to check for current and accurate information. In addition, HPD has instituted a new termination review process that will review files for complete documentation and appropriate payments.”

**Current Status:** PARTIALLY IMPLEMENTED

Of the 50 files requested, HPD was able to locate and provide all 50 files. However, our test of 25 of the 50 files to ascertain the appropriateness of payments found that 12 files lacked 16 required documents. (HPD subsequently submitted 8 documents for 8 of the 12 files, thereby proving the appropriateness of the payment made to the landlord). Of the remaining four of the 12 files that lacked documentation, three did not have a HAP contract (two of these three files also had inconclusive or failed inspections, of these two: one did not include a Lease Agreement while the second file did not contain the rent reasonableness test). The fourth file had a failed inspection.

Moreover, when we selected 10 payment amounts from the 25 requested files and matched the rent amounts stated in the files to the amounts listed on the HAP Register Payment History Report, we found that payments were still being made, as of February 1, 2009, in four cases that lacked proper documentation (discussed above). In the previous audit, we estimated that \$5,525,493 in payments made to landlords were questionable due to a lack of required documentation. Comparatively, we now estimate that some \$3.9 million paid to landlords could be in question due to lack of proper documentation.

We consider this recommendation to be partially implemented.

***Previous Recommendation #2:*** “Review its files to determine whether any improper and questionable payments have been made other than those mentioned in the report, and recoup any money due.”

***Previous HPD Response:*** “Case managers are constantly reviewing individual files to determine whether any improper payments have been made. Supervisors approve all certifications and provide another layer of oversight. Computer generated reports allow for payment review of the entire population. In the event of improper payment, money is recouped from the landlord. Additionally, a Quality Assurance team will examine a random sampling of files to determine whether any improper or questionable payments have been made.”

**Current Status:** PARTIALLY IMPLEMENTED

We found that HPD officials have several methods available to review files and ensure that improper and questionable payments are not made. However, as mentioned previously, we found 4 of 25 files with questionable payments, therefore, we consider this recommendation to be partially implemented.

**Previous Finding:** “Improper Payments to Landlords”

“HPD made excessive Housing Assistance Payments to landlords totaling \$11,141.” In these instances, overpayment amounts varied from \$3,980 to \$226.

***Previous Recommendation #3:*** “Make the necessary adjustments to the files for the seven landlords noted in this report and recoup the \$11,141 in HAP payments that was incorrectly sent to them.”

***Previous HPD Response:*** “The individual payment findings in the report are under review. All relevant documentation is being gathered and any necessary adjustments will be made. Landlords will be notified of money to be recouped.”

**Current Status:** PARTIALLY IMPLEMENTED

Our review found that HPD was able to recoup only \$1,122 of the total \$11,141 in incorrect HAP payments. The remaining \$10,019 could not be recouped because HPD did not have the documentation required by HUD and HPD regulations. Therefore, we consider this recommendation to be partially implemented.

**Previous Finding:** Questionable Rent Payments to Landlords Totaling \$195,434

“Our review of the 191 files that were provided revealed instances of files lacking required documentation, of information incorrectly entered into HPD’s computer system and of excessive HAP payments to landlords. Specifically, we found ... 42 families for which the lack of required documents led us to question \$195,434 in payments to landlords.”

***Previous Recommendation #4:*** “Investigate the 42 questionable payments detailed in this report and recoup any money due.”

***Previous HPD Response:*** “The questionable payments in the report are under review. All relevant documentation is being gathered and any necessary adjustments will be made. Landlords will be notified of money to be recouped.

**Current Status:** IMPLEMENTED

Based on our review of the documents provided by HPD officials we found that the 42 questionable payments were investigated and \$1,530 was recouped. In 28 of the 42 instances, HPD did not have the documentation required by HUD and HPD regulations. In 13 instances, HPD determined that no action was warranted, and one instance resulted in a recoupment. Therefore, we consider this recommendation to be implemented.

**Previous Finding:** “Files lacked required documentation, which therefore was not entered in HPD’s computer system, or in which information in the files was incorrectly entered in the computer.”

***Previous Recommendation #5:*** “Establish written procedures to ensure that all information entered into its computer system is accurate.”

***Previous HPD Response:*** “In 2004, HPD instituted the use of hand-held electronic devices for all HQS [Housing Quality Standards] inspections. This has reduced the number of data entry errors and guarantees a digital record of all inspections. All inspection information is downloaded into HPD’s computer system for accurate record keeping. With the help of industry consultants, HPD is developing policies and procedures to improve the overall accuracy of information entered into the computer system. Targeted staff training, increased supervisor oversight, and computer controls will improve the quality of data entry. Additionally, a Quality Assurance team will examine a random sampling of files to check that all information entered into the computer system is accurate.”

**Current Status:** IMPLEMENTED

We found that HPD has established written procedures to ensure that all information entered into its computer system is accurate. We reviewed the section on “Housing Quality Standard Handheld Inspections” in HPD’s *Elite System Manual* and the *New York City Department of Housing, Preservation and Development: Housing Choice Voucher Program Housing Quality Standard Procedures Manual* (October 2008). Therefore, we consider this recommendation to be implemented.

## RECOMMENDATIONS

To address the issues from the previous audit that still exist, we recommend that HPD:

1. Ensure that all necessary documents are included in the files, specifically those related to HAP contracts and that it adheres to all applicable HUD and HPD regulations and guidelines.

**HPD Response:** “HPD will continue to track files through barcoding software. HPD has implemented a file reorganization procedure to ensure that documentation is complete. Each file contains checklists indicating what information is needed for the case so that missing documents can be readily identified, and noted. All staff members have received extensive training that stresses the importance of maintaining proper documentation in each case file. Periodic staff meetings reinforce the need for accurate and complete documentation. Supervisors review individual case files to check for current and accurate information. In addition, a Quality Assurance Team is responsible for reviewing a random selection of new admissions files for completeness before they are forwarded to the Continued Occupancy Unit, and 5% of total tenant files are reviewed each year.”

**Auditor Comment:** Although HPD has implemented procedures to maintain complete files, this audit initially found 12 files out of 25 lacked 16 required documents. HPD subsequently submitted eight documents for eight of the files, leaving 4 of the 25 files (16%) lacking eight documents. Therefore, we reiterate our recommendation that HPD ensure that all necessary documents are included in the files, specifically those related to HAP contracts and that it adheres to all applicable HUD and HPD regulations and guidelines.

2. Determine whether the four files for which payments were made despite the lack of proper documentation are eligible for Section 8 subsidies, and if necessary, begin recoupment procedures.

**HPD Response:** “HPD has looked into the four files where payments were questionable.” HPD determined that “payments should not be recouped” for various reasons for each of these files.

**Auditor Comment:** Based on HPD’s response, it appears that HPD conducted a cursory review of the four files in question; however our review of these files found that HPD may not have followed its own regulations concerning annual inspections and maintaining HAP contracts in its files. HPD’s Administrative Plan, under the Housing Quality Standards section (F) Annual Inspections states: “HPD must conduct an HQS inspection of each unit under contract at least annually.” It continues, under the Lease and Housing Assistance Payment (HAP) Contract section (F) HAP Contracts: “The HAP contract may not be executed more than 60 days after commencement of the lease term and no payments will be made until the contract is executed.”

We did not find an executed HAP contract in three files or evidence that an annual inspection was conducted in one file. Therefore, we believe that it would be in HPD's best interest to revisit these four files and determine whether payments were appropriate and whether the clients were, in fact, eligible to receive Section 8 subsidies despite the lack of proper documentation.

June 16, 2009

John Graham  
Deputy Comptroller for Audits, Accountancy & Contracts  
Office of the New York City Comptroller  
1 Centre Street- Room 530 South  
New York, New York 10007-2341

Re: Response to the Follow-up Audit Report on HPD's Section 8 Housing Choice Voucher  
Program  
FS09-105F

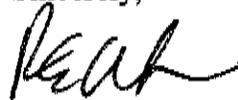
Dear Mr. Graham:

The following represents the Department of Housing Preservation and Development's Response to the findings and recommendations contained in the Audit on HPD's Section 8 Housing Choice Voucher Program  
FS09-105F

If you have any additional questions, please call Deputy Commissioner Bernard Schwarz at 863-6610.

Thank you.

Sincerely,



Rafael E. Cestero

Cc: Jeffrey Kay, Director, Mayor's Office of Operations  
Bernard Schwarz



STATUS REPORT AUDIT RESPONSE  
NEW YORK CITY COMPTROLLERS AUDIT  
NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT  
SECTION 8 HOUSING CHOICE VOUCHER PROGRAM 11/02-12/31/02  
REPORT PS09-105F

Findings	Recommendation	Response
#1	HPD should ensure that all necessary documents are included in the files, specifically those related to HAP contracts and that it adheres to all applicable HUD and HPD regulations and guidelines.	HPD will continue to track files through barcoding software. HPD has implemented a file reorganization procedure to ensure that documentation is complete. Each file contains checklists indicating what information is needed for the case so that missing documents can be readily identified, and noted. All staff members have received extensive training that stresses the importance of maintaining proper documentation in each case file. Periodic staff meetings reinforce the need for accurate and complete documentation. Supervisors review individual case files to check for current and accurate information. In addition, a Quality Assurance Team is responsible for reviewing a random selection of new admissions files for completeness before they are forwarded to the Continued Occupancy Unit, and 5% of total tenant files are reviewed each year.
#2	HPD should determine whether the four files for which payments were made despite the lack of proper documentation are eligible for Section 8 subsidies and if necessary, begin recoupment procedures.	The Department continues to strengthen operations with respect to HOS inspection by streamlining the inspection process and accelerating the time frame for correction of conditions. A new landlord self-certification process allows landlords to certify repairs to HOS violations. Certifications require tenant signature, and 25% are randomly verified through re-inspections. Landlords missing the deadline are identified by new reports so that their HAP can be abated by a team of case workers dedicated to this purpose. HOS staff has a scheduled "abatement week" in order to process all necessary abatements prior to the check-run.  HPD has looked into the four files where payments were questionable. HPD has made the following determinations:  File 1: Payments should not be recouped as the 11/27/2007 failure was a "no access"



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STATUS REPORT AUDIT RESPONSE  
NEW YORK CITY COMPTROLLERS AUDIT  
NEW YORK CITY DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT  
SECTION 8 HOUSING CHOICE VOUCHER PROGRAM 1/1/02-12/31/02  
REPORT PS09-105F

	<p>which is not the fault of the landlord. At the time, HPD required two consecutive failures in order to abate HAP Payments. Unit has since passed inspection.</p> <p>File 2: Payments should not be recouped. Tenant moved in 11/1/2002, even though the file is missing documents, there have been subsequent rent increases, rent reasonableness studies and lease renewals that verify that HAP payments are still warranted. In addition, the 4/12/2007 failed inspection was a "no access" which is not the fault of the landlord and thus does not warrant HAP Abatement. Unit has since passed inspection.</p> <p>File 3 &amp; 4: Payments should not be recouped. Both tenants moved in prior to 2006 (tenants moved in 2/1/2005 and 11/1/1998 respectively). Since then, HPD has strengthened its internal policies on folder maintenance including the creation of an Intake Checklist which ensures that all necessary documents (including the HAP Contracts) for admission into the Section 8 program are stored in the file prior to new admission. Even though both files have missing HAP Contracts, there have been subsequent rent increases, rent reasonableness studies and lease renewals that verify that HAP payments are still warranted.</p>
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