

AUDIT REPORT

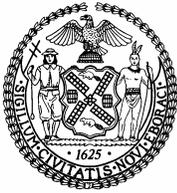


CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
BUREAU OF MANAGEMENT AUDIT
WILLIAM C. THOMPSON, JR., COMPTROLLER

Audit Report on the Department of Sanitation Vacant Lot Clean-up Program

ME08-064A

June 30, 2008



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 conducted an audit to determine whether the New York City Department of Sanitation (DSNY) adequately responds to complaints and work orders regarding unclean vacant lots.

Vacant lots are identified for cleaning through complaints from residents, Community Boards, and elected officials, as well as through the field observations of DSNY personnel. Under the Vacant Lot Clean-up Program, DSNY's Lot Cleaning Division cuts weeds and removes debris and bulky items from City- and privately-owned vacant lots in the five boroughs. We audit programs such as this to ensure that City agencies efficiently and effectively meet their program objectives.

The results of our audit, which are presented in this report, have been discussed with DSNY 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 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/ec

Report: ME08-064A
Filed: June 30, 2008

Table of Contents

AUDIT REPORT IN BRIEF 1

 Audit Findings and Conclusions..... 1

 Audit Recommendations..... 2

 DSNY Response 2

INTRODUCTION..... 3

 Background..... 3

 Objective..... 4

 Scope and Methodology 5

 Discussion of Audit Results..... 7

FINDINGS AND RECOMMENDATIONS 8

 DSNY Vacant Lot Cleaning Program Had Inadequate Internal Controls 8

 Recommendations..... 13

 LCD Cases Open as of November 2007 Had Been Open in PowerBuilder, on Average, for
 More Than Three Years 14

 Recommendations..... 17

 DSNY Lacked Time Standards for Resolving Vacant Lot Complaints and Field-Generated
 Work Orders..... 17

 Recommendation 19

APPENDIX

ADDENDUM DSNY Response

The City of New York
Office of the Comptroller
Bureau of Management Audit

**Audit Report on the
Department of Sanitation
Vacant Lot Clean-up Program**

ME08-064A

AUDIT REPORT IN BRIEF

This audit determined whether the New York City Department of Sanitation (DSNY) adequately responded to complaints and work orders regarding unclean vacant lots. Vacant lots are identified for cleaning through complaints from residents, Community Boards, and elected officials, as well as through the field observations of DSNY personnel. Under the Vacant Lot Clean-up Program, DSNY's Lot Cleaning Division (LCD) cuts weeds and removes debris and bulky items from City- and privately-owned vacant lots in the five boroughs. For Fiscal Year 2007, DSNY reported that it cleaned 6,191 vacant lots. Of these, 4,941 were City-owned and 1,250 were privately-owned.

Audit Findings and Conclusions

The audit revealed that the DSNY Vacant Lot Clean-up Program had inadequate internal controls over the way it identified vacant lots for cleaning, processed complaints and work orders on vacant lots, and managed the cleaning of the lots. In terms of identifying lots for cleaning and managing cleaning operations, there was a lack of segregation of duties and a lack of proper supervision. Field supervisors had near-total control in determining whether a lot was clean or dirty and, if dirty, the resources that were to be used to clean it. As a result, LCD resources appear to have been used inefficiently. In addition, the inadequate internal controls increased the possibility that LCD resources could have been used for purposes contrary to their intended use.

In terms of LCD's processing of complaints and work orders on vacant lots, our review found 1,800 cases that had been opened prior to July 1, 2007, and were still open as of November 2, 2007. These cases had been open in LCD's PowerBuilder system for an average of more than three years. The audit concluded that, until recently, LCD had not been effectively using its PowerBuilder system to track its aging cases. Furthermore, DSNY does not have written time standards for resolving complaints. For those lots that were cleaned in Fiscal Year 2007, it took LCD an average of 43 days to process and clean a vacant lot after the initial inspection to determine whether the lot needed cleaning. The average was better for complaints

generated through the City's 311 system. For these complaints, DSNY took an average of 35 days to clean the lots.

Audit Recommendations

To address these issues, the audit recommends, among other things, that DSNY:

- Prepare and implement written procedures to ensure that field supervisors' functions and duties are properly segregated and supervised.
- Provide for independent verifications of field-supervisor-generated work orders by requiring photographs of all inspected lots for review by district superintendents or the Lot Inspection Unit (LIU).
- Ensure that district superintendents or LIU conduct sample inspections to verify the validity of field-generated work orders.
- Ensure that district superintendents review field supervisors' plans for assigning resources to clean specific lots.
- Require photographs be taken of cleaned lots for review by the district superintendent.
- Continue to expand use of PowerBuilder's tracking reports to identify aging cases.
- Continue to expand efforts to research aging cases to determine why they remain open and take the necessary actions to resolve them.
- Develop written time standards for handling vacant lot complaints and field-generated work orders.

DSNY Response

In its response, DSNY generally agreed with eight recommendations and stated that it would take one recommendation under advisement.

INTRODUCTION

Background

The New York City Department of Sanitation (DSNY) endeavors to promote a healthy environment through the sound management of solid waste. According to DSNY, the department collects over 12,000 tons of residential and institutional refuse and recyclables each day. It is also responsible for cleaning City streets and for clearing the snow and ice from City roadways. In addition, the agency cleans about 6,000 vacant lots per year.

Vacant lots are identified for cleaning through complaints from residents, Community Boards, and elected officials, as well as through the field observations of DSNY personnel. Under the Vacant Lot Clean-up Program, DSNY's Lot Cleaning Division (LCD) cuts weeds and removes debris and bulky items from City- and privately-owned vacant lots in the five boroughs.

LCD's Field Operations Unit has six field garages located throughout the City—two in Queens and one each in Manhattan, Brooklyn, the Bronx, and Staten Island. The unit has a staff of 23 field supervisors who oversee 127 uniformed sanitation workers and 10 civilian workers who work on lot cleaning crews. Supervisors report to three district superintendents. One district superintendent oversees lot cleaning efforts in Manhattan and the Bronx, while the other two oversee work done in Brooklyn, Queens, and Staten Island.

The majority of LCD's funding is provided by the federal Department of Housing and Urban Development (HUD) through its Community Development Block Grants (CDBG) program. The block grants support the cleaning of vacant lots in CDBG-eligible areas (defined as areas where at least 51 percent of the residents are of low or moderate income).

The vacant lot cleaning process begins when a complaint or a field-generated work order is forwarded to LCD's Lot Inspection Unit (LIU) for processing. An LIU clerk enters the complaint or order information in LCD's PowerBuilder system, including the address of the lot to be cleaned, and assigns a Central Correspondence Unit (CCU) tracking number. For complaints, an LIU lot inspector inspects the vacant lot site to determine whether the site needs cleaning. (LIU inspectors do not inspect lots for which field-generated work orders have been received from the Field Operations Unit.)

Unclean lots include those that have abandoned vehicles, abandoned appliances, lumber on the ground, construction debris, unkempt fences and walls, 12-inch high weeds and grass, unkempt shrubbery, or garbage and discarded food not kept in rodent-proof containers. According to LCD criteria, private lots are not to be cleaned by LCD if there is a structure on the lot, unless cleaning around the structure is requested by the Department of Health and Mental Hygiene (DOHMH), and community gardens are not to be cleaned by LCD unless the cleaning is requested by a GreenThumb organization.¹ In addition, active construction sites are not to be

¹ The Parks and Recreation Department's community gardens program operates under the auspices of the GreenThumb organization. The organization supports about 450 registered gardens in the City.

cleaned by LCD, and wetlands should only be cleaned by LCD with the approval of the State Department of Environmental Conservation. If the LIU inspector determines that the lot does not need cleaning by LCD, the inspector notes the disposition status, and LIU staff close out the case. If the lot needs cleaning, LIU staff generate a Work Performance Report (DS866) with information on the location and size of the lot and the type of refuse on it. LIU also prepares DS866s for field-generated work orders and forwards all DS866s to the Intake Research Unit (Intake) for further processing.

Intake researches the complaint or work order to determine the block and lot numbers and the owner(s) of the property. Duplicate complaints or orders on the same vacant lot are not processed while the original complaint remains open. If a dirty lot is City-owned, Intake instructs Field Operations to clean the lot, and field supervisors schedule the cleaning.

If a dirty lot is privately-owned, Intake requests DOHMH to issue “a five-day letter.” The five-day letter is a Notice of Violation (NOV) sent to the owner(s) of the lot stating that the dirty lot poses a public health hazard. The NOV, which provides five days for mailing and five days for cleaning, gives the owner(s) a total of ten days from the date of the NOV to clean the lot. DOHMH mails the NOV to all owners of record and sends a copy to Intake. Intake then instructs Field Operations to inspect the privately-owned lot.

After the period for the owner to clean the lot has elapsed, a Field Operations supervisor inspects the lot to determine whether it has been cleaned by the owner and, if not, whether cleaning crews would be able to access the property. If the lot is determined to be dirty and accessible, the field supervisor estimates the amount of labor and equipment necessary to clean the lot and schedules the cleaning. If the lot is determined to be dirty and inaccessible, the case is forwarded to LCD’s Access Warrant Unit for legal action. The process of gaining access to private property is known as the Fenced and Locked Procedure (FLP). Through FLP, the Access Warrant Unit, with the assistance of the City Law Department, attempts to obtain an access order from a New York State Supreme Court judge that authorizes LCD workers to enter the private lot and clean it.

For Fiscal Year 2007, DSNY reported that it cleaned 6,191 vacant lots. Of these, 4,941 were City-owned and 1,250 were privately-owned. During Fiscal Year 2006, HUD provided \$14,848,664 (76%) and the City provided \$4,814,429 (24%) of LCD’s total funding of \$19,663,093.

Objective

The objective of this audit was to determine whether DSNY adequately responds to complaints and work orders regarding unclean vacant lots.

Scope and Methodology

The scope period covered by this audit was July 1, 2006, through March 31, 2008.

To gain an understanding of LCD policies, procedures, and practices, we interviewed the Assistant Chief of the LCD, the Deputy Chief of Operations, the Director of Administration, the Director of LIU, the Supervisor of Intake, the Legal Liaison Manager of the Access Warrants Unit, and the Director of the Management Information System Unit. We also conducted walkthroughs of LCD divisions, including LIU, Intake, Field Operations, and the Access Warrant, Statistics, Billing, and Contested Billing units.

To determine the accuracy of work orders generated by field supervisors, we judgmentally selected 76 lot inspections that were conducted by field supervisors between January 11 and 18, 2008, in the Bronx, Brooklyn, and Manhattan. We visited the 76 vacant lots between January 24 and February 1, 2008, and determined whether the field supervisors' identifications of these lots as being in need of cleaning by LCD were accurate.

To determine whether Field Operations supervisors' reinspection reports² were accurate and whether lot cleanings were completed, we physically reviewed work performed by randomly selected field supervisors and their crews at vacant lots that were identified on DS866s and related documents prepared in Brooklyn and Queens on November 26 and 27, 2007, and in Manhattan on December 3 and 4, 2007. Between November 29 and December 6, 2007, we visited 27 of the 30 identified vacant lots and compared our observations to the 8 lot reinspections and 19 lot cleanings noted on the DS866s and related documents.

To determine whether LCD is adequately responding in a timely manner to complaints and field-generated work orders on vacant lots, we obtained four population lists from LCD's PowerBuilder system and randomly selected sample complaints and work orders from these populations. Table I, below, identifies each population and the associated sample size.

² After NOVs and access orders have been issued, and before lots are scheduled for cleaning, field supervisors conduct reinspections to determine whether the lots are still dirty or inaccessible. Reinspections differ from those inspections performed by field supervisors by which lots are initially identified as being in need of cleaning. These initial inspections are the primary source of field-generated work orders.

Table I
Populations of Complaints and Work Orders
And Associated Sample Sizes

	Population	Population Size	Sample Size
1.	Cases that Originated during Fiscal Year 2007	7,464	25
2.	Cases that Originated prior to Fiscal Year 2007, Were Open as of July 1, 2006, and Had Some Activity during Fiscal Year 2007	693	25
3.	Cases that Originated between January 2004 and June 2006, Were Open as of July 1, 2006, and Had No Activity during Fiscal Year 2007	1,127	25
4.	Non-FLP Cases* that Originated prior to January 2004, Were Open as of July 1, 2006, and Had No Activity during Fiscal Year 2007	327	10
	Totals	9,611	85

*We selected January 1, 2004 as a cut-off date for FLP cases because LCD officials explained that in November 2003 the DOHMH Commissioner began to issue Affirmations in Support of Application to Obtain Access Order by which LCD was much better able to obtain access orders from State Supreme Courts in fenced and locked situations involving private lots.

Therefore, a total of 85 cases were selected for review from four separate populations totaling 9,611 cases.

Because DSNY could not locate the case files for the sample cases in the fourth population until our fieldwork was completed on April 21, 2008, the reliability of selected PowerBuilder system data was only assessed for the first three populations. We do not consider this lack of access to information to have materially affected our tests of data reliability since the fourth category represents only three percent of our audit population. We randomly selected a sample of 25 cases from each of these three populations, for a total of 75 of the 9,284 cases that either were opened since January 1, 2004, and were still open as of July 1, 2006, or were opened in Fiscal Year 2007. For the 75 cases, we compared PowerBuilder data (including tracking numbers, initial inspection dates, and work completion dates) to the information in hard-copy files to determine whether information matched. Information in a separate randomly selected sample of 59 hard-copy case files (one per Sanitation District) was compared to PowerBuilder data.

To determine how many cases in the four populations shown in Table I were still open as of November 2, 2007, we reviewed PowerBuilder data. We also reviewed PowerBuilder data to determine how long these cases had remained open and unresolved.

To determine how long it took LCD to resolve complaints and field-generated work orders, we obtained from PowerBuilder a list of the 6,191 lots that were cleaned during Fiscal Year 2007. For these cases, we separated those lots that were cleaned due to complaints received

through the 311 system and those that were cleaned due to written complaints or field-generated work orders. We then compared the dates that the vacant lots were initially inspected to the dates that the lots were cleaned.

The results of our tests of the samples noted above, while not statistically projected to their respective populations, provide us with a reasonable basis to help us determine whether DSNY adequately responded to complaints and work orders regarding unclean vacant lots.

This audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of records and other auditing procedures considered necessary. This audit was performed in accordance with the audit responsibilities of the City Comptroller, as set forth in Chapter 5, §93, of the New York City Charter.

Discussion of Audit Results

The matters in this report were discussed with DSNY officials during and at the conclusion of this audit. A preliminary draft report was sent to DSNY officials on May 6, 2008, and was discussed at an exit conference held on May 30, 2008. We submitted a draft report to DSNY officials on June 9, 2008 with a request for comments. We received a written response from DSNY officials on June 25, 2008. In its response, DSNY agreed with eight recommendations and stated that it would take one recommendation under advisement. DSNY stated: “At a time when every City agency is being asked to do more with less, we appreciate your office’s efforts to help us improve our lot cleaning operation.”

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

FINDINGS AND RECOMMENDATIONS

Our audit revealed that the DSNY Vacant Lot Clean-up Program had inadequate internal controls over the way it identified vacant lots for cleaning, processed complaints and work orders on vacant lots, and managed the cleaning of the lots. In terms of identifying lots for cleaning and managing cleaning operations, there was a lack of segregation of duties and a lack of proper supervision. Field supervisors had near-total control in determining whether a lot was clean or dirty and, if dirty, the resources that were to be used to clean it. As a result, LCD resources appear to have been used inefficiently. In addition, the inadequate internal controls increased the possibility that LCD resources could have been used for purposes contrary to their intended use.

In terms of its processing of complaints and work orders on vacant lots, our review found 1,800 cases that had been opened prior to July 1, 2007, and were still open as of November 2, 2007. These cases had been open in PowerBuilder for an average of more than three years. Some of the delays could be attributed to LCD not ensuring that the information it provided to DOHMH for the preparation and distribution of NOV's was accurate and complete. Improperly completed and distributed NOV's can delay the process of obtaining access orders from the courts. In addition, until recently LCD management had not been effectively using its PowerBuilder system to track its aging cases. Furthermore, DSNY does not have written time standards for resolving complaints. For those lots that were cleaned in Fiscal Year 2007, it took LCD an average of 43 days to process and clean a vacant lot after the initial inspection to determine whether the lot needed cleaning. The average was better for complaints generated through the City's 311 system. For these complaints, DSNY took an average of 35 days to clean the lots.

Throughout the course of this audit LCD management has been very responsive to our audit findings and has taken several steps to address the concerns that we brought to its attention. These steps include, among other things, an enhanced use of PowerBuilder to track cases and the provision of training to Intake staff to improve the accuracy of the information provided to DOHMH for the preparation of NOV's.

DSNY Vacant Lot Cleaning Program Had Inadequate Internal Controls

Our audit revealed that the DSNY Vacant Lot Clean-up Program had inadequate internal controls over the way it identified lots for cleaning and managed the cleaning of the lots. As a result, LCD resources appear to have been used inefficiently. In addition, the inadequate internal controls increased the possibility that LCD resources could have been used for purposes contrary to their intended use.

There has been a lack of segregation of duties and a lack of proper supervision in the Field Operations Unit. Field supervisors have had near-total control in determining (1) whether a lot is clean or dirty and (2) the resources required to clean it. For complaints, field supervisors visit lots just before scheduling a cleaning to ensure that a lot still needs cleaning and to

determine the resources needed. For these cases, an LIU inspector had previously visited the lot to confirm that it was dirty. For field-generated work orders, however, field supervisors identify the lots to be cleaned, visit the lots again just before cleaning to confirm that the lots are still dirty, and then plan the cleaning. No independent LIU inspector visits these lots. Therefore, there is no independent verification that a lot needs to be cleaned or that a certain level of resources is needed to clean it.

There is little evidence that anyone reviews field-supervisor-generated work orders to determine whether the work is really necessary and whether the planned use of resources is appropriate for the scheduled work. These weak controls appear to result in work orders being generated unnecessarily and lots possibly being cleaned when they did not need to be cleaned. This raises some questions as to the legitimacy of LCD's work orders and lot cleaning work.

We reviewed 76 field-generated inspections reports that were prepared by field supervisors between January 11 and 18, 2008, in the Bronx, Brooklyn, and Manhattan. Of these 76 inspections, 19 were for vacant lots in the Bronx, 17 for lots in Brooklyn, and 40 for lots in Manhattan. Seventy-four of the lots were City-owned, and two were privately-owned. The field supervisors indicated that all the lots had weeds or litter, and were in need of cleaning.

To verify the accuracy of the 76 inspections, we visited these sites between January 24 and February 1, 2008. Our observations, made between 6 and 8 days after each inspection in Manhattan, and between 18 and 20 days after each inspection in Brooklyn and the Bronx, yielded different conclusions than those of the field supervisors. Thirty-one (41%) of the 76 lots visited by the auditors were found to be clean. Of the 31 lots, 25 were in Manhattan, 4 in the Bronx, and 2 in Brooklyn. Table II, below, identifies the 31 sites.

Table II
Vacant Lot Sites that Field Supervisors
Identified as Dirty, But Auditors Found Clean

			Field Supervisor's Work Order (DS866)		Auditors' Observation of Vacant Lot	
	Borough	CCU #	Inspection Report Date	Lot Condition	Observation Date	Lot Condition
1.	Bronx	08-5314	1/11/2008	Weeds/Litter	1/31/2008	Clean
2.	Bronx	08-5316	1/11/2008	Weeds/Litter	1/31/2008	Clean
3.	Bronx	08-5318	1/11/2008	Weeds/Litter	1/31/2008	Clean
4.	Bronx	08-5319	1/11/2008	Weeds/Litter	1/31/2008	Clean
5.	Brooklyn	08-5353	1/14/2008	Litter	2/1/2008	Clean
6.	Brooklyn	08-5356	1/14/2008	Litter	2/1/2008	Clean
7.	Manhattan	08-5495	1/17/2008	Weeds/Litter	1/25/2008	Clean
8.	Manhattan	08-5503	1/17/2008	Weeds/Litter	1/25/2008	Clean
9.	Manhattan	08-5504	1/17/2008	Weeds/Litter	1/25/2008	Clean
10.	Manhattan	08-5505	1/17/2008	Weeds/Litter	1/25/2008	Clean
11.	Manhattan	08-5445	1/18/2008	Weeds/Litter	1/24/2008	Clean
12.	Manhattan	08-5446	1/18/2008	Weeds/Litter	1/24/2008	Clean
13.	Manhattan	08-5447	1/18/2008	Weeds/Litter	1/24/2008	Clean
14.	Manhattan	08-5449	1/18/2008	Weeds/Litter	1/24/2008	Clean
15.	Manhattan	08-5462	1/18/2008	Weeds/Litter	1/24/2008	Clean
16.	Manhattan	08-5463	1/18/2008	Weeds/Litter	1/24/2008	Clean
17.	Manhattan	08-5464	1/18/2008	Weeds/Litter	1/24/2008	Clean
18.	Manhattan	08-5483	1/18/2008	Weeds/Litter	1/24/2008	Clean
19.	Manhattan	08-5484	1/18/2008	Weeds/Litter	1/24/2008	Clean
20.	Manhattan	08-5485	1/18/2008	Weeds/Litter	1/24/2008	Clean
21.	Manhattan	08-5486	1/18/2008	Weeds/Litter	1/24/2008	Clean
22.	Manhattan	08-5489	1/18/2008	Weeds/Litter	1/24/2008	Clean
23.	Manhattan	08-5490	1/18/2008	Weeds/Litter	1/24/2008	Clean
24.	Manhattan	08-5491	1/18/2008	Weeds/Litter	1/24/2008	Clean
25.	Manhattan	08-5452	1/18/2008	Weeds/Litter	1/25/2008	Clean
26.	Manhattan	08-5454	1/18/2008	Weeds/Litter	1/25/2008	Clean
27.	Manhattan	08-5458	1/18/2008	Weeds/Litter	1/25/2008	Clean
28.	Manhattan	08-5460	1/18/2008	Weeds/Litter	1/25/2008	Clean
29.	Manhattan	08-5492	1/18/2008	Weeds/Litter	1/25/2008	Clean
30.	Manhattan	08-5494	1/18/2008	Weeds/Litter	1/25/2008	Clean
31.	Manhattan	08-5496	1/18/2008	Weeds/Litter	1/25/2008	Clean

All 31 lots were reportedly cleaned by LCD crews subsequent to our observations that they were already clean. In addition, one of the 31 lots was an active construction site and may not have even qualified as a vacant lot under LCD criteria.

We are further troubled by the fact that DSNY paid dumping fees for the refuse reportedly collected at 13 of these 31 lots. For 4 of the 13 lots, LCD paid dumping fees for disposing of more than one ton of refuse, ranging from 2.07 to 16.38 tons. (Photographs

documenting our observations at these four lots are shown in Appendix I.) We seriously question that this refuse came from these 13 lots, as field supervisors reported on their DS866s.

DSNY officials state that some of the refuse may have been dumped on the lots after our observations and before the LCD cleanings. LCD cleanings at these four lots occurred, on average, about 40 days after our January 31, 2008 observations. The real issue, however, is that our auditors found lots to be clean shortly after DSNY inspectors indicated that the lots contained refuse and needed to be cleaned. DSNY officials also stated that some of the refuse may have been collected near the four lots and were included in the amounts reported as having been collected at these lots. Although these explanations may account for some of the refuse reportedly collected at these lots, the high tonnage amounts reportedly collected at these sites raise questions as to whether all of this refuse was in fact collected at these locations. The weak internal controls in place at the time of these cleanings increase the possibility that LCD resources could have been used inappropriately.

DSNY Response: In its written response to the draft report, DSNY referred to cleaning efforts near lots scheduled for cleaning as “unscheduled cleanings” and stated: “Prior to this audit, the crews were not required to document and quantify these unscheduled cleanings. We will now make it a requirement to track the time spent on these cleanings and estimate the amount of debris removed.”

Auditor Comment: As is stated elsewhere in its response to the recommendations of the draft report, DSNY will now require that field supervisors take photographs of scheduled cleanings before and after the cleanings take place. DSNY should also now require that field supervisors take photographs of unscheduled cleanings before and after such cleanings occur. This would better enable management to ensure that resources are being used efficiently and appropriately.

Furthermore, even for the 45 (of the 76) lots that needed cleaning, LCD supervisors occasionally assigned more labor and equipment than necessary to clean them. Of the 45 lots, 7 were determined to be ineligible by Intake, 1 was inaccessible, and 37 were reportedly cleaned by LCD. We reviewed the work orders for the 37 lots and found two clear instances in which the size of the cleaned lot did not justify the amount of labor used.

- A work order (CCU #08-5345) for a vacant lot located on Stanhope Street in Brooklyn indicated that the dirty lot was 21' wide by 100' long (2,100 square feet). A crew of five to seven workers was assigned each day for seven workdays in March 2008 to clean this lot. Each crew member worked between 5½ and 6½ hours each day on what was described on the work order as “groundwork,” which primarily involves the cutting of high grass and weeds.
- A work order (CCU #08-5349) for a vacant lot located on DeKalb Avenue in Brooklyn indicated that the dirty lot was approximately 27' wide by 68' long (approximately 1,836 square feet). A crew of seven workers was assigned to work

between 5½ and 6½ hours each day for three days in March 2008 to do “groundwork” on this lot.

Of the 37 lots, 7 were of comparable size to these two lots, ranging in size from approximately 1,800 to 2,500 square feet. An average of 22.5 work hours was reportedly expended in the cleaning of these seven lots, ranging from 9 to 32.5 work hours. However, 246 work hours were reportedly expended in the cleaning of the Stanhope Street lot, and 119 work hours were reportedly expended in the cleaning of the DeKalb Avenue lot. When we presented these two cases to LCD officials, they agreed that the assigning of workers to these lots appeared to be excessive.

DSNY Response: “The Department has carefully reviewed these cases and determined that these lots were dirty on the dates they were cleaned. In certain instances, given the immediate availability of property location information, occasionally it is necessary to utilize the numbers of adjacent lots to record work performed in surrounding areas and on the street/sidewalk fronting the properties. After a preliminary review of the photos provided by the auditors, LCD officials agreed that worker assignments seemed excessive. However, based upon a thorough investigation with respect to these sites, the LCD Unit determined the following:

- “CCU #08-5345/Stanhope Street - Five Community Associates/Assistants with one S/W Collection Truck were assigned to clear this property as stated. This lot rolls uphill from the street and there is a fence 93 feet back. At the time of cleaning there was debris five feet high hidden from view. Hand crews peeled the fence back and performed clearing activities. The debris was bagged at the rear of the property and walked through the lot to the collection truck. The crew also worked along the block face into the street cleaning perimeters on both sides of Stanhope Street.
- “CCU #08-5349/DeKalb Avenue - A crew of seven Community Assistants/Associates worked on this lot from Thursday, 3/13/08 through Monday, 3/17/08. There was debris at the back of the lot behind a car. This crew walked all material off the lot. Additionally, the crew cleaned the lot’s perimeters -- debris along the block face going toward Myrtle Avenue, including the police lot, and the street on both sides of DeKalb Avenue. All of the labor and collected debris was associated with this work order.

“Based on these relevant factors, we have determined that the appropriate resources were assigned to clean these properties.”

Auditor Comment: DSNY provided no evidence to support its description of these debris conditions. In addition, although DSNY may account for some of the resources used at these lots, the high resource usage at these locations raises questions as to whether all of these resources were used efficiently and appropriately.

The use of resources in the cleaning of lots could be improved if DSNY established better internal controls over the way LCD manages the cleaning of vacant lots. For example, photographs taken during initial inspections and reinspections of lots would provide district superintendents with valuable information that would help them review field supervisors' plans for assigning cleaning resources. This could help ensure that the cleaning is done as efficiently as possible. Similarly, photographs of the lots after they have been cleaned could be taken to provide evidence to the district superintendents that the planned work was in fact done.

Seen in the best light, the use of LCD resources to clean a lot that is already clean is a waste of City resources, as is the assigning of excessive resources to clean a lot. Of real concern, however, is the fact that due to inadequate management controls, there is an increased possibility that resources were used for purposes contrary to their intended use.

Recommendations

DSNY should:

1. Prepare and implement written procedures to ensure that field supervisors' functions and duties are properly segregated and supervised.

DSNY Response: "The Department believes that it is not necessary to segregate the responsibilities of the field supervisors and believes that its current procedures already satisfy this recommendation. Field Supervisors are the most qualified to perform this activity and are held responsible to ensure that lots within their assigned districts are properly cleaned. Additionally, the Field Supervisor overseeing a particular work area (district) is most familiar with the lots, including trends and patterns of how often the lots need cleaning. We are not opposed to the LIU inspecting all lots, however, a substantial portion of inspections are complaint-generated, and do not necessarily lead to eligible work. District Superintendents will have overall say on field lot cleaning operations. As a result of this audit, the Deputy Chief of lot cleaning will explore the possibility of enhancing the standards, goals and monitoring of the field operations. The Department will continue to review LCD operations as well as worker supervision. ... As suggested, Field Supervisors are presently taking photos of their lot inspections for review by District Superintendents. ... The District Superintendent and the Lot Inspection Unit Supervisor will spot check a sample of field-generated work orders to ensure their validity. ... District superintendents can randomly monitor resource allocations by spot-inspecting locations prior to work."

Auditor Comment: We are pleased that DSNY plans to have district superintendents and the LIU supervisor spot check field supervisors' identifications of lots for cleaning and to have district superintendents review field supervisors' lot inspection photographs and randomly monitor field supervisors' cleaning resource allocations. These steps go a long way towards addressing our concerns relative to the need to effectively monitor the lot cleaning decisions of field supervisors.

2. Provide for independent verifications of field-supervisor-generated work orders by requiring photographs of all inspected lots for review by district superintendents or LIU.

DSNY Response: “As suggested, Field Supervisors are presently taking photos of their lot inspections for review by District Superintendents.”

3. Ensure that district superintendents or LIU conduct sample inspections to verify the validity of field-generated work orders.

DSNY Response: “The District Superintendent and the Lot Inspection Unit Supervisor will spot check a sample of field-generated work orders to ensure their validity. These spot checks will be documented.”

4. Ensure that district superintendents review field supervisors’ plans for assigning resources to clean specific lots.

DSNY Response: “The Department agrees with this recommendation. However, due to the overall workload and widespread areas of responsibility, District Superintendents can randomly monitor resource allocations by spot-inspecting locations prior to work. The Deputy Chief of Lot Cleaning will explore enhancing the standards, goals, and monitoring of the field operations. The Deputy Chief of Lot Cleaning will report to the Assistant Chief of Lot Cleaning on a weekly basis to resolve any findings.”

5. Require photographs be taken of cleaned lots for review by the district superintendent.

DSNY Response: “This operation is now in effect.”

LCD Cases Open as of November 2007 Had Been Open in PowerBuilder, on Average, for More Than Three Years

Of the 9,611 cases in our four populations, 1,800 had been open in PowerBuilder, on average, for more than three years as of November 2, 2007. Table III, below, shows the four populations, the number of cases open as of November 2, 2007, and the average number of days those cases had been open.

Table III
Open Complaints and Work Orders
From Four Populations
As of November 2, 2007

	Population	Population Size	Cases Still Open as of 11/02/07	Average Number of Days Open
1.	Cases that Originated during Fiscal Year 2007 (July 1, 2006 to June 30, 2007)	7,464	332	326
2.	Cases that Originated prior to Fiscal Year 2007, Were Open as of July 1, 2006, and Had Some Activity during Fiscal Year 2007	693	35	650
3.	Cases that Originated between January 2004 and June 2006, Were Open as of July 1, 2006, and Had No Activity during Fiscal Year 2007	1,127	1,120	999
4.	Non-FLP Cases that Originated prior to January 2004, Were Open as of July 1, 2006, and Had No Activity during Fiscal Year 2007	327	313	2,554
	Totals (Weighted Average)	9,611	1,800	1,138

As shown in Table III, the 1,800 cases from the four populations that were still open as of November 2, 2007, had been open for an average of 1,138 days—or for more than three years.

Many of these open cases were privately-owned lots to which LCD could not gain access because they were fenced and locked. Of the 1,800 cases that were still open, 1,331 (74%) were FLP cases (opened since January 1, 2004) that required LCD to take legal action to gain access to the vacant lot. These cases had been open for an average of 862 days. The 156 (9%) non-FLP cases opened since January 1, 2004, had been open an average of 659 days. (As shown in Table III, the 313 [17%] non-FLP cases opened prior to January 1, 2004, had been open an average of 2,554 days.)

To gain an understanding as to why these cases were still open, we selected a sample of 85 cases—25 each from the first three populations and 10 from the fourth. For these 85 cases, 38 (45%) were still open as of November 2, 2007. Our review of these 38 open cases revealed that 28 (74%) of them were private properties to which field inspectors could not gain access because the lots were FLP cases and that 10 (26%) were non-FLP cases opened prior to January 1, 2004.

One potential reason for the backlog of cases, therefore, would appear to be LCD's handling of FLP cases. According to an Access Warrants Unit official, courts reject access-order requests if the NOV upon which the request is based was improperly prepared or distributed.

For example, if the ownership information on the NOV does not match the ownership information on the property deed, or if the owner's address is incorrect, the court generally rejects the request. In addition, if multiple owners are listed on the property deed, there must be evidence that the NOV was sent to each owner.

Our review of the 28 FLP cases revealed that for 18 (64%) cases, Intake did not ensure that correct information was provided to DOHMH so that it could properly prepare the NOVs and distribute them to the property owners. This prevented the Access Warrants Unit from submitting proper access-order requests to the City Law Department. Some examples of these errors are presented below:

- CCU #05-12284: Intake did not submit complete address information to DOHMH for one of the owners of the property.
- CCU #06-9001: The lot owner had two addresses, but Intake only identified one.
- CCU #06-8244: There were two owners, but Intake only identified one.
- CCU #06-06459: The owner's address was incomplete because the suite number was omitted.

When we brought this matter to the attention of LCD management, training sessions were arranged for Intake staff to improve the accuracy and completeness of the information provided to DOHMH for the preparation and distribution of NOV's.

The remaining 10 (26%) of the 38 cases in our sample that were still open as of November 2, 2007, were pre-2004 cases. On April 21, 2008, after months of delay, LCD officials finally provided requested documentation on these cases. This documentation indicated that 8 of the 10 lots were no longer vacant and that 2 had been cleaned. However, they could not explain why any of these non-FLP cases, which had been open an average of seven years, were still open as of November 2, 2007. LCD officials said that they had not considered closing out old cases in the PowerBuilder system to be the top priority. The top priority was to address new complaints, especially those that were made through the 311 system.

LCD management could have used PowerBuilder to generate reports on aging cases. The reports would have identified cases that were still open and the length of time they had remained open. LCD would then have been able to use this information to research those cases that had remained open for a considerable time. For example, district superintendents could have reviewed reports on all cases that had been open for more than six months. The reviews could have determined why the cases remained open and what needed to be done to resolve them. In a memo to the auditors dated March 10, 2008, the Assistant Chief of LCD stated that new procedures were being put in place to address some of these issues relating to a more effective use of PowerBuilder. The memo stated that managers, supervisors, district superintendents, and the Deputy Chief are now required to monitor reports in PowerBuilder at least twice a month for purposes of identifying and resolving unprocessed cases.

The Assistant Chief stated that LCD has started to identify and resolve aging cases in PowerBuilder, beginning with cases that originated in 2006 and 2007 and then continuing with the older cases that originated in 2005 and earlier. According to the Assistant Chief, LCD first determines whether a subsequent case has been opened on a lot for which there is an aging case in PowerBuilder. If a subsequent case has been opened, the old case is closed in PowerBuilder. LCD also determines whether the paper file on the case indicates that the case was closed even if it remains open in PowerBuilder. If the paper files indicate that the case had been closed, the case is closed in PowerBuilder. If the case is not closed through these reviews, then the lot is reinspected to determine whether the lot is still both dirty and eligible for cleaning. Based on the results of the reinspection, LCD either closes the case or begins the process of arranging to clean it.

Recommendations

DSNY should:

6. Continue to provide training to Intake staff to reduce the number of errors and omissions in the information provided by Intake to DOHMH for the preparation of NOV's.

DSNY Response: "The training of Intake staff is ongoing; when mistakes are made, Intake supervisors review the mistake with the errant employee."

7. Continue to expand use of PowerBuilder's tracking reports to identify aging cases.

DSNY Response: "The Department will immediately expand its use of this tool."

8. Continue to expand efforts to research aging cases to determine why they remain open and take the necessary actions to resolve them.

DSNY Response: "An enhanced process has been implemented to review and close out cases in a timely fashion. In addition, the expanded use of the PowerBuilder system will aid the Department in identifying aging cases."

DSNY Lacked Time Standards for Resolving Vacant Lot Complaints And Field-Generated Work Orders

Our review of LCD procedures for handling vacant lot complaints and field-generated work orders revealed that it does not have written time standards for resolving these complaints and work orders. Without standards, DSNY is unable to determine whether the Vacant Lot Clean-up Program is operating as efficiently as possible. Time standards are a useful management tool because they facilitate the measurement of operational efficiency. Time

standards would enable DSNY management to more effectively identify and address obstacles preventing LCD from completing work orders more quickly.

Of the 6,191 lots that were reportedly cleaned in Fiscal Year 2007, 1,141 lots were cleaned as a result of 311 complaints, and 5,050 were cleaned as a result of non-311 complaints (those that came in via letters or faxes) and field-generated work orders. Table IV, below, shows that the 6,191 lots were reportedly cleaned in an average of 43 days from the date of the initial inspection to the date that the cleaning was completed.

Table IV
Number of Days from Initial Inspection to Cleaning
For All Vacant Lots Reportedly Cleaned in Fiscal Year 2007

Category of Vacant Lots	Less than 31 Days	31-60 Days	61-90 Days	More than 90 Days	Total Number of Lots	Average Number of Days
311 Lots	644	395	50	52	1,141	35
Non-311 and Work-Order Lots	1,663	2,280	778	329	5,050	45
Totals (Weighted Average)	2,307	2,675	828	381	6,191	43

Table IV also shows that LCD took an average of 35 days to clean the 1,141 lots about which there were 311 complaints. LCD took an average of 45 days to clean the 5,050 lots about which there were non-311 complaints or field-generated work orders.

LCD officials told us that 311 complaints are a priority because of the City’s initiative to ensure that these complaints are addressed as quickly as possible. While only 56 percent of the 311 lots were cleaned within 30 days, this exceeds the 33 percent of the non-311 and work-order lots that were cleaned within 30 days. Overall, only 2,307 (37%) of the 6,191 lots were cleaned within 30 days of the initial inspection.

A major hindrance towards LCD’s goal of cleaning lots in a timely manner is the weak oversight of the use of resources; as noted previously, LCD appears to be assigning cleaning resources to “clean” lots that are already clean, as well as assigning more resources than necessary to clean dirty lots. In addition to improved oversight, setting time standards for complaints and field-generated work orders could help ensure that LCD responds to complaints and field-generated work orders in a more timely manner.

Recommendation

DSNY should:

9. Develop written time standards for handling vacant lot complaints and field-generated work orders.

DSNY Response: “We will take this recommendation under advisement. We have always tried to improve the turn-around time of cleaning of lots. Unfortunately, the “Fenced and Locked Private” (FLP) properties are affected by variables such as changes in ownership or court and legal determinations that can skew the overall turn-around time. If the FLP properties were removed from the equation, the average length of time for the department to clean a lot would decrease. We will look to improve our overall handling of paperwork and create a bi-weekly report on outstanding and eligible lots.”

Auditor Comment: We continue to believe that setting time standards would better enable DSNY management to monitor the timeliness of its handling of vacant lot complaints and work orders. A reasonable alternative would be for DSNY to develop time standards for the handling of vacant lot complaints and work orders relating to non-FLP properties.

APPENDIX



CCU#: 08-5314

Borough: The Bronx

Block: 2514

Lot(s): 70, 72, 73

Location: Between 1123 & 1139 Nelson Avenue

Lot Condition & Date as Listed on DS866: Weeds & Litter on 1/11/2008

Date of Auditors' Photo: 1/31/2008

Date(s) Lot Was Cleaned: 3/6/2008 – 3/7/2008

Amount of Refuse Removed From Lot, in Tons: 7.17



CCU#: 08-5316

Borough: The Bronx

Block: 2519

Lot(s): 27, 32

Location: Rear of 1314 Nelson Avenue

Lot Condition & Date as Listed on DS866: Litter/Weeds on 1/11/2008

Date of Auditors' Photo: 1/31/2008

Date(s) Lot Was Cleaned: 3/5/2008

Amount of Refuse Removed, in Tons: 2.07



CCU#: 08-5318

Borough: The Bronx

Block: 2830

Lot(s): 44, 48, 52, 57, 62, 72

Location: Rear of 1346 Sheridan Avenue

Lot Condition & Date as Listed on DS866: Weeds & Litter on 1/11/2008

Date of Auditors' Photo: 1/31/2008

Date(s) Lot Was Cleaned: 2/29/2008 – 3/3/2008 (2 Days)

Amount of Refuse Removed from Lot, in Tons: 11.41



CCU#: 08-5319

Borough: The Bronx

Block: 2516

Lot(s): 9

Location: Adjacent to 1192 Ogden Avenue

Lot Condition & Date as Listed on DS866: Weeds & Litter on 1/11/2008

Date of Auditors' Photo: 1/31/2008

Date(s) Lot Was Cleaned: 4/3/2008

Amount of Refuse Removed from Lot, in Tons: 16.38



sanitation

Page 1 of 5
JOHN J. DOHERTY
Commissioner
125 Worth Street, Room 720
New York, New York 10013

June 25, 2008

Mr. John Graham
Deputy Comptroller for Audits, Accountancy & Contracts
Office of the Comptroller
1 Centre Street, Room 530 South
New York, NY 10007

**Re: DRAFT: Audit Report on the Department of Sanitation
Vacant Lot Clean-Up Program
(ME08-064A)**

Dear Deputy Comptroller Graham:

Thank you for the opportunity to review and comment on the referenced draft report before its public release. At a time when every City agency is being asked to do more with less, we appreciate your office's efforts to help us improve our lot cleaning operation.

The following is the Department of Sanitation's (DSNY) response to the main audit findings and nine recommendations in the report:

CONTROLS OVER LOT CLEANING OPERATIONS

Audit Finding: According to the audit, "the DSNY Vacant Lot Clean-up Program had inadequate internal controls over the way it identified vacant lots for cleaning and managed the cleaning of the lots. As a result, LCD resources appear to have been used inefficiently. In addition, the inadequate internal controls increased the possibility that LCD resources could have been used for purposes contrary to their intended use." (Page 8, Paragraph 4)

DSNY Response: This statement from the draft report does not fully capture the control activities currently in place at DSNY, nor does it recognize certain unique circumstances affecting lot cleaning operations. In accordance with the City's health code, the program's primary mission is to service lots on a scheduled basis in order to prevent health hazards such as rodent infestation, the spread of the West Nile Virus, etc. However, we also service street conditions, sidewalk conditions, illegal dumping sites, uncut streets, etc. that crews encounter during their routes. Such conditions can inhibit individuals from accessing a public area or impede the ability of emergency vehicles to reach their destination. We give crews the discretion to clean these situations as necessary. Prior to this audit, the crews were not required to document and quantify these unscheduled cleanings. We will now make it a requirement to track the time spent on these cleanings and estimate the amount of debris removed.

www.nyc.gov/sanitation

KEEP NYC CLEAN



REDUCE, REUSE, RECYCLE



DON'T LITTER



printed on recycled paper

Audit Finding: "There is little evidence that anyone reviews Field Supervisor-generated work orders to determine whether the work is really necessary and whether the planned use of resources is appropriate for the scheduled work. These weak controls appear to result in work orders being generated unnecessarily and lots possibly being cleaned when they did not need to be cleaned." (Page 9 Paragraph #2)

DSNY Response: The Department would like to point out that Field Supervisors ensure that lots within their assigned districts are cleaned. Additionally, the Field Supervisor overseeing a particular work area (district) is most familiar with the lots, including trends and patterns of how often the lots need cleaning. Spot checks by the District Superintendent and the LIU supervisor will henceforth be documented and signed off. A lot is not identified for cleaning activity unless it either shows debris, weeds, etc. or if extensive field experience and recent trends indicate that cleaning will likely be necessary in the imminent future, particularly in the case of City-owned lot.

Audit Finding: "We reviewed the work orders for 37 lots and found two clear instances in which the size of the cleaned lot did not justify the amount of labor used.

- A work order (CCU #08-5345) for a vacant lot located on Stanhope Street in Brooklyn indicated that the dirty lot was 21' wide by 100' long (2,100 square feet). A crew of five to seven workers was assigned each day for seven workdays in March 2008 to clean this lot. Each crew member worked between 5 ½ and 6 ½ hours each day on what was described on the work order as "groundwork," which primarily involves the cutting of high grass and weeds.
- A work order (CCU #08-5349) for a vacant lot located on DeKalb Avenue in Brooklyn indicated that the dirty lot was approximately 27' wide by 68' long (approximately 1,836 square feet). A crew of seven workers was assigned to work between 5 ½ and 6 ½ hours each day for three days in March 2008 to do "groundwork" on this lot.

When we presented these two cases to LCD officials, they agreed that the assigning of workers to these lots appeared to be excessive.

Seen in the best light, the use of LCD resources to clean a lot that is already clean is a waste of City resources, as is the assigning of excessive resources to clean a lot. Of real concern, however, is that due to inadequate management controls, there is an increased possibility that resources were used for purposes contrary to their intended use." (Pages 11-12)

DSNY Response: The Department has carefully reviewed these cases and determined that these lots were dirty on the dates they were cleaned. In certain instances, given the immediate availability of property location information, occasionally it is necessary to utilize the numbers of adjacent lots to record work performed in surrounding areas and on the street/sidewalk fronting the properties. After a preliminary review of the photos provided by the auditors, LCD officials agreed that worker assignments seemed excessive. However, based upon a thorough investigation with respect to these sites, the LCD Unit determined the following:

- CCU #08-5345/Stanhope Street - Five Community Associates/Assistants with one S/W Collection Truck were assigned to clear this property as stated. This lot rolls uphill from the street and there is a fence 93 feet back. At the time of cleaning there was debris five feet high hidden from view. Hand crews peeled the fence back and performed clearing activities. The debris was bagged at the rear of the property and walked through the lot to the collection truck. The crew also worked along the block face into the street cleaning perimeters on both sides of Stanhope Street.
- CCU #08-5349/DeKalb Avenue - A crew of seven Community Assistants/Associates worked on this lot from Thursday, 3/13/08 through Monday, 3/17/08. There was debris at the back of the lot behind a car. This crew walked all material off the lot. Additionally, the crew cleaned the lot's perimeters -- debris along the block face going toward Myrtle Avenue, including the police lot, and the street on both sides of DeKalb Avenue. All of the labor and collected debris was associated with this work order.

Based on these relevant factors, we have determined that the appropriate resources were assigned to clean these properties.

RECOMMENDATIONS:

1. **Prepare and implement written procedures to ensure that field supervisors' functions are properly segregated and supervised.**

DSNY Response: The Department believes that it is not necessary to segregate the responsibilities of the field supervisors and believes that its current procedures already satisfy this recommendation. Field Supervisors are the most qualified to perform this activity and are held responsible to ensure that lots within their assigned districts are properly cleaned. Additionally, the Field Supervisor overseeing a particular work area (district) is most familiar with the lots, including trends and patterns of how often the lots need cleaning. We are not opposed to the LIU inspecting all lots, however, a substantial portion of inspections are complaint-generated, and do not necessarily lead to eligible work. District Superintendents will have overall say on field lot cleaning operations. As a result of this audit, the Deputy Chief of lot cleaning will explore the possibility of enhancing the standards, goals and monitoring of the field operations. The Department will continue to review LCD operations as well as worker supervision.

2. **Provide for independent verifications of Field Supervisor-generated work orders by requiring photographs of all inspected lots for review by District Superintendents or LIU.**

DSNY Response: As suggested, Field Supervisors are presently taking photos of their lot inspections for review by District Superintendents.

3. **Ensure that District Superintendents or LIU conduct sample inspections to verify the validity of field-generated work orders.**

DSNY Response: The District Superintendent and the Lot Inspection Unit Supervisor

will spot check a sample of field - generated work orders to ensure their validity. These spot checks will be documented.

4. **Ensure that District Superintendents review Field Supervisor's plans for assigning resources to clean specific lots.**

DSNY Response: The Department agrees with this recommendation. However, due to the overall workload and widespread areas of responsibility, District Superintendents can randomly monitor resource allocations by spot-inspecting locations prior to work. The Deputy Chief of Lot Cleaning will explore enhancing the standards, goals, and monitoring of the field operations. The Deputy Chief of Lot Cleaning will report to the Assistant Chief of Lot Cleaning on a weekly basis to resolve any findings.

5. **Require photographs be taken of cleaned lots for review by the district superintendent.**

DSNY Response: This operation is now in effect.

CONTROLS OVER LOT CLEANING CASE MANAGEMENT

With respect to the 1,800 cases cited as being "open" in LCD's Power Builder system for an average of more than three years, the Department has determined that over 90% of the lots were actually worked on or found to be ineligible within the average period of time but were not closed-out in the system. DSNY will enhance its utilization of its Power Builder Program.

RECOMMENDATIONS:

6. **Continue to provide training to Intake staff to reduce the number of errors and omissions in the information provided by Intake to DOHMH for the preparation of NOVs.**

DSNY Response: The training of Intake staff is ongoing; when mistakes are made, Intake supervisors review the mistake with the errant employee.

7. **Continue to expand use of PowerBuilder's tracking reports to identify aging cases.**

DSNY Response: The Department will immediately expand its use of this tool.

8. **Continue to expand efforts to research aging cases to determine why they remain open and take the necessary steps to resolve them.**

DSNY Response: An enhanced process has been implemented to review and close out cases in a timely fashion. In addition, the expanded use of the PowerBuilder system will aid the Department in identifying aging cases.

LACK OF TIME STANDARDS FOR RESOLVE VACANT LOT COMPLAINTS

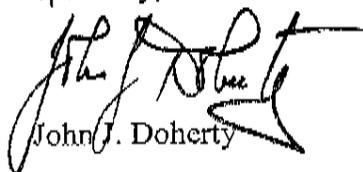
9. Develop written time standards for handling vacant lot complaints and field-generated work orders.

DSNY Response: We will take this recommendation under advisement. We have always tried to improve the turn-around time of cleaning of lots. Unfortunately, the "Fenced and Locked Private" (FLP) properties are affected by variables such as changes in ownership or court and legal determinations that can skew the overall turn-around time. If the FLP properties were removed from the equation, the average length of time for the department to clean a lot would decrease. We will look to improve our overall handling of paperwork and create a bi-weekly report on outstanding and eligible lots.

The Department of Sanitation's Lot Cleaning Division has a mandate to keep vacant lots and surrounding areas free of trash, weeds and conditions that threaten health and safety. We work to carry out these functions efficiently and with customer service responsiveness strongly considered.

Please contact our audit liaison, Mr. Cris Gonzales at 917-237-5326, should you or your staff require further information.

Sincerely,



John J. Doherty

- c: Jeffrey Kay, Director, Mayor's Office of Operations
 Paul Cataldo, Director, OMB-Office of Community Development
 Michael A. Bimonte, DSNY First Deputy Commissioner
 Lorenzo Cipollina, DSNY, Deputy Commissioner of Administration and Finance
 Bernard Sullivan, Director, DSNY, Bureau of Cleaning and Collection
 Cris Gonzales, DSNY, Director of Internal Audits