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BUREAU OF AUDIT

April 4, 2018

By Electronic Delivery

Commissioner Mitchell J. Silver, FPIA
New York City Department of Parks and Recreation
830 Fifth Avenue
New York, NY 10065

**Re: Letter Report on the New York City Department of Parks and Recreation's
Maintenance and Inspection of Its Playgrounds Located on New York City Housing
Authority Property
(Audit Number SR18-099AL)**

Dear Commissioner Silver:

This Letter Report presents the results of the New York City Comptroller's audit to determine whether the New York City Department of Parks and Recreation (Parks) is inspecting and maintaining its playgrounds in New York City Housing Authority (NYCHA) developments in a satisfactory condition.

Background

Parks is the steward of nearly 30,000 acres of land, including more than 5,000 individual properties ranging from Coney Island Beach and Central Park to community gardens and Greenstreets.¹ Parks is New York City's principal provider of recreational and athletic facilities and programs, operating athletic fields, playgrounds, basketball courts, tennis courts, public pools, recreational facilities, nature centers, golf courses, and beaches. Parks' mission is to plan resilient and sustainable parks, public spaces, and recreational amenities, build a park system for present and future generations, and care for parks and public spaces. Inspection teams assigned to the Parks Inspection Program (PIP), administered by the agency's Operations and Management Planning (OMP) division, use hand-held computers and digital cameras to perform nearly 5,000 PIP inspections each year, rating each inspected park as "acceptable" (A) or "unacceptable" (U) for overall condition and cleanliness. Parks' inspection calendar specifies four inspection seasons (Spring, Summer, Fall and Winter) beginning in early March and ending late February. Each season

¹ Greenstreets is the name of a Citywide program to convert paved, vacant traffic islands and medians into green spaces filled with shade trees, flowering trees, shrubs, and groundcover intended to capture stormwater.

consists of six inspection rounds, each typically of two weeks' duration, with 205 randomly-selected, ratable sites inspected in each round.²

Parks has a limited but important role with respect to the maintenance and inspection of playgrounds located in NYCHA developments: of the 822 playgrounds within and adjacent to NYCHA's residential developments across the five boroughs, Parks currently leases and manages 34 such playgrounds located on NYCHA property.³ This report concerns Parks' maintenance and inspection of those 34 sites. The 788 playgrounds under NYCHA's jurisdiction will be discussed in a separate report.

Audit Findings

The audit found that, overall, Parks satisfactorily maintains the playgrounds within and adjacent to NYCHA developments as required by the PIP. We inspected all 34 playgrounds on NYCHA property for which Parks is responsible and reviewed the related inspection reports created and maintained by Parks.⁴ Our inspections found that the playground structures, equipment, and grounds at 33 of the 34 playgrounds were maintained in satisfactory condition.⁵

As an illustration of the acceptable conditions that we observed, below is an overall view of Willis Playground, located at Mott Haven Houses in the Bronx (370 East 141st Street), which we visited on July 6, 2017. The playground had a play structure, fences, and paved surfaces with no structural deterioration, the safety surfacing was intact and the benches, including paint, were in good condition.



² Parks has designated three categories of ratable sites: (1) playgrounds and small parks; (2) large parks and large park zones; and (3) Greenstreets. Currently, there are more than 3,000 ratable sites citywide.

³ Playgrounds are defined as an outdoor area provided for children to play on and include areas identified by Parks as a park or playground.

⁴ The inspection reports reviewed covered the period from June 2016 through October 2017.

⁵ One of the 34 playgrounds we audited had not been inspected or maintained by Parks, and Parks officials stated that they believed, and were seeking supporting documentation, that NYCHA was responsible for its upkeep. That playground, known as the Vladeck Park playground, is discussed below.

However, our inspection found that one playground, Vladeck Park playground, located at 28 Jackson Street, Manhattan, was not maintained in a satisfactory manner. Our inspection of that playground, on June 2, 2017, found the climbing structure and benches had peeling paint and graffiti, as depicted in the following two photographs.



In addition, through our review of inspection reports, we found reports for 33 of the 34 playgrounds indicating that each was inspected at least twice per year; no inspection reports for the Vladeck Park playground were found. Our review showed that in the inspection reports posted on Parks' website, it noted unacceptable conditions found by its inspectors. In addition, Parks identified the condition of each playground as acceptable, unacceptable, or not rated, in three categories: cleanliness; landscape; and structural.⁶

Parks officials informed us that although the agency's website lists the Vladeck Park playground, which is situated within a NYCHA development, as a Parks-managed facility, Parks has not been inspecting and maintaining it. Parks officials informed us that they are now investigating whether the agency has an agreement with NYCHA that makes NYCHA responsible for inspecting and maintaining that playground. No further information has been provided by Parks. Accordingly, as of the date of this report, absent evidence to the contrary, we consider the Vladeck Park playground as one for which Parks is responsible, based on Parks having identified it as such on the agency's website.

Agency Response

In its response, Parks stated, "[w]e are pleased that your Report concluded that, overall, Parks satisfactorily maintains the playgrounds within and adjacent to NYCHA developments as required by the Parks Inspection Program (PIP). We are also pleased that your inspections and your review of our inspection reports found that the playground structures, equipment, and grounds at 33 of the 34 playgrounds on NYCHA grounds that are Parks properties were maintained in a satisfactory condition. With regard to Vladeck Park, while the site is a Parks property, the issue of its maintenance

⁶ Parks rates six structural features which include play equipment, paved surfaces, benches, fences, sidewalks, and safety surfacing as either acceptable, unacceptable, or not ratable.

jurisdiction was not entirely clear. Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward.”

Recommendations

- 1) Parks should continue to (a) inspect and maintain the playgrounds as required by the PIP; and (b) maintain bi-annual inspection reports for each playground site.

Parks Response: “Parks will continue to inspect and maintain the playgrounds as required by the PIP, as well as maintain bi-annual inspection reports for each playground site.”

- 2) Parks should enroll the playground in Vladeck Park in its inspection program and maintain biannual inspection reports for it.

Parks Response: “Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward.”

- 3) Parks should repair and refurbish the playground structures in Vladeck Park in accordance with its regular standards for playgrounds.

Parks Response: “Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward.”

Audit 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 audit covered the period of July 1, 2016 through October 31, 2017. Our audit tested all 34 Parks playgrounds that were located on NYCHA property.

We obtained a list of playgrounds and parks located on NYCHA property that Parks is responsible for managing to determine the extent of Parks’ responsibility pertaining to playgrounds on NYCHA property. The list contained 34 playgrounds located at NYCHA developments for which Parks is responsible, which includes the maintenance, inspection and repair of any play equipment. To determine the reliability of the list of playgrounds managed by Parks on NYCHA property, we visited 316 NYCHA developments. During the observations, which were conducted from June 8, 2017 through July 25, 2017, we inspected playgrounds and play equipment for imminent danger, missing or broken equipment, safety surface irregularities, overgrown vegetation, chipping paint or broken benches, litter, graffiti, and clogged or inadequate drainage.

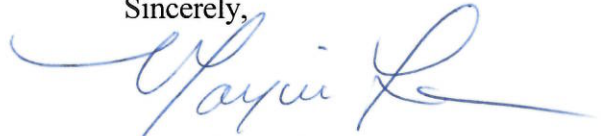
To achieve our audit objective, we developed an observation package, using the inspection checklist used by Parks to inspect its playgrounds, to assist us when visiting each of the playgrounds’ development locations. The observation package enabled our auditors to identify conditions that are acceptable or unacceptable in accordance with Parks’ PIP requirements. The package included an

observation maintenance checklist to document the playground name, location, and conditions seen at each site. The package also included a copy of NYCHA development maps to be used by auditors to establish the location and layout of each Parks' playground within each development. We took photos to document any acceptable or unacceptable conditions at each site. We also obtained and reviewed all available Parks' inspection reports dated from June 2016 through October 2017 for 33 of the 34 Parks playgrounds located on NYCHA property.

The findings in this letter report were discussed with Parks officials during and at the conclusion of this audit. The preliminary draft letter report was sent to Parks officials and was discussed at an exit conference held on February 14, 2018. Discussions with Parks officials were considered in preparation of a draft letter report. On February 27, 2018, we submitted a draft letter report with a request for comments. We received a written response from Parks officials on March 12, 2018. In its response, Parks agreed with the report findings and stated that in regards to Vladeck Park playground "Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward."

The full text of Parks' response is included as an addendum to this letter report.

Sincerely,



Marjorie Landa

c: David Cerron, Revenue/OMD, Department of Parks and Recreation
Dean Fuleihan, First Deputy Mayor
Melanie Hartzog, Budget Director, Office of Management and Budget
Emily Newman, Acting Director, Mayor's Office of Operations
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March 13, 2018

Marjorie Landa
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New York, NY 10007

Re: Draft Letter Report on the New York City Department of Parks and Recreation's Maintenance and Inspection of Its Playgrounds Located on New York City Housing Authority Property (Audit Number SR18-099AL)

Dear Deputy Comptroller Landa:

This letter addresses the findings and recommendations contained in the New York City Comptroller's Draft Letter Report ("Report"), dated February 27, 2018, on the above subject matter.

We are pleased that your Report concluded that, overall, Parks satisfactorily maintains the playgrounds within and adjacent to NYCHA developments as required by the Parks Inspection Program (PIP). We are also pleased that your inspections and your review of our inspection reports found that the playground structures, equipment, and grounds at 33 of the 34 playgrounds on NYCHA grounds that are Parks properties were maintained in a satisfactory condition. With regard to Vladeck Park, while the site is a Parks property, the issue of its maintenance jurisdiction was not entirely clear. Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward.

In reference to the Report's recommendations:

Recommendation 1: Parks should continue to (a) inspect and maintain the playgrounds as required by the PIP; and (b) maintain bi-annual inspection reports for each playground site.

Parks will continue to inspect and maintain the playgrounds as required by the PIP, as well as maintain bi-annual inspection reports for each playground site.

Recommendation 2: Parks should enroll the playground in Vladeck Park in its inspection program and maintain bi-annual inspection reports for it.

Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward.

Recommendation 3: Parks should repair and refurbish the playground structures in Vladeck Park in accordance with its regular standards for playgrounds.

Parks is reaching out to NYCHA to coordinate maintenance inspections moving forward.

Finally, Parks wishes to thank you and your audit staff for the time and effort devoted to completing this Report.

Sincerely,

Liam Kavanagh
First Deputy Commissioner