

AUDIT REPORT



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

Audit Report on the Enhanced Pest Control Program Of the Department of Health

ME02-059A

June 27, 2003



THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
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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 Comptroller's responsibilities contained in Chapter 5, §93, of the New York City Charter, my office has audited the Department of Health (DOH) to determine whether its implementation of the Enhanced Pest Control Program improved the effectiveness of the agency's overall pest control efforts. DOH, now part of the Department of Health and Mental Hygiene, enforces compliance with the City Health Code and provides programs and services to promote the health of City residents.

Our audit resulted in the findings and recommendations that are presented in this report. The findings and recommendations were discussed with City officials; their comments were considered in the preparation of this report.

Audits such as this provide a means of ensuring that City resources are used effectively, efficiently, and in the best interest of the public.

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/GR

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

**Audit Report on the
Enhanced Pest Control Program
Of the Department of Health**

ME02-059A

AUDIT REPORT IN BRIEF

This audit determined whether the Department of Health's (DOH) implementation of the Enhanced Pest Control Program improved the effectiveness of the agency's overall pest control efforts. DOH, now part of the Department of Health and Mental Hygiene (DOHMH), enforces compliance with the City Health Code and provides a range of public health programs and services to promote the health and quality of life of City residents. (This audit covered a period prior to the organizational change.) The Office of Pest Control Services (PCS) enforces the Health Code regulations pertaining to rodent infestation. The scope of our audit was Fiscal Year 2001.

Audit Findings and Conclusions

In some areas, PCS has improved the effectiveness of its pest control efforts through the Enhanced Program. PCS is doing a better job at targeting problem areas under the Enhanced Program than it did under the program's predecessor, the Comprehensive Program. However, we found weaknesses in PCS's administration of the Enhanced Program and with its follow-up and remediation efforts for properties where pest control violations were identified. PCS regional offices do not consistently comply with the informal procedures of the program, inhibiting the agency's ability to monitor the program's overall effectiveness and identify areas for improvement. In addition, PCS consistently fell short of meeting the timeliness goals for performing pest control activities. These weaknesses, if not corrected, will significantly hinder the overall effectiveness of DOHMH in its pest control efforts.

At the exit conference in April 2003, DOHMH officials stated that there were two extraordinary situations that took place during our review period—the West Nile virus crisis in spring 2001 and the attack on the World Trade Center in September 2001—that necessitated the deployment of PCS staff to support DOH efforts to combat the virus and clean up after the attack. This put a strain on PCS resources and affected the timeliness of its pest control efforts. Officials stated that we would find a significant improvement since the audit scope period if we reviewed more recent pest control operations, such as those during Fiscal Year 2002.

However, when we met with DOHMH officials in January 2003 to discuss the audit's findings, DOHMH officials did not identify the deployment of PCS staff to combat the West Nile virus or to assist in the World Trade Center cleanup as factors in the delays we noted. Moreover, officials at the exit conference told us that the PCS database was not fully functional until February 2003 and that it had no formal procedures for the Enhanced Program. Therefore, although it is possible that the timeliness in performing pest control activities may have improved in some areas, the weaknesses we identified in regard to oversight would have existed even had we reviewed the PCS operations for a later period.

Audit Recommendations

We made four recommendations in this report. DOHMH should:

- Ensure that PCS offices comply with the procedures stated in the Geographic Protocol to better enable the agency to monitor the Enhanced Program and track its overall effectiveness.
- Ensure that senior sanitarians cluster properties related to specific assessments in the PCS database so that staff can use the database to check the status of assessments.
- Take steps to ensure that the PCS regional offices perform all required pest control work in a timely manner and properly maintain records of the work that is performed in accordance with written procedures.
- Ensure that supervisors thoroughly review inspection reports and verify that inspectors recommend remediation efforts (e.g., extermination and cleanup) for properties that fail inspection and meet the criteria for remediation.

Agency Response

In its response, DOHMH generally agreed with the audit's recommendations. However, the agency disagreed with some of the audit's findings, specifically those related to DOH's compliance with the program's informal procedures and its timeliness in performing pest control activities.

INTRODUCTION

Background

The Department of Health (DOH), now part of the Department of Health and Mental Hygiene (DOHMH), promotes and protects the health and quality of life of City residents by enforcing compliance with the City Health Code and providing a broad range of public health programs and services to monitor, prevent, and control disease. This audit covered a period prior to the organizational change.¹

The Office of Pest Control Services (PCS) enforces the Health Code regulations pertaining to rodent infestation and to conditions conducive to such infestation. The mission of PCS is to “protect the public from rodent-borne disease and improve quality of life through reduction of rodent population.” Its seven regional offices throughout the five boroughs conduct inspections, exterminations, and property cleanups as needed.

In August 1997, DOH implemented the Comprehensive Rodent Control Program (Comprehensive Program) as a new approach in combating rodent problems in the City. Rather than relying solely on complaints to identify areas needing remediation, this program targeted for inspection, extermination, and cleanup efforts 70 areas throughout the City that historically had severe rodent problems. In October 1999, the Comprehensive Program was replaced by the Enhanced Pest Control Program (Enhanced Program). With this new program, DOH intended to use more current information to identify clusters of rodent infestations. Once the clusters are identified, resources are directed to the geographic areas to fight the infestation. Under both the Comprehensive and Enhanced programs, DOH continued to also provide inspection and remediation services in response to specific complaints.

The emphasis of the Enhanced Program is, according to a DOH official, to identify “strategic geographic areas with rodent problems” and take remediation efforts. This effort is accomplished through the use of geographic assessments. A geographic assessment is a “survey of an area that has been identified to have a rodent problem. An area constitutes a one block or multi-block area,” and the group of properties that make up an assessment area are known as a “cluster.” An assessment may be initiated internally or in response to requests or complaints received from various sources, including individuals, community boards, or elected officials.

PCS has six regional offices, in Queens, North Brooklyn, South Brooklyn, Manhattan, the Bronx, and Staten Island. (Prior to January 2002, PCS had two Manhattan offices: a Lower East Side office and an East Harlem office. PCS closed the Lower East Side office in January 2002.) Regional directors are responsible for coordinating the geographic assessments. A description of the area where the rodent problem was identified, the nature of the problem, and the properties that are part of the area are recorded by a director on a geographic assessment sheet. The

¹ The Department of Health and Mental Hygiene (DOHMH), formed in July 2002, is a merger of the former Department of Health and Department of Mental Health, Mental Retardation and Alcoholism Services.

assessment sheet is forwarded to that regional office's senior sanitarian (the supervisor of the regional office's inspectors), who is responsible for scheduling inspections.

In Fiscal Year 2001, PCS established a database to record all of its pest control activities. The database is also used to generate various documents related to PCS pest control activities. When a senior sanitarian receives an assessment sheet, he enters the addresses of the properties in the database and generates a job ticket and an Initial Inspection form for each of the properties identified in the assessment. A job ticket contains information such as a job number, property address, and job source (i.e., personal complaint or geographic assessment). The job number is used for all subsequent pest control work performed at the property. The Initial Inspection form is used to record the results of an inspection and identify further actions, if needed. (Although the database was implemented in Fiscal Year 2001, DOHMH officials said that it was not fully operational until Fiscal Year 2003.)

The PCS database has a feature that allows PCS to cluster the properties related to a specific assessment. If a property is part of an assessment area, the sanitarian should cluster this property with the other properties that are part of the same assessment area. The system assigns a Chart ID number for each clustered assessment; all properties in an assessment have the same number. This Chart ID feature enables PCS to use the database to review the status of an assessment. According to PCS officials at the exit conference, the cluster feature was not fully implemented until February 2003.

Each day, the senior sanitarian provides each inspector with the job ticket and corresponding Initial Inspection form for each property the inspector is assigned to visit. The inspectors complete daily activity reports that list the properties visited and the results of the inspections; the results of the inspections are entered in the PCS database.

PCS pest control efforts consist of up to five stages: (1) initial inspection, (2) 5-Day letter, (3) compliance inspection, (4) extermination, and (5) cleanup. If an inspector finds no violation at a property, PCS takes no further action and the case is closed. If a violation is noted during an initial inspection, PCS forwards the inspection report to the DOH Research and Billing Department (Research), which sends a "5-Day letter" to the property owner stating that the owner has five days to correct the problem. PCS has a timeliness goal to perform a compliance inspection 10 days after the owner receives the 5-Day letter. If the violation has not been corrected at that time, PCS issues a notice of violation to the owner, performs extermination and cleanup services as needed, and bills the owner. According to PCS timeliness goals, the extermination should be performed within 10 business days and cleanup within 20 business days of the compliance inspection. (See Appendix A for a table showing the steps and timelines for PCS inspection and remediation efforts.)

In Fiscal Year 2002, PCS inspected 42,132 properties as part of the Enhanced Program and inspected 18,873 properties in response to specific complaints. DOH's pest control budget for Fiscal Years 2001 and 2002 was \$13.5 million and \$14 million, respectively.

Audit Objective

The objective of this audit was to determine whether the implementation of the Enhanced Pest Control Program by DOH has improved the effectiveness of its overall pest control efforts.

Scope and Methodology

The scope of our audit was Fiscal Year 2001. To gain an understanding of PCS operating policies and procedures, we interviewed relevant personnel from the DOH commissioner's office, from the PCS main office in Astoria, and from the seven PCS regional offices: Queens, North Brooklyn, South Brooklyn, Bronx, East Harlem, Lower East Side, and Staten Island. In addition, we reviewed relevant documentation, such as the *DOH Policy and Procedure Manual*, in draft, which includes the Geographic Protocol (the procedures for the Enhanced Program).

To determine whether under the Enhanced Program PCS improved its effectiveness in identifying problem areas, we reviewed performance data regarding the properties with violations identified by the Enhanced Program in Fiscal Year 2001 and compared it with like data from the Comprehensive Program.

To assess the reasonableness of the reported figures for the Enhanced Program, we randomly selected a sample of 86 properties that were targeted as part of the Enhanced Program during the period April 2001 through June 2001 and analyzed the performance of PCS in identifying properties with violations.

To determine whether staff productivity improved under the Enhanced Program, we attempted to compare staffing and productivity figures for the Enhanced Program with those for the Comprehensive Program. We requested a listing of PCS staff for Fiscal Years 1997 through 2002. However, PCS only provided a listing covering Fiscal Year 2002. Moreover, we were unable to obtain a reliable count of the number of persons employed in PCS during that year because the personnel data we received from DOH did not reconcile with the data we obtained from the City Payroll Management System (PMS); and DOH was unable to account adequately for the discrepancies.

DOHMH Response: “We are concerned that the auditors were unable to perform an assessment of productivity changes from FY 1997 through 2002. . . . Had requests for this information been given to senior agency management, we would have been able to provide data that would have enabled the auditors to comment on this matter. We believe that at least some of the problems here were due to the auditors’ request that we distinguish complaint staffing from geographical staffing, a distinction that has no relationship to our actual deployment of staff, who often do both kinds of work in a single day.”

Auditor Comment: We forwarded our requests to the Deputy Director of Field Operations, the DOH-appointed liaison to the audit team. When he failed to respond to our requests, we directed our requests to the PCS Director himself. If these persons were unable to provide the requested information, they should have directed us to persons who

could provide it. Moreover, we did not request that DOH distinguish complaint staffing from geographical staffing; we requested a listing of all PCS staff. We are aware that PCS staff perform pest control duties for both personal complaints and geographic assessments. That is the reason we evaluated PCS's timeliness in performing duties for both types of work in this audit.

To assess whether PCS is responding to complaints within the required time frame, we conducted tests on a random sample of 182 personal complaints that were received by the DOH Central Complaints Unit. These complaints were selected from a list of 3,948 complaints received by Central Complaints during the period April 2001 through June 2001. We reviewed supporting documentation obtained from the regional offices and the PCS pest control database. We randomly selected a subsample of 24 complaints to determine whether PCS and Research properly performed remediation efforts when needed (i.e., sent 5-Day letters to property owners, performed compliance inspections, and provided exterminations and cleanup services as required).

To ascertain whether PCS complied with the procedures of the Geographic Protocol (protocol), we reviewed a random sample of 130 geographic assessment sheets prepared by five of the seven regional offices (the other two offices—North Brooklyn and Queens—did not prepare assessment sheets). These sheets list properties that had been identified as being in geographic areas targeted in the Enhanced Pest Control Program. We reviewed the sheets to assess whether they contained all required information, including the signature of the Regional or Borough Manager. We also determined whether the offices updated the assessment sheets as required.

To assess whether PCS was in compliance with the time requirements for performing pest control activities, we conducted tests on the sample of 86 properties that were selected as part of the Enhanced Program. (We were unable to determine the full population of properties that were part of the program because the offices did not maintain a total listing of these properties.) We selected part of our sample from assessment sheets prepared by five of the seven regional offices during the period April through June 2001. For one of the remaining offices (North Brooklyn), we selected items from a PCS inspector's daily activity report dated June 11, 2001. For the other office (Queens) we selected properties by using an Inspection Report that listed inspections performed under the geographic program during the period April 2001 to December 2001.

We reviewed information recorded on the PCS database and any related documents obtained from the regional offices in an attempt to determine the timeliness and outcome of the initial inspections that were conducted for the 86 properties. For properties where violations were identified, we determined whether DOH sent 5-Day letters to property owners, performed compliance inspections, and provided exterminations and cleanup services when required and in a timely manner. We notified DOH of those steps for which evidence of performance was lacking and requested any documentation to indicate that the steps were in fact performed. Although this request was made numerous times during the course of the audit, DOH provided no documentation to us until the exit conference, after the fieldwork had ended. Because of the lateness of the submission, we were unable to determine the validity of the documents presented.

Nevertheless, these documents were taken into consideration and changes to the report were made where warranted.

DOHMH Response: “We are concerned about the comments in the draft audit that suggest that we were not forthcoming with information and did not take full opportunity to present our position at meetings before the exit conference. The audit document does not acknowledge that there was complete turnover of the audit team, and that information provided to the first set of auditors may not have been effectively communicated to the new auditors who worked conscientiously to finish the audit. In addition, while a meeting did take place in January, the overall findings were presented orally and with little detail. In fact, the preliminary draft and the exit conference were our first opportunity to review the auditors’ data and conclusions.”

Auditor Comment: DOHMH’s comment that there was complete turnover of the audit team is incorrect. While it is true that there was some staff turnover, the lead auditor of the assignment remained in place from the start of the audit to the completion of fieldwork. Regarding the audit’s findings, as we state above, we made numerous requests during the audit fieldwork for DOH to provide documentation to indicate that steps were performed for which evidence was lacking. For example, on March 21, 2002, we made a request to the North Brooklyn office to provide evidence of exterminations performed for some properties in our sample from that office. On January 10, 2003, we made a request to the North Brooklyn Regional Director for the same information. However, no evidence was provided until April 2003 at the exit conference, after the audit fieldwork was completed and when time for the review of the evidence was limited.

This audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) and included tests of the records and other auditing procedures considered necessary. This audit was performed in accordance with the New York City Comptroller’s audit responsibilities as set forth in Chapter 5, §93, of the New York City Charter.

Discussion of Audit Results

The matters covered in this report were discussed with DOH officials during and at the conclusion of this audit. A preliminary draft was sent to DOHMH officials and was discussed at an exit conference on April 25, 2003. On May 23, 2003, we submitted a draft report to DOHMH officials with a request for comments. We received a written response from DOHMH on June 13, 2003. In its response, DOHMH generally agreed with the audit’s recommendations. However, the agency disagreed with some of the audit’s findings, specifically those related to DOH’s compliance with the program’s informal procedures and its timeliness in performing pest control activities. DOHMH’s response stated:

“DOHMH shares with the Comptroller’s Office the goal of maximizing the efficiency and efficacy of the Pest Control Services Program. The Program’s staff continues to work with diligence and dedication to improve the quality of life and health for all residents of New York City. Over the past three years numerous program changes and systems have been introduced to improve program services.

These improvements have resulted in record-breaking increases in performance indicators over the past two years. Although the Department may disagree with some of the findings of the Comptroller's Office, we welcome its recommendations as a catalyst and spur to ongoing program improvement.”

The full text of the DOHMH comments is included as an addendum to this report.

FINDINGS AND RECOMMENDATIONS

In some areas, PCS has improved the effectiveness of its pest control efforts through the Enhanced Program. PCS is doing a better job at targeting problem areas under its Enhanced Program than it did under its Comprehensive Program. However, we found certain weaknesses with PCS's administration of the Enhanced Program, as well as with its follow-up and remediation practices for properties where pest control violations were identified. Specifically:

- PCS regional offices do not consistently comply with the informal procedures of the Enhanced Program. We found inconsistencies in the manner in which each of the offices administers the Enhanced Program, which hinders the agency's ability to monitor the program's overall effectiveness and to identify areas for improvement.
- PCS consistently fell short of meeting the timeliness goals for performing pest control activities. For example, 158 (87%) of the 182 sampled properties relating to personal complaints were either inspected late or not at all. Consequently, we found that properties found to be in violation of the City Health Code were not reinspected, exterminated, or cleaned in a timely manner, allowing conditions to remain and possibly deteriorate.

These weaknesses, if not corrected, will significantly hinder the agency's overall effectiveness in its pest control efforts.

Enhanced Pest Control Program Targets Problem Areas More Effectively

PCS is doing a better job at targeting potential problem areas under the Enhanced Program than it did under the Comprehensive Program. According to a productivity report that was generated by the DOH Management Information System and Analysis, only 38 percent of the properties targeted and inspected under the Comprehensive Program (covering the period August 1997 through October 1999) needed remediation efforts. In comparison, for properties inspected under the Enhanced Program in Fiscal Year 2001, the percentage of targeted sites needing remediation rose to 77 percent.

To assess the reasonableness of the reported figures for the Enhanced Program, we selected from the seven PCS regional offices a sample of 86 properties that were targeted as part of the Enhanced Program during the period April 2001 through June 2001. Of these properties, however, PCS had no documentation that 14 were inspected (this issue is discussed in more detail beginning on page 16 of this report.) Our review of the remaining 72 inspected properties disclosed that 56 (78%) had violations due to evidence of rodent infestation, approximately the same rate that DOH reports for the entire program.

Overall, it appears that the geographic approach under the Enhanced Program is more effective at targeting those areas with severe rodent problems than the approach used under the Comprehensive Program. However, once the problem areas are identified, we found insufficient evidence to indicate that PCS follows up in a timely manner to remediate the conditions.

Furthermore, PCS regional offices do not consistently follow the procedures outlined in the protocol. This is discussed in more detail in the following section.

DOHMH Response: In its response, DOHMH emphasizes the increase in staff productivity under the Enhanced Program. DOHMH provides data showing the increase in the number of inspections (not including those related to personal complaints) since the Enhanced Program was initiated: from 27,618 in Fiscal Year 1998 under the Comprehensive Program to 42,132 in Fiscal Year 2002 under the Enhanced Program. DOHMH stated:

“When taken together with the much higher failed initial inspection rate in the Geographic Program (72%) as opposed to the Comprehensive Program (38%), these numbers reflect both improved productivity in terms of absolute numbers and much better targeting of properties and communities for inspectional attention.”

Auditor Comment: We acknowledge that the number of reported inspections has increased under the Enhanced Program, but other portions of the DOHMH response appear to make a case that the Enhanced Program’s higher failed initial inspection rate is due more to the categorizing of inspections by type under the Enhanced Program than to improved targeting of problem areas.

In another section of its response DOHMH appears to claim that no more than 10 percent of the geographic inspections are based on targeting problem areas through “formal” assessments; the remaining 90 percent are based on conditions observed by DOHMH personnel, such as inspectors and exterminators, during the course of their regular duties. These inspections do not necessarily target a number of properties in a geographic area but may cover a number of isolated properties in various areas. (This issue is discussed in more detail in the “DOHMH Response” and “Auditor Comment” sections beginning on page 13 of this report.)

If inspections of this type make up the overwhelming majority of geographic inspections, as DOHMH asserts in its response, it would help explain the significant increase in the failed inspection rate between the Comprehensive Program and the Enhanced Program. Moreover, by including these inspections under the umbrella of the Enhanced Program, DOHMH gives a misleading impression of its effectiveness in targeting problems areas, which hinders any assessment of the effectiveness of its targeting efforts.

Weaknesses in Administration of Enhanced Program

As previously stated, PCS is doing a better job under its Enhanced Program of targeting areas with rodent infestation. However, we noted certain weaknesses with its administration of the program. PCS regional offices do not consistently follow the procedures outlined in the protocol. In addition, PCS does not ensure that all remediation efforts are completed and performed in a timely manner.

Regional Offices Do Not Prepare Assessment Sheets and Update Assessments in Compliance with the Protocol

PCS regional offices do not consistently comply with the protocol of the Enhanced Program. Five of the offices either did not prepare assessment sheets or did not prepare them prior to inspecting properties and none of the offices updated the assessments as required. As a result, PCS is hindered in determining the program's overall effectiveness.

The protocol in the DOH *Policy and Procedure Manual* outlines the steps that PCS should follow to implement the geographic approach of the Enhanced Program. The protocol discusses the objective of the program and the process that PCS should follow in performing a geographic assessment.

The protocol calls for a survey to be performed for a targeted area and the results to be reported on a geographic assessment sheet. The assessment sheet is the starting point for the pest control activities and should therefore be prepared before the properties are inspected. The protocol also calls for PCS to follow up on the geographic assessments until they are completed, and for these updates to also be recorded on a geographic assessment sheet. According to the protocol:

“Updates should focus on required actions, status, and comment sections of the Geographic Assessment Sheet. Each Geographic Assessment must be updated every two to four weeks until completion.”

To ascertain whether PCS is complying with the requirements of the protocol, we requested the assessment sheets prepared by the seven regional offices during the period April 2001 through June 2001. Our review found that PCS does not consistently follow this protocol. Specifically, five of the offices did not prepare the sheets as required by the protocol: two offices did not prepare sheets at all, and three offices did not complete the sheets before conducting the inspections, as required by the protocol. These three offices completed the sheets only after performing the inspections. In addition, none of the seven offices regularly updated assessments as required, and only two updated assessments at all.

Regarding the assessment sheets, the Queens and North Brooklyn offices had none for the period we reviewed. The Queens office prepared a list for us that reportedly contained all properties inspected under the Enhanced Program during the period April 2001 through December 2001. However, the office did not cluster properties related to the same assessment, and could not identify which properties on the list related to their respective assessments. Based on our conversation with the Queens regional director, it appears that the Queens office does not have a systematic method for documenting and tracking the assessments. According to the Brooklyn Borough Manager (who oversees the North and South Brooklyn offices), the North Brooklyn office did not prepare assessment sheets because he believed that the forms were no longer required once the PCS database was implemented in Fiscal Year 2001. He believed that the database automatically groups properties related to the same assessments. However, his statement that there was no longer the need to prepare assessment sheets is in disagreement with

the protocol, which states that the sheets should be prepared. In addition, it is inconsistent with the practice of the South Brooklyn office, which *did* prepare assessment sheets. Moreover, the North Brooklyn office failed to cluster the properties on the database. (As stated previously, this step must be performed to signal the database to group those properties.) Since the office did not do this, the database could not be used later to capture the properties inspected under a specific assessment. (In fact, none of the offices used the database to cluster the properties in their assessments. According to DOHMH officials at the exit conference, the cluster functionality was not even available until February 2003.) Overall, neither the Queens nor the North Brooklyn office was able to determine how many geographic assessments their offices completed.

To determine whether PCS updated the geographic assessments as required by the protocol, we reviewed all of the assessment sheets prepared by the remaining five regional offices during the period April 2001 through June 2001. Overall, of the 130 assessment sheets prepared, only two (one each for the Lower East Side and Staten Island offices) were updates. Since the protocol requires that assessments be updated every two to four weeks, it would be expected that all of the assessments initiated in April and May 2001 would have been updated at least once during our review period. However, of the 78 assessments initiated during those two months, only one from the Lower East Side had been updated as of June 2001 (the other update was for an assessment initiated prior to April 2001). Furthermore, this update was conducted only five days after the assessment was initiated, although the protocol states that the updates should be conducted in two- to four-week intervals.

Even though the regional offices were able to determine the status of a particular property, they were unable to determine whether all work related to a specific assessment was completed because the regional offices did not update the assessments. (As previously stated, none of the regional offices used the database to cluster the properties in the geographic assessments. Therefore, they could not use the database to check the status of the assessments.) Assessment updates are intended to keep PCS officials abreast of work on the assessments and to help ensure that the work is completed and is performed in a timely manner. Timely updating of assessments would also better enable DOHMH management to review the program's overall performance and identify areas needing refinement or improvement.

At the exit conference, DOHMH officials disagreed with the findings of this section. Officials stated that since the Policy and Procedure Manual was in draft form, regional offices were not required to follow the guidelines stated in it. The manual was a "pilot" project; it was merely a collection of recommended practices, taking various practices from the different offices and incorporating them into one manual in an attempt to make the procedures followed by all of the offices more uniform. Regarding the assessment sheets, DOHMH officials stated that they were sent to regional offices, but the offices were not mandated to use them. Officials stated that over the course of time the procedures in the draft have been evaluated and refined as needed, based on the responses from the offices. One of the procedures abandoned was the preparation of assessment sheets, which the offices found to be too time consuming and cumbersome. The clustering feature of the PCS database that was fully implemented in February 2003 can now be used in lieu of the assessment sheets to track assessments.

From the statements made by DOHMH officials at the exit conference, it appears as if they are contending that the procedures stated in the draft manual were optional and that the offices had no obligation to follow them if they chose not to. However, this contention was not made to us during the course of the audit. DOH officials never stated that offices were not required to comply with the procedures contained in the protocol and acknowledged that they intended the procedures in the manual to be followed. Even though officials at the exit conference stated that the manual was a “pilot,” they stated that they did not set any parameters (e.g., designating certain offices to participate in the pilot) to evaluate its usefulness. Without knowing which offices consistently followed which procedures, it would be difficult for DOH to ascertain which procedures were effective and which needed to be refined or eliminated.

Regarding the preparation of the assessment sheets, DOHMH officials acknowledged that none of the offices were given explicit instructions to not prepare them. Furthermore, officials were unable to identify a systematic method in place to track assessments in lieu of the assessment sheets prior to the implementation of the cluster feature in the PCS database, which officials stated was not until February 2003. Officials stated that they rely on more informal methods, such as the number of complaints that they receive in the assessment area, to determine the success of an assessment. However, officials stated that they do not conduct a formal analysis to evaluate the success (e.g., the number of complaints received during specific time span prior to and after the assessment.)

DOHMH Response: In its response, DOHMH states that the criterion we use does not apply to the majority of the geographic inspections performed:

“The auditors were attempting to assess the geographic targeting of the Office of Pest Control Services. In doing so, they paid particular attention to a draft protocol on geographic assessment. In fact, the assessment procedures, . . . were only a very small part of the Geographic program, representing no more than five to ten percent of all geographic inspections. . . .

“Geographic inspections are typically scheduled when problematic properties or areas are observed by Pest Control Public Health Sanitarians and Exterminators, or by administrative personnel including Borough Managers and Regional Directors. Most often, the investigation of a complaint about a single property leads to the determination that another property in the area may have rodent problems as well, or has conditions conducive to rodent harborage. Geographic inspections are also based on reports from citizens, community boards, neighborhood organization and elected officials, who report ‘we have a rodent problem,’ for example ‘on Fulton Street,’ or ‘in Bushwick.’ From these very general complaints, a plan is developed by the Regional Office staff to inspect most if not all properties within a defined area (The formal geographic assessments discussed in the audit were applied to this type of situation.) If violations are found, Commissioner 5-Day Letters are issued, compliance inspections occur, and exterminations and cleanups are scheduled if warranted. Re-inspections of the properties previously found to be in violation may then occur in succeeding months.

“As noted above, there were 28,095 geographic inspections in FY 2001, which includes the period covered by the audit. As already stated, we estimate that no more than five to ten percent were due to the kinds of assessment and follow-up procedures discussed in the audit.”

Auditor Comment: We fail to understand DOHMH’s contention that the assessment procedures are applicable to only five to 10 percent of all geographic inspections. From its response, it appears that DOHMH now states that geographic inspections “are typically scheduled when problematic properties or areas are observed,” and that these are not part of geographic assessments. However, this is contrary to what we were told during the course of the audit and what is stated in DOHMH’s own informal procedures.

The stated emphasis of the Enhanced Program is to identify and target geographic areas throughout the City with rodent problems through the use of geographic assessments. However, DOHMH now claims in its response that at least 90 percent of the inspections performed under the Enhanced Program are not based on surveys of targeted areas throughout the City but instead are based on conditions observed by DOHMH staff during the course of their regular duties. Unlike inspections for a geographic assessment that target a number of properties in a geographic area, the inspections performed based on these DOHMH observations may target only isolated properties within various areas. (In fact, according to a DOHMH official at the exit conference, all inspections not originating through the Central Complaints Unit are categorized as a “geographic inspection” and included under the Enhanced Program.) For example, if an inspector finds a violation at a particular address in response to a personal complaint and, based on his findings, inspects an adjoining building not identified in the complaint, that additional inspection is categorized as a geographic inspection. In such instances, it is highly likely that violations will be found.

As we state previously, if at least 90 percent of the inspections performed under the Enhanced Program are of this type, including them in the figures for the Enhanced Program not only gives a distorted picture of the success of DOHMH’s targeting efforts, but goes against the stated intent of the Enhanced Program, which is to use a “multi-block approach” and have “greater focus on those *blocks* and *areas* of greatest need for pest control services.” (Emphasis added.)

DOHMH Response: Regarding the tracking of assessments and using assessment sheets, DOHMH stated:

“We do not disagree with the auditors’ findings that the use of the protocol included in the draft manual was limited—some offices not performing formal assessments, others not updating the data. We simply point out that this was a draft protocol that proved unworkable. PCS did not abandon the notion of Geographic assessments, but rather focused on finding a more efficacious means of performing and tracking those assessments. The result was the development of the PCS cluster report function within the program database to monitor and track all geographic assessments.”

Auditor Comment: DOHMH asserts that the assessment tracking method outlined in the protocol was unworkable; however, the fact remains that DOH (and later, DOHMH) did not establish an alternative method to track assessments until the PCS cluster report function in the PCS database was put into operation in February 2003—more than three years after the Enhanced Program was implemented in October 1999. Nevertheless, we are pleased that DOHMH is now able to use the cluster report function to track assessments. Based on DOHMH’s assertion that only 10 percent of the inspections performed under the Enhanced Program are related to assessments, this tool could be especially helpful in monitoring the success of geographic assessments in identifying problem areas throughout the City and DOHMH’s success in effectively remediating the conditions found.

Recommendations

DOHMH should:

1. Ensure that PCS offices comply with the procedures stated in the Geographic Protocol to better enable the agency to monitor the Enhanced Program and track its overall effectiveness.

DOHMH Response: “The improved database helps us to assure that the geographic program is being effectively managed, including both inspections arising out of the clustering feature and other inspections identified through fieldwork.”

2. Ensure that senior sanitarians cluster properties related to specific assessments in the PCS database so that staff can use the database to check the status of assessments.

DOHMH Response: “Senior Sanitarians as well as Regional Directors and Borough Managers are now using the new clustering feature of the database to track all geographic assessments.”

**PCS Does Not Meet Response Time Requirements
For Its Pest Control Activities**

PCS does not meet the time requirements stated in the DOH manual for its pest control efforts. Our audit testing found significant delays at all stages of the process, from the initial inspections to cleanup. Failure to perform pest control efforts in a timely manner allows rodent infestation to worsen, making remediation more difficult.

Regardless of how a property becomes targeted—whether from a personal complaint or as part of a geographic assessment—PCS’s inspection and remediation efforts are the same. Therefore, we selected a sample of properties from both personal complaints and geographic assessments to evaluate PCS’s timeliness in performing pest control tasks. Our review of PCS inspection and remediation efforts identified numerous delays at each stage of the process. Our findings are presented in the following sections.

Regional Offices Generally Do Not Follow the Time Guidelines for Conducting Initial Inspections for Geographic Assessments

For the geographic assessments, only one of the seven regional offices met the timeliness goal for conducting the initial inspection for the geographic assessments. In fact, only two of the offices completed the assessment sheets prior to conducting the initial inspections as required. In addition, offices failed to perform an initial inspection for 14 (16%) of the 86 sampled properties.

Regarding inspections performed under the Enhanced Program, the protocol states that initial inspections for geographic assessments should be scheduled “within two weeks [10 business days] of receiving the Geographic Assessment Sheet.” Inspectors record the results of their inspections on a Rodent Inspection Report (PC48).² DOH procedures call for the results recorded on the report to be entered in the PCS database.

We were unable to determine the timeliness of five of the seven offices in performing the initial inspection for geographic assessments because they did not prepare the sheets as required by the protocol. As stated previously, two of the offices did not prepare sheets at all, and three offices did not complete the sheets before conducting the inspections. For the two offices that did complete the sheets beforehand, only one (Lower East Side) performed the inspections within 10 days of the assessments being completed, as required by the DOH manual. The other office (East Harlem) performed the inspections an average of 80 days after the assessments were completed.

Notwithstanding time requirements, we selected a random sample of 86 properties to determine whether the initial inspection was performed as required. We selected part of our sample from assessment sheets prepared by five of the seven regional offices during the period April through June 2001. For one of the remaining offices (North Brooklyn), we selected items from a PCS inspector’s daily activity report dated June 11, 2001. For the other office (Queens) we selected properties by using an inspection report that listed inspections performed under the geographic program during the period April 2001 to December 2001.

DOHMH Response: Regarding our selection of properties from inspection and activity reports for inclusion in our sample, DOHMH stated:

“Inspections performed as part of a geographical assessment may be on a different time schedule in terms of follow-up from geographical inspections that are not part of an assessment. In addition, geographic inspections that were obtained from an Inspector’s Daily Report contain both types of geographic inspections, those that are part of a geographic assessment as well as those that the inspector notice were in violation while inspecting another property.”

Auditor Comment: We question DOHMH’s comment that the time requirements for pest control activities differ for certain types of geographic inspections. There is nothing in the agency’s procedures to indicate this, and it is contrary to what we were told during the course of the audit. According to agency staff and officials, the time goals apply to all

² This form was replaced with the Initial Inspection form (DRP27).

inspections, whether they were based on personal complaints or were geographic inspections.

For the 86 sampled properties, we saw no evidence that 16 of them were ever inspected. At the exit conference, DOHMH officials provided documentation that they claimed indicated that 14 of these 16 properties were inspected. However, our review of these documents revealed that 12 of the initial inspections either did not relate to the sampled assessments or the inspections were performed as much as three months prior to and as much as 18 months after the relevant date. Only two inspections met the DOH timeliness frame for a valid initial inspection. Accordingly, the number of properties that were not inspected was reduced by only two, to 14 (16%). Failure to inspect properties identified as being potentially susceptible to rodent infestation allows any infestation that may exist to worsen, making remediation efforts more difficult.

***Initial Inspections in Response to Personal Complaints
Not Performed in a Timely Manner***

For personal complaints, only 24 of the 182 sampled properties received a response within 10 business days of DOH's receipt of the complaint. In addition, offices failed to perform an initial inspection for 23 of the sampled properties.

According to the DOH *Policy and Procedure Manual*, PCS is to respond to personal complaints "within 10 business days." To determine DOH's timeliness in responding to personal complaints, we selected a sample of 182 complaints from a population of 3,948 received during the period April 2001 through June 2001. Of these, we saw no evidence that PCS ever responded to 23. For the remaining 159 complaints, only 24 (15%) of them received a response within 10 business days. On average, it took PCS 43 days to respond to these complaints. Table II below summarizes the results of our analysis of PCS's response time for personal complaints.

TABLE II

Summary of PCS Response to Personal Complaints

Time Period	Number of Complaints	Percent of Complaints Receiving Response Within Time Period
1-10 Business Days	24	15.1%
11-20 Business Days	59	37.1%
21-30 Business Days	34	21.4%
31-40 Business Days	14	8.8%
41-50 Business Days	6	3.8%
51-100 Business Days	12	7.5%
More than 101 Business Days	10	6.3%
Total Complaints Received Response	159	100%
Total Complaints with No Response	23	
Total Complaints That Should Have Received Response	182	

In one case involving the Lower East Side office, inspectors responded on May 21, 2002 to a complaint received on June 20, 2001, 227 days earlier. In another case involving the Bronx office, a May 30, 2001, complaint did not receive a response until October 23, 2001, 101 days later. Such delays in inspections could result in an increase in the degree of rodent infestation and create harmful conditions for the humans exposed to the infestation. We acknowledge that the unexpected events of September 11, 2001, may have caused PCS to reassign certain staff members, as reported by DOH in the Mayor's Management Report; however, the complaints cited were received by Central Complaint more than three months prior to that date. Therefore, the timeliness in inspecting these properties would not have been affected by the attacks of September 11 had PCS responded to complaints in a timely manner.

DOH Has No Time Frame for Issuance of 5-Day Letters

DOH has no set time frame for the issuance of 5-Day letters following initial inspections to property owners whose properties are in violation of the Health Code. As a result, there is no benchmark to ensure that the letters are issued in a timely manner. For the sampled properties, the average number of days it took DOH to issue the 5-Day letter was 29—the number of days for issuance ranged from eight to 93 days.

All initial inspection reports are supposed to be reviewed and signed by the inspectors' supervisors. If an inspector identifies a violation, the inspection report is to be forwarded to the Research, which examines the Department of Finance database to identify the property owner. Once the owner is identified, Research is to enter that information in the PCS database. The system generates a letter notifying the owner that he or she has five days to correct the violation noted. Research then mails this 5-Day letter to the property owner.

According to a DOHMH official at the exit conference, Research is required to send the 5-Day letter to the property owner within 10 days after receiving the inspection report from PCS.

However, there is no time frame governing the forwarding of an inspection report to Research. However, since the timeliness of a compliance inspection (performed after the 5-Day letter is sent to determine whether a violation is corrected) is based on when a 5-Day letter is mailed, we reviewed the dates that the 5-Day letters were issued for our sampled properties.

Of the 110³ properties in our sample, there is no evidence that PCS inspected 18 (14 were from the geographic assessments and four were from complaints). Of the remaining 92 properties, violations were identified for 71 (77%) properties. One of these properties was City-owned, so the violation was forwarded to the appropriate City agency to correct the problem. We reviewed PCS files to ascertain when the 5-Day letters were sent for the remaining 70 properties.

Of the 70, we found no evidence that DOH sent the 5-Day letter to the owners of 10 of the properties. At the exit conference, DOHMH officials provided documentation that they stated indicated that a letter was sent to seven of these owners. However, they provided a 5-Day letter for only one of the 10 cases. Accordingly, the number of instances in which DOH failed to send the 5-Day letter is reduced by only one, to nine. For the remaining 61, DOH took 29 days on average following the initial inspections to send the letters to the property owners. A frequency distribution of DOH’s timeliness in issuing the 5-Day letters is summarized in Table III below.

TABLE III

Frequency Distribution of Number of Days Elapsed between
The Initial Inspections and Issuance of 5-Day Letters

Time Frame	Number of 5-Day Letters Issued to Owners	Percent of 5-Day Letters Issued in Time Period
1-10 Business Days	5	8.2%
11-20 Business Days	9	14.8
21-30 Business Days	26	42.6
31-40 Business Days	16	26.2
41-50 Business Days	1	1.6
51-100 Business Days	4	6.6
Total Letters Issued	61	100.0%
Total Letters Not Issued	9	
Total Letters that Should have been Issued	70	

As shown in Table III, approximately 69 percent of the issued letters were sent between 21 and 40 days following the initial inspections. We spoke with the PCS Director of Operations to find out how long the process to identify property owners should take. He stated that it can vary, but it should generally take seven days. PCS will not initiate further remediation efforts until the 5-Day letter is sent to the property owner, providing opportunity to correct the condition.

³ The 110 properties include our sample of 86 properties from the geographic assessments and 24 that came from personal complaints; the 24 are a subset of our larger sample of 182 complaints.

Without a benchmark to measure the timeliness in issuing the letter, DOHMH is hindered in ensuring that delays are minimized and that the letter is sent out as soon as possible.

DOHMH Response: “It is important to note that the time period focused on in the audit was during the implementation phase of the PCS database. During this time, Research and Billing experienced a number of technical problems, including the download of the data from CAMIS to the PCS database, which significantly contributed to the delays in issuing the 5-Day letters. These problems have been resolved; as previously mentioned, the 5-Day letters are issued within an average of three business days after receipt of the inspection from a field office.”

Auditor Comment: We reviewed the overall timeliness in issuing the 5-Day letter following a failed inspection; we did not evaluate the timeliness of the various stages. Although DOHMH states that the 5-Day letter is being issued within three business days on average after Research receives the inspection from PCS, it does not state how long it takes PCS to forward the inspection to Research. Accordingly, we are unable to ascertain whether the overall timeliness in issuing the 5-Day letters has improved since the audit period.

Compliance Inspections Not Performed In a Timely Manner

PCS performed a compliance inspection within the 10-day goal for only 21 (34%) of the 61 properties for which a 5-Day letter was issued. Furthermore, for five of those properties, the compliance inspection was performed within five days of the date that the 5-Day letter was issued, which means that the property owners were not given the five days stated in the letter to correct the condition. The 59 compliance inspections that were performed (there was no compliance inspection for two properties) were conducted an average of 15 days after the 5-Day letter.

For inspections performed for personal complaints, the DOH policy manual specifies that PCS should “perform all compliance inspections within 10 business days following the receipt of the Commissioner’s Five-Day Letter sent to property owners.” For inspections performed under the Enhanced Program, “compliance inspections must be scheduled within two weeks [10 business days] of receiving the [Initial Inspection form] from Research and Billing.”

To determine whether PCS conducted compliance inspections in a timely manner, we reviewed the PCS files and database to determine when the inspections were performed for the 61 sites where violations were noted and a 5-Day letter was issued. Regarding properties inspected under the Enhanced Program, there is no record in the PCS files or database of the date when PCS received the Initial Inspection forms that start the clock for compliance inspections. (The inspection report is returned by Research after the property owner is identified and the 5-Day letter is sent out.) However, since Research forwards the Initial Inspection form to PCS at the same time that the 5-Day letter is sent out, we used the date of the 5-Day letter to assess the timeliness of PCS in performing the compliance inspection. (In assessing timeliness, we started

the clock five days after the date of the 5-Day letter to allow time for the owner to receive the letter.)

We found no evidence of a compliance inspection for two of the 61 properties. In addition, only 21 (36%) of the remaining 59 inspections were performed in a timely manner. Table IV below summarizes the results of our analysis.

TABLE IV

Frequency Distribution of Number of Days Elapsed Between
5-Day Letters and Compliance Inspections

Number of Days Compliance Inspection Was Performed Following the Receipt of the 5-Day Letter*	Number of Compliance Inspections Performed	Percent of Compliance Inspections Performed in Time Period
Within 10 Business Days	21**	35.5%
11-20 Business Days	23	39.0
21-30 Business Days	7	11.9
31-40 Business Days	4	6.8
41-50 Business Days	2	3.4
51-100 Business Days	2	3.4
Total Compliance Inspections Performed	59	100.0%
Total Compliance Inspections Not Performed	2	
Total Compliance Inspections That Should Have Been Performed	61	

*Receipt is assumed to be five days after the date of the letter

**Includes five that were inspected before five days following the date of the letter had elapsed

Overall, the average time PCS took to perform the compliance inspection was less than the time for any other stage in the process. As shown in Table IV, although more than half the compliance inspections were not performed in a timely manner, 44 (75%) of the 59 compliance inspections were performed no later than 20 days following the 5-Day letter. However, this includes five instances in which PCS performed the compliance inspections without allowing the owners adequate time and notice to remediate the problems.

The 5-Day letter states that PCS will re-inspect the property “five [business] days after [the owner] receive[s] this order, or shortly thereafter.” Additionally, the agency’s website states that PCS will perform the compliance inspection “approximately 10 days” after the 5-Day letter is sent to the owner. However, PCS performed five inspections within five days of the date of the letter. For example, for three properties PCS issued the 5-Day letter on November 20, 2001 and performed the compliance inspection on November 26, 2001, four business days later, although the letter states that the owner has five days to correct the condition. In fact, these inspections may have been performed before the owners even received the 5-Day letter.

***Exterminations and Cleanups Not Performed
In a Timely Manner, If At All***

PCS failed to perform exterminations for nine (31%) of the 29 properties recommended for extermination services. For the 20 exterminations that PCS performed, they were conducted 61 days on average after the compliance inspection, well beyond the 10-day standard. Regarding cleanups, PCS failed to perform cleanups for six of the 22 recommended properties. The 16 cleanups that were performed were completed an average of 63 days after the compliance inspection, 43 days beyond the 20-day standard.

PCS procedures call for PCS to perform an extermination, and cleanup if necessary, if a property fails a compliance inspection. As noted above, the DOH manual requires that the extermination should be performed within 10 days following the compliance inspection. If a cleanup is also necessary, it should be initiated within 20 days following the compliance inspection. Of these 31, inspectors recommended only 29 for extermination and 22 for cleanup. (Inspectors failed to recommend extermination or cleanup services for two properties, even though they identified problems. No reason for the failure was provided in the compliance inspection report.)

DOHMH Response: “Many failed compliances do not meet the criteria for extermination and/or cleanup. For example, although there may be violations of the Health Code as they pertain to rodent control there may be no indications of a rodent infestation and, therefore, there is no need for extermination. Open garbage cans with minor spilled garbage may be a violation but there is no need to utilize the resources of a cleanup crew to remediate the violation when for more serious violations requiring cleanup are pending. Subsequent to the audit, inspection reports have been enhanced to capture the Public Health Sanitarians’ judgment as to whether or not remediation in the form of extermination or extermination and cleanup is required.”

Auditor Comment: It is possible that the conditions observed by the inspector did not require that further remediation efforts be performed by PCS. However, this was not indicated in the compliance inspection report; therefore, we are unable to determine whether the decision not to recommend further action was justified and discussed with a supervisor or whether it was merely an oversight in reporting by the inspector. Nevertheless, we are pleased that DOHMH recognizes the need to document such decisions by revising the inspection reports to capture this information.

For the 29 properties recommended for extermination, there was no evidence that PCS performed exterminations at 24. For the 22 properties recommended for cleanup, there was no evidence that PCS performed cleanups at 12. At the exit conference, DOHMH officials provided documentation that indicated that exterminations and cleanups had been performed at another 15 and six properties, respectively.

We should note that we afforded DOH the opportunity to submit this documentation during the course of the audit when we could have verified the information provided, but they did not submit it during that time. Consequently, we are unable to verify the authenticity of these

documents. Since we found no evidence that these documents were falsified, we accepted them. Accordingly, our finding that PCS failed to perform exterminations at nine properties and cleanups at six properties stands. Furthermore, none of the exterminations and cleanups that were performed were completed in a timely manner. Tables V and VI show frequency distributions for the number of days that elapsed after compliance inspections before PCS performed exterminations and cleanups at the recommended properties.

TABLE V

Frequency Distribution of Number of Days Elapsed between Compliance Inspections and Exterminations

Number of Days Extermination Was Performed Following Failed Compliance Inspection	Number of Exterminations Performed	Percent of Exterminations Performed in Time Period
1-10 Business Days	0	0.0%
11-20 Business Days	1	5.0
21-30 Business Days	1	5.0
31-40 Business Days	4	20.0
41-50 Business Days	6	30.0
51-100 Business Days	3	15.0
>100 Business Days	5	25.0
Total Exterminations Performed	20	100.0%
Total Exterminations Not Performed	9	
Total Exterminations That Should Have Been Performed	29	

TABLE VI

Frequency Distribution of Number of Days Elapsed between Compliance Inspections and Cleanups

Number of Days Cleanup Was Performed Following Failed Compliance Inspection	Number of Cleanups Performed	Percent of Cleanups Performed in Time Period
<-20 Business Days	0	0.0%
21-30 Business Days	0	0.0
31-40 Business Days	0	0.0
41-50 Business Days	0	0.0
51-100 Business Days	15	93.8
>100 Business Days	1	6.2
Total Cleanups Performed	16	100.0%
Total Cleanups Not Performed	6	
Total Cleanups That Should Have Been Performed	22	

As shown in Table V, in eight cases, exterminations were performed more than 50 days following the failed compliance inspections; in five cases the exterminations were performed

more than 100 days following the inspections. For one of those, a property in South Brooklyn, an extermination was performed on December 12, 2001, 109 days after the property failed the compliance inspection on July 5, 2001. Regarding cleanups, Table VI shows that it took more than 50 days after the compliance inspection for PCS to perform cleanups at 16 properties. For example, one property in North Brooklyn was cleaned by PCS on January 29, 2002, 114 days after the property failed a compliance inspection on August 13, 2001. We acknowledge that the PCS cleanup efforts were affected by the attacks of September 11, 2001, as stated by DOH in the Mayor's Management Report. (In fact, the cleanup for the above-mentioned property was to have been completed by September 11.) However, we do not believe that the delays in performing the cleanup for this and other properties were primarily due to those attacks. The reassignment of PCS staff persons to assist in the Department's September 11th cleanup efforts was in effect less than one month. Even allowing for this delay, PCS did not perform pest control cleanups in a timely manner. For our sampled properties, the fewest days PCS took to perform a cleanup following a failed compliance inspection was 61 days—41 days over the 20-day requirement.

Failure to perform remediation and cleanup services in a timely manner, if at all, allows the condition to deteriorate further and may necessitate more resources to correct than would be needed if the condition had been addressed more promptly.

At the exit conference in April 2003, DOHMH officials stated that this audit gives a misleading picture of the agency's current pest control efforts. Officials stated that there were two extraordinary situations that took place during our review period that negatively impacted their pest control operations. The first one was the West Nile virus crisis in spring 2001, and the second was the attack on the World Trade Center in September of that year. According to officials, PCS staff were deployed to support DOH efforts to combat the West Nile virus and to clean up after the World Trade Center attack, putting a strain on its resources and affecting the timeliness of its pest control efforts. In addition, officials stated that the period reviewed was two years ago and that they have improved their operations since then. Officials stated that we would find a significant improvement since the audit scope period if we reviewed more recent pest control operations, such as those during Fiscal Year 2002.

We met with DOHMH officials in January 2003 to discuss the audit's findings, at which time we informed them of the significant delays we noted at various stages of the process. At no time did officials identify the deployment of PCS staff to combat the West Nile virus or to assist in the World Trade Center cleanup as a factor in the delays we noted.

Following the exit conference, we asked DOHMH officials to provide us with documentation regarding the two reassignments of PCS staff. According to the documentation DOHMH officials submitted to us, DOH transferred 111 (43%) of 259 PCS staff to the Vector Control unit (the unit responsible for combating the West Nile virus) in May 2001. However, the documentation does not indicate how long the staff were reassigned. Moreover, the figures DOHMH provided do not reconcile with the figures we obtained from PMS. For example, according to the DOHMH documentation, PCS had 161 City Pest Control Aides and 32 crew chiefs in May 2001, but PMS reports that PCS had only 103 City Pest Control Aides and three crew chiefs that fiscal year (Fiscal Year 2001). (As we state in the Scope and Methodology section of this report, we were also unable to obtain a reliable count of the number of persons

employed in PCS during Fiscal Year 2002 because DOH was unable to account adequately for the discrepancies between its figures and the figures we obtained from PMS.) Regarding the deployment of PCS staff to assist in the WTC cleanup efforts, the Fiscal Year 2002 Mayor's Management Report reports that the deployment was for less than one month—September 13, 2001, through October 5, 2001. The documentation submitted by DOHMH extended that time period by only one week, through October 12, 2001. However, the documentation provided by DOHMH shows that PCS staff assisted in the WTC cleanup efforts by working overtime. There is no indication that they assisted in these efforts during their normal working hours, which may mean that they continued to perform their regular duties during this period.

Finally, as stated earlier in the report, DOHMH officials told us that the PCS database was not fully functional until February 2003 and that it had no formal procedures for the Enhanced Program. Therefore, although it is possible that the timeliness in performing pest control activities may have improved in some areas, the weaknesses we identified in regard to oversight would have existed even had we reviewed the PCS operations for a later period.

Recommendations

DOHMH should:

3. Take steps to ensure that the PCS regional offices perform all required pest control work in a timely manner and properly maintain records of the work that is performed in accordance with written procedures.

DOHMH Response: “Timeliness of required Pest Control work is now monitored through the PCS database, which has unique time-sensitive reports for monitoring overdue work. As needed, staff assignments are shifted in response to changing workload demands and staff attrition.”

4. Ensure that supervisors thoroughly review inspection reports and verify that inspectors recommend remediation efforts (e.g., extermination and cleanup) for properties that fail inspection and meet the criteria for remediation.

DOHMH Response: “PHS [Public Health Sanitarian] supervisors do review and sign all inspection reports. However, as noted above, not all failed compliance inspections require extermination and clean up.”

Auditor Comment: As previously stated, for those failed compliance inspections we found no evidence in the compliance inspection reports to indicate that the conditions found did not warrant extermination or cleanup. Nevertheless, we are pleased that DOHMH is revising the reports to include a section for the inspector to note whether or not extermination or cleanup is required.

Sequence of Pest Control Service Steps and Their Time Frames

Step	Infestations Identified by Personal Complaints	Infestations Identified by Geographic Assessments
Process starts when:	Complaint received	Geographic area is targeted and an assessment sheet is prepared
Initial Inspection (or response)	10 days following receipt of complaint	10 days following the preparation of the assessment sheet
If problems found:		
Inspection report Forwarded to Research to identify property owner	No time frame	No time frame
Inspection report returned to PCS and letter sent to property owner requiring owner to correct condition within five days (5-Day letter)	No time frame	No time frame
Compliance Inspection to see whether condition corrected	10 days after property owner receives 5-Day letter	10 days after receiving inspection report back from Research
Extermination performed if condition not corrected	10 days after compliance inspection	10 days after compliance inspection
Cleanup performed, if necessary	20 days after compliance inspection	20 days after compliance inspection

THE CITY OF NEW YORK
DEPARTMENT OF HEALTH AND MENTAL HYGIENE
OFFICE OF THE COMMISSIONER



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June 13, 2003

Greg Brooks
Deputy Comptroller for Policy, Audits, Accountancy & Contracts
The City of New York Office of the Comptroller
Bureau of Audits
1 Centre Street, Room 530 South
New York, New York 10007-2341

Dear Mr. Brooks:

The Department of Health and Mental Hygiene (DOHMH) is responding to the draft Audit Report on the Enhanced Pest Control Program of the Department of Health, dated May 23, 2003. We are pleased that your audit team acknowledges that "PCS is doing a better job at targeting problem areas under the Enhanced [or Geographic] Program than it did under the program's predecessor, the Comprehensive Program." Coupled with steady improvement in staff productivity measures over the last three years, this demonstrates significant and quantifiable improvements in the Program's performance since the Comprehensive Program was discontinued in FY99.

The auditors identified some inconsistencies in the way geographic targeting was being tracked in the period covered by the audit. As we explained at the exit conference, the draft paper-based procedures promulgated during 2001 proved to be cumbersome and unworkable, and have been replaced by an automated clustering system. As the auditors also noted that we were effectively targeting our inspection resources, the significance of this finding should not be overstated.

The data system improvements also address the audit concerns about record-keeping related to follow-up activities. The audit focused on the period from April 2001 through June 2001, when the Pest Control Services Program was in transition from a manual paper-based system to an automated database. This system currently tracks all PCS activities and eliminates most of the physical transfer of paper between various Regional Offices and PCS headquarters, which was still in effect during the audit period. The auditors were informed that this changeover was still ongoing at the time of the audit, that staff were currently undergoing

training to become fully versed in its operation, and that systemic problems were being addressed.

The auditors also determined that our control activities (inspection, extermination, cleanup) did not meet the ambitious time frames set as goals by our Office of Pest Control Services. Through the use of the PCS database, the program now has a much greater capability of tracking its pending work and maximizing its ability to respond in a timely fashion to pending work.

We are concerned about the comments in the draft audit that suggest that we were not forthcoming with information and did not take full opportunity to present our position at meetings before the exit conference. The audit document does not acknowledge that there was complete turnover of the audit team, and that information provided to the first set of auditors may not have been effectively communicated to the new auditors who worked conscientiously to finish the audit. In addition, while a meeting did take place in January, the overall findings were presented orally and with little detail. In fact, the preliminary draft and the exit conference were our first opportunity to review the auditors' data and conclusions.

DOHMH shares with the Comptroller's Office the goal of maximizing the efficiency and efficacy of the Pest Control Services Program. The Program's staff continues to work with diligence and dedication to improve the quality of life and health for all residents of New York City. Over the past three years numerous program changes and systems have been introduced to improve program services. These improvements have resulted in record-breaking increases in performance indicators over the past two years. Although the Department may disagree with some of the findings of the Comptroller's Office, we welcome its recommendations as a catalyst and spur to ongoing program improvement.

Attached to this letter are more detailed comments on the audit report and the response to each recommendation. We appreciate the courtesy and consideration of your audit staff in the performance of this audit. If you have any questions or need further information, please contact Charles Troob, Assistant Commissioner for Business Systems Improvement, at (212) 788-4757.

Sincerely,



Thomas R. Frieden, M.D., M.P.H.
Commissioner

TRF/ct

Response of the Office of Pest Control Services to Draft Audit Report on the Enhanced Pest Control Program of the Department of Health
ME02-059A

"Scope and Methodology," pp. 5-6

Page 5, Fourth Paragraph - To determine whether staff productivity improved under the Enhanced Program...

We are concerned that the auditors were unable to perform an assessment of productivity changes from FY 1997 through 2002. The program went through multiple administrative, organizational and fiscal changes during that timeframe. As a result, no one single office would have been able to provide them with the needed data. Had requests for this information been given to senior agency management, we would have been able to provide data that would have enabled the auditors to comment on this matter. We believe that at least some of the problems here were due to the auditors' request that we distinguish complaint staffing from geographical staffing, a distinction that has no relationship to our actual deployment of staff, who often do both kinds of work in a single day. To put into perspective the size and scope of the program, the following is some data extracted from the Mayor's Management Report.

Fiscal Year	1998	1999	2000	2001	2002
Complaint Inspections	22,394	24,156	19,890	21,807	18,873
Geographic Inspections	27,618	15,726	22,833	28,095	42,132
Total Inspections	50,012	39,882	42,723	49,902	61,005
Exterminations	33,613	51,703	41,721	50,427	63,674

When taken together with the much higher failed initial inspection rate in the Geographic Program (72%) as opposed to the Comprehensive Program (38%), these numbers reflect both improved productivity in terms of absolute numbers and much better targeting of properties and communities for inspectional attention.

"Weaknesses in Administration of Enhanced Protocol." pp. 8-10

Page 8, Fourth Paragraph - To ascertain whether PCS is complying with the requirements of the protocol...

The auditors were attempting to assess the geographic targeting of the Office of Pest Control Services. In doing so, they paid particular attention to a draft protocol on geographic assessment. In fact, the assessment procedures, which called for a description of the problem in a defined area, and a listing and tracking of all inspections, exterminations and cleanups that occurred in that area, were only a very small part of the Geographic program, representing no

more than five to ten percent of all geographic inspections.

In general, Pest Control has two kinds of inspections, those done in response to specific complaints, and those which are "geographically" based, or based on a determination that there is a rodent control problem within a given geographic area. Such a determination can be made in a variety of ways. Geographic inspections are typically scheduled when problematic properties or areas are observed by Pest Control Public Health Sanitarians and Exterminators, or by administrative personnel including Borough Managers and Regional Directors. Most often, the investigation of a complaint about a single property leads to the determination that another property in the area may have rodent problems as well, or have conditions conducive to rodent harborage. Geographic inspections are also based on reports from citizens, community boards, neighborhood organization and elected officials, who report "we have a rodent problem," for example "on Fulton Street," or "in Bushwick." From these very general complaints, a plan is developed by the Regional Office staff to inspect most if not all properties within a defined area (The formal geographic assessments discussed in the audit were applied to this type of situation.) If violations are found, Commissioner 5-Day Letters are issued, compliance inspections occur, and exterminations and cleanups are scheduled if warranted. Reinspections of the properties previously found to be in violation may then occur in succeeding months.

As noted above, there were 28,095 geographic inspections in FY 2001, which includes the period covered by the audit. As already stated, we estimate that that no more than five to ten percent were due to the kinds of assessment and follow-up procedures discussed in the audit. The problems with these new procedures were not typical of the program as a whole, and were not critical to its effectiveness.

At present, geographic targeting is handled as follows:

- An area is identified from one or more sources (noted above) as potential source of rodent activity or harborage.
- The physical area is defined.
- Job tickets with an identifying cluster number are printed for use by the Public Health Sanitarian to conduct inspections.
- One or more Sanitarians are assigned and their work is routed to ensure maximum efficiency and productivity of their time.
- Completed inspection reports are reviewed by the Senior Public Health Sanitarian
- Completed inspection reports are then data entered into the PCS database
- The PCS database is then used to schedule required compliance inspections, exterminations and cleanups.
- Through analysis of the PCS database cluster reports, new complaints from the area, and the demands upon limited staff for assignment to other areas, a determination is made by the Regional Director and Borough Manager if the above process needs to be repeated one or more times in succeeding months and years.

We do not disagree with the auditors' findings that the use of the protocol included in the draft manual was limited—some offices not performing formal assessments, others not updating the data. We simply point out that this was a draft protocol that proved unworkable. PCS did not abandon the notion of Geographic assessments, but rather focused on finding a more efficacious means of performing and tracking those assessments. The result was the development of the PCS cluster report function within the program database to monitor and track all geographic assessments.

"PCS Does Not Meet Response Time Requirements For Its Pest Control Activities" pp 11-19

The auditors point out that our activities do not meet the time frames outlined in our protocols. These time frames are goals, and should not be interpreted as minimum standards. Major attention has been given to improving the timeliness of every part of Pest Control. Although the timeliness data found by the audit falls well short of program goals, the results are reasonably satisfactory.

- Over 73% of all complaints (Table 3) were responded to within 30 business days.
- Over 86% of all compliance inspections (Table 4) were performed within 30 business days from the date of the 5-Day letter.
- The delay in the exterminations (Table V) is substantially attributable to the transfer of staff to WNV and WTC. (See page 5 of this response.)
- The delay in cleanups (Table VI) is also substantially attributable to the transfer of staff to WNV and WTC. (See page 5.)

As was also discussed at the exit conference, during the specific audit period under question, we were heavily impacted by the use of 79 PCS staff – 73 City Pest Control Aides and 6 Exterminators - for West Nile Virus related tasks. This represents approximately 30% of the clean up staff. Later in 2001, 34 PCS staff was also called on to perform emergency work due to the World Trade Center attack in the form of 30 City Pest Control Aides and 4 Exterminators. While the WTC activities took place after the period covered in detail by the audit, it had an impact on our ability to complete the work initiated during the audit period, work that was already negatively impacted by the large staff redeployment to the West Nile Virus program.

Page 6, First Paragraph – We selected part of our sample from assessment sheets prepared by five of the seven regional offices. . . . For one of the remaining offices . . . we selected items from a PCS daily activity report. . . . For the other office . . . we selected properties using an Inspection Report that listed inspections performed under the geographic program.

Inspections performed as part of a geographical assessment may be on a different time schedule in terms of follow-up from geographical inspections that are not part of an assessment. In

addition, geographic inspections that were obtained from an Inspector's Daily Report contain both types of geographic inspections, those that are part of a geographic assessment as well as those that the inspector noticed were in violation while inspecting another property.

Page 13, Second Paragraph – PCS has no set time frame for the issuance of 5-Day letters following initial inspections.

These letters are issued by the Research and Billing Unit and not by PCS. The Research and Billing Unit, upon receipt of the inspection report from a field office does, on average, issue the 5-day letter within three business days.

Page 13, Third Paragraph – Research [and Billing] examines the Department of Finance database to identify the property owner. Once the owner is identified, Research is to enter that information in the PCS database. The system generates a letter notifying the owner that he or she has five days to correct the violation noted. Research then mails this 5-Day letter to the property owner.

The audit does not discuss the procedures followed for ownership identification and the mailing of 5-Day letters. Rather than just "examining the Department of Finance database," Research and Billing utilizes the Department of Finance's FairTax database and Experian to identify the property owner and the block and lot number. Once the owner and block and lot are identified, Research enters this information and the inspection information into the CAMIS (City Agencies Management Information System) database. Information in CAMIS is then (automatically) downloaded into the PCS database to generate the 5-Day letter. A different letter is generated if the property is owned by a governmental entity. It is important to note that the time period focused on in the audit was during the implementation phase of the PCS database. During this time, Research and Billing experienced a number of technical problems, including the download of the data from CAMIS to the PCS database, which significantly contributed to the delays in issuing the 5-Day letters. These problems have been resolved; as previously mentioned, the 5-Day letters are issued within an average of three business days after receipt of the inspection from a field office.

Page 17, First Paragraph--Of these 31 [compliance inspections], inspectors recommended only 29 for extermination and 22 for cleanup. (Inspectors failed to recommend extermination or cleanup services for two properties, even though they identified problems.)

Many failed compliances do not meet the criteria for extermination and/or cleanup. For example, although there may be violations of the Health Code as they pertain to rodent control there may be no indications of a rodent infestation and, therefore, there is no need for extermination. Open garbage cans with minor spilled garbage may be a violation but there is no need to utilize the resources of a cleanup crew to remediate the violation when far more serious

violations requiring cleanup are pending. Subsequent to the audit, inspection reports have been enhanced to capture the Public Health Sanitarians' judgment as to whether or not remediation in the form of extermination or extermination and cleanup is required.

Most properties inspected do not require clean up. Vacant lots (those with no structures) that require clean up are forwarded to the Department of Sanitation that has jurisdiction to clean lots.

In addition, even when the inspector recommends action, it may not be appropriate for PCS to subsequently perform exterminations or cleanups, because the situation may change before we have an opportunity to act. Indeed it would be illegal to exterminate in the absence of indications of active rodent activity.

Page 17, Second Paragraph - We were unable to verify the authenticity of . . . documents [submitted in response to the first draft audit report]. Since we found no evidence that these documents were falsified, we accepted them.

The insinuation that the submitted documents were somehow tainted is unnecessary. At all times throughout the nearly two year audit process, PCS made every effort to cooperate with the auditors and to provide them with requested information that was available.

Page 19, First Paragraph - We met with DOH officials in January 2003 to discuss the audit's findings, at which time we informed them of the significant delays we noted at various stages of the process. At no time did officials identify the deployment of PCS staff to combat the West Nile virus or to assist in the World Trade Center cleanup as a factor in the delays we noted.

At the January meeting the auditors' findings were presented orally and with little detail. The preliminary draft and the exit conference were our first opportunity to review the auditors' data and conclusions.

Page 19, Second Paragraph - Following the exit conference, we asked DOH officials to provide us with documentation regarding the two [West Nile Virus and World Trade Center] of PCS staff. . . . However, the documentation does not indicate how long the staff were reassigned.

Following a five-day training program in April, the 73 cleanup staff and 6 exterminators assigned to the Vector Control program worked in that program from May 15, 2001, and were released in staggered groups through the latter half of September and early October. The 30 cleanup staff and 4 exterminators assigned to the World Trade Center worked from September 19, 2001 to October 6, 2001; some additional cleanups were performed on December 4 and 5, 2001. The assigned cleanup staff cleaned 73 locations, working mostly 12-hour shifts. During the time assigned to WTC activities, cleanup staff did not perform any of their regular tasks. Exterminators performed rodent control measures and monitoring in the WTC area from September 23, 2001 through June 2002. During this time 983 bait stations were installed and

monitored by PCS extermination staff. A total of 2,365 total baitings were performed.

Page 19, Second Paragraph - . . . [D]ocumentation provided by DOH shows that PCS staff assisted in WTC cleanup efforts by working overtime. There is no indication that they assisted in these efforts during their normal working hours, which may mean that they continued to perform their regular duties during this period.

During the time that 34 staff worked at the World Trade Center, they performed these duties during normal business hours and during overtime duties.

Following is the response to the four audit recommendations:

Recommendation #1

- Ensure that PCS offices comply with procedures stated in the Geographic Protocol to better enable the agency to monitor the Enhanced program and track its overall effectiveness.

Response

- The improved database helps us to assure that the geographic program is being effectively managed, including both inspections arising out of the clustering feature and other inspections identified through fieldwork.

Recommendation #2

- Ensure that senior sanitarians cluster properties related to specific assessment in the PCS database so that staff can use the database to check on the status of assessment.

Response

- Senior Sanitarians as well as Regional Directors and Borough Managers are now using the new clustering feature of the database to track all geographic assessments.

Recommendation # 3

- Take steps to ensure that PCS regional offices perform all required pest control work in a timely manner and properly maintain records of the work that is performed in accordance with written procedures.

Response

- Timeliness of required Pest Control work is now monitored through the PCS database, which has unique time-sensitive reports for monitoring overdue work. As needed, staff assignments are shifted in response to changing workload demands and staff attrition.

Recommendation #4

- Ensure that supervisors thoroughly review inspection reports and verify that inspectors recommend remediation efforts (e.g., extermination and cleanup) for properties that fail inspection and meet the criteria for remediation.

Response

- PHS supervisors do review and sign all inspection reports. However, as noted above, not all failed compliance inspections require extermination and clean up.