

AUDIT REPORT



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

Follow-up Audit Report On the Administration of the Enhanced Pest Control Program By the Department of Health and Mental Hygiene

MJ05-135F

June 26, 2006



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 responsibilities of the Comptroller contained in Chapter 5, § 93, of the New York City Charter, my office has audited the Department of Health and Mental Hygiene (DOHMH) to determine whether it has implemented the four recommendations made in a previous audit of the DOHMH's Enhanced Pest Control Program.

DOHMH's Office of Pest Control Services (PCS) enforces the health code regulations pertaining to rodent infestation. Audits such as this provide a means of ensuring that City agencies provide mandated services to the public in an efficient manner.

The results of our audit, which are presented in this report, have been discussed with DOHMH officials, and their comments have been considered in the preparation of this report. DOHMH's complete written response is attached to this report.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "Will C. Thompson, Jr.", with a stylized flourish at the end.

William C. Thompson, Jr.
WCT/ec

Report: MJ05-135F
Filed: June 26, 2006

Table of Contents

AUDIT REPORT IN BRIEF 1

 Audit Findings and Conclusions..... 1

 Audit Recommendations..... 2

 Agency Response..... 2

INTRODUCTION..... 3

 Background..... 3

 Objective..... 4

 Scope and Methodology 4

 Discussion of Audit Results..... 7

RESULTS OF FOLLOW-UP AUDIT 8

 Previous Finding: Regional Offices Do Not Prepare Assessment Sheets
 and Update Assessments in Compliance with the Protocol..... 8

 Previous Finding: PCS Does Not Meet Response Time Requirements
 for Its Pest Control Activities. 9

RECOMMENDATIONS..... 17

ADDENDUM DOHMH Response

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

**Follow-up Audit Report on the Administration of the
Enhanced Pest Control Program by the
Department of Health and Mental Hygiene**

MJ05-135F

AUDIT REPORT IN BRIEF

This follow-up audit determined whether the Department of Health and Mental Hygiene (DOHMH) has implemented the four recommendations made in a previous audit of DOHMH's Enhanced Pest Control Program (*Audit Report on the Enhanced Pest Control Program of the Department of Health*, MJ02-059A, issued June 27, 2003) and corrected the conditions identified in that audit. DOHMH provides a wide variety of programs that promote the health and mental well-being of City residents. It also enforces compliance with the City Health Code. The DOHMH Office of Pest Control Services (PCS) enforces the health code regulations pertaining to rodent infestation. The Enhanced Pest Control Program that was in place during our previous audit and was intended to identify specific geographic areas with rodent problems was discontinued in 2003. In September 2003, DOHMH instituted the Rodent Control Initiative Program (Rodent Initiative). This program targeted three areas that were believed to have the worst rodent infestation and involved the efforts of several City agencies, with DOHMH taking the lead.

Audit Findings and Conclusions

Of the four recommendations made in the previous audit, DOHMH implemented three recommendations and did not implement one recommendation as follows:

First, DOHMH has implemented relevant functions in its PCS database that make the pest control process more automated, thereby allowing for faster processing of pest control work. Second, as recommended, the three regional offices that are participating in the Rodent Initiative used the PCS database to cluster and track pest control activities that were performed in the program. Lastly, supervisors now review compliance inspection reports and ensure that extermination and/or cleanup efforts are recommended when properties fail inspections. DOHMH did not implement the previous recommendation that it have adequate procedures in place to ensure that complaints are addressed in a timely manner.

During this audit, we found that PCS does not have procedures in place to ensure that duplicate complaints are adequately researched and the relevant job tickets closed after determining that the system's categorization of the complaint as a duplicate is correct.

Audit Recommendations

To address the issues that still exist, we recommend that DOHMH:

1. Modify its *Pest Control Services Policy and Procedures Manual, Volume II—Operations* to include specific time requirements for the various stages of the pest control remediation process, detailed procedures for handling duplicate complaints, and procedures for tracking workload.
2. Ensure that the monitoring tools available on the database for tracking the work load and productivity of the regional offices contain accurate and usable information, and that the personnel in the regional offices are using these tools to monitor performance.

Agency Response

DOHMH officials agreed with the audit's recommendations.

INTRODUCTION

Background

The Department of Health and Mental Hygiene (DOHMH) protects and promotes the health and mental well-being of City residents by enforcing compliance with the City Health Code and by providing a wide range of public health programs and services to monitor, prevent, and control disease. DOHMH is the principal agency responsible for addressing rodent infestations in the City. The agency's Office of Pest Control Services (PCS) conducts inspections of properties and determines whether exterminations and property clean-ups are necessary.

As part of its continuing efforts to deal with rodent problems, DOHMH has instituted a number of programs over the years that target certain areas throughout the City with severe rodent problems. These programs work in conjunction with the agency's regular remediation efforts. In August 1997, the Department of Health (as it was known at the time) implemented the Comprehensive Rodent Control Program, targeting 70 areas throughout the City. In October 1999, this program was replaced by the Enhanced Pest Control Program (Enhanced Program). The emphasis of the Enhanced Program was to identify strategic geographic areas with rodent problems (through geographic assessments) and take the necessary remediation actions. Our previous audit (*Audit Report on the Enhanced Pest Control Program of the Department of Health*, MJ02-059A, issued June 27, 2003) covered the Enhanced Program.

The results of the previous audit showed that DOHMH had improved its effectiveness in addressing rodent infestation by targeting problem areas. However, the previous audit also found that DOHMH had weaknesses in the administration of the Enhanced Program and with its follow-up and remediation practices for properties where pest control violations were identified. Specifically, PCS regional offices did not consistently comply with the informal procedures of the Enhanced Program. There were inconsistencies in the manner in which each office administered the program, hindering the agency's ability to monitor its overall effectiveness and identify areas for improvement. PCS also consistently fell short of meeting timeliness goals for performing pest control activities. For example, 158 (87%) of the 182 sampled properties relating to complaints were either inspected late or not at all. Consequently, 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.

The Enhanced Program was discontinued in 2003. In September of that year, DOHMH instituted the Citywide Rodent Initiative Program (Rodent Initiative). This program targeted three areas which were believed to have the worst rodent infestation problems—portions of North Central Brooklyn, South Bronx, and East Harlem—and was to involve the efforts of multiple City agencies, with DOHMH taking the lead.

Regardless of whether pest control activities are to be performed in response to a complaint, as a geographic assessment, or as part of the Rodent Initiative, the remediation process generally consists of up to five stages: (1) initial inspection, (2) issuance of a "5-Day letter," (3) compliance inspection, (4) extermination, and (5) cleanup. An initial inspection

“assesses a property for rodent infestation or conditions conducive to infestations (e.g. harborage, food refuse).” 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 DOHMH Research and Billing Department (Research). Research then sends a “5-Day letter” to the property owner. This letter states that the property owner has five days¹ from receipt of the letter to correct the problem before a PCS inspector conducts a follow-up compliance inspection. If the violation has not been corrected at the time of the compliance inspection, PCS issues a notice of violation to the property owner, performs extermination and cleanup services as needed, and bills the owner for the cost of services.

Other than investigations conducted for rat bite complaints, the PCS Draft *Policy and Procedures Manual, Volume II—Operations* (Manual) has no specific time period within which other required pest control services should be performed. The Manual specifically states that “rat bite reports must be investigated within twenty-four hours of report receipt.” DOHMH also prioritizes complaints that require a written response from either the Commissioner or Assistant Commissioner within two weeks of receipt of the complaint and complaints received by the Office of Emergency Management. However, for all other types of complaints that are received from the general public, the Manual merely states that one of DOHMH quantitative objectives for pest control inspections is “initial inspections conducted soon after the receipt of the complaint.” Moreover, the Manual does not specify how soon after property owners receive their 5-Day letters compliance inspections should be conducted or when any required extermination and cleanup services should be completed following the compliance inspections.

According to the Citywide Accountability Program-HealthTrac data that is posted on the Department’s Web site, in Fiscal Year 2005 the Department received 31,606 pest control-related complaints. This is a 40 percent increase over the 22,595 complaints received in Fiscal Year 2004. DOHMH attributes this increase primarily to the ease with which the general public can register rodent complaints through the 311 Citizen Service Center.

Objective

The objective of this audit was to determine whether DOHMH has implemented the four recommendations made in an earlier Comptroller’s audit, *Audit Report on the Enhanced Pest Control Program of the Department of Health* (MJ02-059A, issued June 27, 2003), and corrected the conditions identified in that audit.

Scope and Methodology

The scope for this follow-up audit was July 1, 2004 through December 31, 2004. To gain an understanding of PCS operating policies and procedures, we interviewed relevant personnel from the DOHMH commissioner’s office, from the PCS main office in Astoria, and from the six PCS regional offices: Queens, North Brooklyn, South Brooklyn, Bronx, East Harlem, and Staten Island.

In addition, we reviewed relevant documents and sources of information such as:

¹ For the purpose of this report, days will always refer to business days unless stated otherwise.

- the draft of the DOHMH Office of Pest Control Services *Policy and Procedure Manual, Volume II—Operations*,
- its *Database Manual*,
- the *Rodent Control Task Force Report to the Mayor*, issued October 2003 (to gain an understanding of the Citywide Rodent Initiative Program),
- the DOHMH Web site, and
- program details available in the Mayor’s Management Reports.

To identify the actions that DOHMH took to implement the four recommendations that were made in the previous audit, we reviewed the Audit Implementation Plan (AIP) prepared by DOHMH in response to those recommendations.

To assess whether DOHMH had in fact implemented the corrective procedures outlined in its AIP and whether the implementation of those procedures corrected the weaknesses cited in the previous report, we conducted tests on personal complaints and geographic assessments handled by DOHMH during our audit scope (see details below). In addition, we looked at the procedures in place for the Rodent Initiative.

We generated from PCS database a list of 24,584 initial inspection job tickets that PCS had issued for complaints and geographic assessments from July 1, 2004 through December 31, 2004. From this list we randomly selected a sample of 100 job tickets on which conduct detailed audit tests. To test the reliability of data in the PCS database, we then randomly selected from that sample a sub-sample of 50 initial inspection job tickets—25 in response to personal complaints and 25 for geographic assessments. To determine whether the data in the PCS database for these tickets accurately reflected the information on the source documents, the following procedure was used. If the database data showed that an initial inspection and a compliance inspection were performed, we traced three key pieces of information to form DRP 27 and form DRP 35, respectively.² We checked whether the type of inspection, the date of the inspection, and the results of the inspection reflected in the database accurately matched the report. To test the completeness of the data in the PCS database, a sample of 60 case files—10 from each of the six field offices—was judgmentally selected. Since the closed files are stored in boxes by address, we selected a box and retrieved those files that contained evidence that pest control was performed during the audit scope period. If the file contained a form DRP 27 and/or a form DRP 35, we traced the three key pieces of information to the database. In all cases, if extermination or cleanup services were performed, those documents were also included in the review.

Our review of the sub-sample of 50 job tickets, covering a total of 153 data entries for initial and compliance inspections (three data entries per form), disclosed that, except in six (4%) instances, the key information on source documents was correctly updated to the database. In the six instances, two DRP 35 forms were absent from the case files although the database showed that a compliance inspection was performed at the properties. In addition, for the 60

² The DRP 27 is the Pest Control Services Work Order for an Initial Inspection, while a DRP 35 is the Pest Control Services Work Order for a Compliance Inspection.

cases where we tested the completeness of information in the database, all key information was completely and correctly recorded on the database.

To assess PCS's timeliness in responding to complaints, Statistical Sampling System software (SSS) was used to randomly select a sample of 50 job tickets resulting from complaints from a population of 14,190 complaints received by DOHMH from July 1, 2004 through December 31, 2004. Our review of PCS's timeliness in responding to complaints was later expanded from the initial sample of 50 complaints to the entire audit population of 14,190 complaints. A Response Time Report was obtained for each of the six regional offices to assess PCS's timeliness in responding to complaints received during the period July 1, 2004 through December 31, 2004. During that period, PCS responded to 8,484 complaints. The average number of days that PCS took for each stage of the pest control process was calculated, beginning with the initial inspection following receipt of a complaint. The frequency distribution of the amount of time taken by PCS to complete different steps in the pest control process was also calculated.

In addition, SSS was used to randomly select 50 job tickets for geographic assessments from a population of 10,394 job tickets issued during the same time period. Data that was retrieved from the PCS database was also reviewed and analyzed for inspection performance.

To determine whether the regional offices that are part of the Rodent Initiative met the milestone dates for pest control activities outlined in the Rodent Initiative Report, we reviewed status reports issued by DOHMH for the program. In addition, a listing was obtained containing the 142 cluster numbers for the job tickets issued by each of the three regional offices for the program. A cluster number represents a group of job tickets. (The offices generate the job tickets from the database, and the system assigns a cluster number when prompted by the PCS staff person.) The cluster number can be used by the regional offices to view on the computer the status of work on the grouped job tickets or to generate cluster reports. A cluster report provides information such as the number of initial and compliance inspections performed, the number of passed and failed inspections, as well as the number of work orders issued for extermination and cleanup and the status of these work orders. We obtained and reviewed 3 cluster reports that were judgmentally selected from the 142 cluster numbers. We also reviewed performance data regarding the program contained in two judgmentally selected Rodent Initiative Monthly Status Reports dated June 9, 2005, and December 7, 2005. In addition, key DOHMH officials were interviewed to determine whether DOHMH assesses its own performance in terms of meeting the objectives of the Rodent Initiative.

The results of the above tests, while not projected to the populations from which they were drawn, provided a reasonable basis for us to assess whether DOHMH had implemented the previous audit's recommendations.

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 audit responsibilities of the Comptroller, 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 DOHMH officials during and at the conclusion of this audit. A preliminary draft report was sent to DOHMH officials and was discussed at an exit conference on May 8, 2006. On May 22, 2006, we submitted a draft report to DOHMH officials with a request for comments. We received a written response from DOHMH on June 8, 2006.

In their response, DOHMH officials agreed with the audit's recommendations stating: "We agree with your recommendation that we should establish specific time requirements for the various stages of the remediation process, and plan to do so. We also agree with the audit recommendation that we clarify some of our other administrative procedures and improve our monitoring tools, although we do not fully agree with the auditors' observations that led to these recommendations."

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

RESULTS OF FOLLOW-UP AUDIT

Previous Finding: **“Regional Offices Do Not Prepare Assessment Sheets and Update Assessments in Compliance with the Protocol”**

The previous audit found that PCS regional offices had not consistently complied with the protocol of the Enhanced Pest Control Program. The protocol in the DOHMH Manual outlined the steps that PCS should have followed to implement the geographic approach of the Enhanced Program. The protocol required that a targeted area be surveyed and the results reported on a geographic assessment sheet. Five of the seven PCS regional offices either had not prepared assessment sheets or had not prepared them prior to inspecting properties, and none of the offices updated the assessments as was required

Also, none of the regional offices had used the clustering function in the PCS database to cluster the properties that they had grouped in geographic assessments. Consequently, the database could not be used to check the status of work in these assessments. Although the offices had been able to check the status of work at a particular property, they could not have checked the status of the entire assessment.

Previous Recommendation #1: “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.”

Previous 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 and other inspections identified through fieldwork”

Current Status: **IMPLEMENTED**

As stated previously, the Enhanced Pest Control Program that was in place during our previous audit was discontinued in 2003, along with the program protocols, and the Rodent Initiative was implemented in September of that year. DOHMH officials stated that the Rodent Initiative is not a replacement for the Enhanced Program. Nevertheless, its mission is similar to that of the Enhanced Program, which is to target special resources to certain areas of the City with severe rodent infestation problems.

Although the Enhanced Program to which this recommendation was addressed has been discontinued, DOHMH has in essence implemented this recommendation in regard to the Rodent Initiative. Our limited review of the Rodent Initiative revealed that pest control activities were performed as stated in the cluster reports and Rodent Initiative Monthly Status Reports provided by DOHMH officials. Although the milestone dates were not always met, our interviews with key personnel from the targeted areas, as well as reviews of Rodent Initiative Monthly Status Reports, show that pest control work was performed as was indicated in the reports.

Previous Recommendation #2: “DOHMH should 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.”

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

Current Status: IMPLEMENTED

The three regional offices that are participating in the Rodent Control Initiative program did use the PCS database to cluster and track pest control activities that were performed in the program.

Our interviews of key PCS personnel responsible for Rodent Initiative services at the North Brooklyn, South Bronx, and East Harlem regional offices, along with our review of cluster reports that were generated from the PCS database, disclosed that the offices are using the clustering feature in the database. The three offices issued a total of 142 cluster numbers—49 from North Brooklyn, 38 from South Bronx, and 55 from East Harlem. According to one PCS official, the clustering feature enables him to check the status of work in a particular area by entering the cluster number of that area in the computer. The cluster report that is generated for the cluster number provides information, such as the number of initial and compliance inspections performed, the number of inspections passed and failed, as well as the number of work orders issued for extermination and cleanup and the status of these work orders.

Previous Finding: “PCS Does Not Meet Response Time Requirements for Its Pest Control Activities”

PCS had not met the time requirements stated in the DOHMH Manual for implementing its pest control activities. Our previous audit testing had found significant delays at all stages of the process, from the initial inspections to the cleanups. Further, all required pest control activities had not been performed.

For complaints related to 182 properties sampled, 23 properties were never inspected; and of the remaining properties, only 24 properties had been inspected within 10 days of receipt of the complaint. For properties that failed an initial inspection, the 5-Day letters had not always been issued to property owners as required. Moreover, when the letters were issued, it had taken PCS an average of 29 days to issue them. For the 61 sampled properties where the 5-Day letters had been issued, compliance inspections had been performed within the stated time standard of a 10-day timeframe at only 21 (34%) of these properties—two properties were never inspected. PCS had also not performed an extermination of 9 of the 29 properties where extermination had been recommended. In fact, it had taken PCS an average of 61 days from the date of the compliance inspection to perform the exterminations.

PCS inspectors had not recommended extermination or cleanup services for two properties, even though they had identified problems during a compliance inspection. The compliance inspection reports had not indicated whether the decision not to recommend further action had been justified and had been discussed with and approved by a supervisor.

DOHMH officials attributed the program's failure to meet time requirements for pest control efforts to the redeployment of staff that took place during the audit scope period as a result of two extraordinary situations: the West Nile virus crisis in the spring of 2001 and the attack on the World Trade Center in September of that year. Officials stated that we would have found a significant improvement subsequent to that audit's scope period if we had reviewed more recent pest control operations.

Previous Recommendation #3: "DOHMH should 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."

Previous 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."

Current Status: NOT IMPLEMENTED

DOHMH does not have adequate procedures in place to ensure that all steps in the process of pest control are completed in a timely manner. PCS does not identify time goals for completing critical remediation steps in the pest control process. In addition, we found no evidence that the six PCS regional offices use the reports available in the PCS database to monitor work required in response to complaints to ensure that required pest control is performed in a timely manner.

The amount of time it took PCS to complete pest control tasks as reported in the previous audit was compared with a corresponding analysis we performed for this follow-up audit and yielded mixed results. For initial inspections and performing cleanup and extermination efforts, PCS's timeliness improved somewhat since the previous audit. For issuing 5-Day letters and performing compliance inspections, its timeliness worsened.

In the previous audit, PCS had timeliness goals for various stages of the remediation process, as follows:

- Initial inspection—10 days following receipt of complaint;
- 5-Day letter (if necessary)—no time frame;
- Compliance inspection (if necessary)—10 days after property owner receives 5-Day letter;
- Extermination (if necessary)—10 days after compliance inspection;
- Cleanup (if necessary)—20 days after compliance inspection.

The Manual no longer has specific number of days as its goals for responding to rodent complaints, except for rodent bites, which must receive a response within one day. Instead, the Manual now has as its response goal: “to respond to rodent complaints as soon as possible after receipt of the complaint.” In addition, the Manual lists as pest control quantitative objectives:

“To respond to all rodent complaints immediately after receipt”

“To perform all compliance inspections soon after property owners . . . receive Commissioner’s Five-Day Letter.”

DOHMH Response: “A management decision was made to remove timeframes from the draft manual since these standards did not reflect the actual operations, resources or seasonal changes of our program. . . . The standards were a goal, not a performance measurement tool. Pest Control Services (PCS) recognizes the importance of having benchmarks for accomplishing the various aspects of our operations in a timely manner and is actively taking steps to implement them.”

Regarding its monitoring procedures, DOHMH stated the “timeliness of required Pest Control work is now monitored through the PCS database, which has unique time-sensitive reports for monitoring overdue work.” These reports include a Response Time Report that may be used by PCS staff to track work performed on complaints. This report provides summary statistics on complaints such as the number of complaints received within a given time period, the actions taken on the complaints, and the outcome of those actions. The Response Time Reports also indicates the average number of days it took for PCS to perform work in response to the complaints.

The time taken by PCS to perform an initial inspection of the 8,484 complaints it received during the scope period was 30 days on average. However, the average varied greatly by regional office, ranging from a low of 18 days for the Staten Island office to a high of 42 days for the North Brooklyn office. Based on our analysis of the information contained in the Response Time Reports, we determined that PCS conducted an initial inspection within 10 days of receiving a complaint in only 33 percent (2,799) of the 8,484 cases it reportedly responded to in Fiscal Year 2005.

Table I shows a frequency distribution for the response times for complaints.

Table I

Frequency Distribution of Response Time for Complaints
Received July 1, 2004 through December 31, 2004

| No. of days to perform an initial inspection | No. of Cases | Percent | Cumulative Percent |
|---|---------------------|----------------|---------------------------|
| 10 days or less | 2,799 | 33.0% | 33.0% |
| 11 – 20 days | 2,138 | 25.2% | 58.2% |
| 21 - 30 days | 1,114 | 13.1% | 71.3% |
| 31 - 40 days | 716 | 8.5% | 79.8% |
| 41 - 50 days | 484 | 5.7% | 85.5% |
| 51 - 100 days | 901 | 10.6% | 96.1% |
| more than 100 days | 332 | 3.9% | 100.0% |
| TOTAL | 8,484 | 100.0% | |

As previously stated, the amount of time it took PCS to complete critical tasks in the pest control process as reported in the previous audit compared with a corresponding analysis we performed for this follow-up audit yielded mixed results. For initial inspections and cleanup and extermination efforts, PCS’s timeliness improved somewhat since the previous audit. For issuing 5-Day letters and performing compliance inspections, its timeliness worsened. The results of this analysis are shown in Table II below.

Table II

Comparison of Average Response Times for
Pest Control Remediation Efforts
Previous Audit vs. Follow-up Audit

| Step In the Pest Control Process | Average Number of days Previous Audit | Average Number of days Follow-up Audit |
|---|--|---|
| Complaint to initial inspection | 43 | 30 |
| Initial inspection to issuance of 5-Day letter | 29 | 81 |
| 5-Day letter to compliance inspection | 15 | 33 |
| Compliance inspection to extermination or cleanup | 61 | 31 |

The absence of established performance time standards limits PCS’s ability to monitor the timeliness of critical tasks in the pest control process. To determine the impact that the

elimination of timeliness goals had on PCS’s pest control efforts since the last audit, we compared PCS’s timeliness in completing critical steps in the pest control process as reported in the previous audit with timeliness data we developed during this follow-up audit. The results are shown in Table III below.

Table III

Comparison of Timeliness in Completing the Critical Steps in the Pest Control Process
Previous Audit vs. Follow-up Audit

| | Complaint to initial inspection | | Initial inspection to issuance of 5-day letter | | 5-Day letter to compliance inspection | | compliance inspection to extermination or cleanup | |
|-----------------|---------------------------------|----------------------------|--|----------------------------|---------------------------------------|----------------------------|---|----------------------------|
| | Avg # of days | % completed within 10 days | Avg # of days | % completed within 30 days | Avg # of days | % completed within 10 days | Avg # of days | % completed within 20 days |
| Previous audit | 43 | 24 | 29 | 56 | 15 | 36 | 61 | 3 |
| Follow-up audit | 30 | 33 | 80 | 9 | 33 | 7 | 31 | 51 |

Shaded boxes represent areas of better performance

As shown in Table III, the timeliness results are mixed. PCS improved its timeliness for performing initial inspections and exterminations and cleanups, but got worse in regard to issuing the 5-Day letters and performing compliance inspections. However, it should be noted that even for those areas where there was improvement, PCS’s performance fell significantly short of its previous time performance standards, even though the factors that it cited in the previous audit as impacting its timeliness—the West Nile virus crisis and the attack on the World Trade Center—were not issues during the audit scope period in this follow-up audit.

At the exit conference, DOHMH stated that a series of database problems occurred during the period June 2004 through October 2004 and contributed to delays in performing pest control tasks. Specifically, DOHMH officials stated that an enhancement of the PCS database to include certain mapping functions caused system failures that resulted in 5-Day letters’ being issued with incorrect information or not being issued at all. This malfunction caused a backlog in the issuance of 5-Day letters, also causing delays in the subsequent steps in the process. Officials stated that the backlog was resolved in August 2005. Nevertheless, DOHMH officials acknowledged that they have not yet established a specific timeframe for pest control tasks. DOHMH should take steps to ensure that a specific timeframe is in place within which required steps in the pest control process are performed. Without set time standards, DOHMH is hindered in ensuring that its remediation efforts are performed without any undue delays.

DOHMH officials stated that during our audit scope period of July 1, 2004 through December 31, 2004, PCS was focused on “fast tracking” the Rodent Initiative rather than addressing rodent complaints. The PCS Director stated that although the number of complaints is an indicator for assessing rodent activity, it is not the best indicator. He stated that number of

complaints is used to identify areas with rodent infestation and to assess the possible effects of pest control activities. According to DOHMH, “since the areas targeted by the Rodent Initiative Program are those with the most historical complaints, we actually circumvented a large volume of would be complaints by doing property inspections.”

As previously stated, the Rodent Initiative was implemented in only three of the six PCS regional areas, namely East Harlem, North Brooklyn, and the Bronx. The three areas that were not part of the Rodent Initiative accounted for 6,179 (44%) of the 14,190 complaints received by DOHMH during our audit scope period. Additionally, since not all of the remaining 8,011 complaints related to properties specifically targeted under the Rodent Initiative, a significant number of them would not have been addressed through the Rodent Initiative. Therefore, the establishment of time standards would be helpful in ensuring that these complaints are addressed in a timely manner.

Previous Recommendation #4: “DOHMH should 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.”

Previous 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.”

Current Status: IMPLEMENTED

For the 16 sampled properties that failed a compliance inspection, the compliance inspection reports show that PCS sanitarians recommended extermination and/or cleanup, and that the senior sanitarian reviewed and signed the inspection reports.

As previously stated, we randomly selected 100 initial inspection job tickets—50 in response to complaints and 50 for geographic assessments. Tests conducted on these tickets disclosed that 51 of the relevant properties failed the initial inspection—26 for complaints and 25 for geographic assessments. Subsequent compliance inspections resulted in violations at a total of 16 properties—9 for complaints and 7 for geographic assessments. Our review of the 16 compliance inspection reports disclosed that that PCS sanitarians recommended extermination and/or cleanup at 15 properties; and that a senior sanitarian signed the reports to indicate his/her review of the document. For the remaining compliance inspection report, the sanitarian did not recommend extermination and/or cleanup of the property because the conditions at the property did not meet PCS criteria for extermination and/or cleanup. In addition, that case was referred to the Department of Sanitation.

New Issue:

DOHMH Should Ensure That It Properly Closes Out Open Job Tickets

During the scope period of this follow-up audit, DOHMH generated 14,190 job tickets for complaints that were received. Of these, 5,706 (40%) were categorized in the Response Time Reports as “Total Complaints with No Action.” When asked for an explanation of the 5,706, the PCS Database Coordinator provided us with a list that identified approximately 4,838 (85%) of the 5,706 as “job complete &/or duplicate” complaints. The remaining 868 job tickets fell into other categories such as street areas that required extermination and complaints that were not addressed for various reasons.

During our audit interviews, we were told by the Coordinator that the database flags a complaint as a duplicate if an initial inspection was performed at the same block and lot number within the past 60 days. (The database uses the block and lot number of a property to categorize these complaints.) However, it is possible for more than one address to have the same block and lot number. At the exit conference, the Coordinator stated that regardless of whether or not an inspection was performed, “the database categorizes a complaint as duplicate based on the same address within a 60-day time frame.” The Coordinator’s statement contradicts the PCS Manual, which states:

“Complaints are considered ‘duplicates’ and marked as such in the database if one of the following conditions is met: (1) an initial inspection, but not a compliance inspection has been performed at the address and/or location within the previous 90 days. (2) If an initial inspection has not been performed, but the address and/or location is routed. (3) If a compliance inspection has been performed at the address and/or location within 30 days of the date of the complaint.”

Further, we were told during our audit interviews that the database categorization of duplicate complaints by address could not be relied on. PCS procedures therefore require that the six regional offices research the duplicate complaints to ensure that the system’s categorization of a complaint as a duplicate is correct. At the exit conference, the Database Coordinator stated that “there have always been procedures in the Database Manual for closing out duplicates and that the database was recently updated to make it more user friendly.” However, neither the PCS Manual nor the database manual offer details of the research steps the offices should follow.

DOHMH Response: “The criteria for determining a duplicate are currently being refined to include, for example, establishment type and apartment number. . . . Once we complete these process revisions we will update our operational and database manuals.”

In order to minimize the possibility that complaints may not receive a response, and considering the volume of duplicate complaints listed in the response reports, PCS needs to ensure that there are detailed and consistent procedures in place to address duplicate complaints, both on the database and in operations. PCS also needs to ensure that the regional offices are following the procedures.

Contrary to what DOHMH stated in its response to the previous audit report and in its AIP, we saw no evidence that the regional offices use the Response Time Report or any other database report to monitor or track pest control work. Further, in order for the Response Time Report to be considered an effective tool for monitoring and tracking pest control work, PCS should ensure that the data presented in the report accurately reflects all pest control activities. For example, the report does not reflect extermination that PCS may have performed at a street area in response to a complaint. According to PCS officials, extermination activity is not included in this report, and job tickets issued for complaints at street areas remain open even though the work may have been done.

DOHMH Response: “In making the recommendation, the auditor cites a relatively minor issue involving the handling of street area exterminations that we believe reflects a lack of understanding of the purpose of the Response Time Report. The Response Time Report was developed for the Commissioner . . . to report on inspection work performed. While exterminations are also captured in this report, they are included in the ‘Other’ category and therefore the report does not contain statistics specifically on exterminations. We are evaluating the Response Time Report and adding extermination work to make it more useful. . . . The auditors comment that exterminations are not fully reported because street area exterminations are kept ‘open.’ This is a valid and minor issue. The program decided to keep extermination work ‘open’ until exterminators in the field deemed that the rodent problem has been sufficiently mitigated. However, we are evaluating this policy in light of broader operational changes being considered, and expect to automate closure of extermination work based on additional criteria.”

Auditor Comment: In response to our request for the Inspection and Work Order Report that is listed in the database manual, the Response Time Report was provided to us to be used as a tool to check PCS’s response to complaints and any subsequent pest control work performed at the properties involved in the complaints. As was previously stated, our analysis of the response reports for the six regional offices collectively had 40 percent of complaints categorized as “Total complaints with No Action.” This means that the Initial Inspection job tickets issued by PCS when these complaints were received remain open in the database. We were subsequently informed by the Database Coordinator that initial inspection job tickets for street areas where PCS is required to perform an extermination, and not an initial inspection, were included in these open job tickets. If the required extermination was performed in response to the complaint, then the database should be updated to reflect that PCS has acted on the complaint.

PCS officials informed us at the exit conference that the Response Time Report was intended for manager use and did not exist during the period covered by this audit, July 1, 2004 through December 31, 2004. They also stated that there are other reports in the database that the managers use. However, the officials also conceded that there were some database problems. According to the Database Coordinator, an enhancement made to the database resulted in incompatible triggers that caused the database report-generation feature to malfunction. The Coordinator stated that “PCS is in the process of restructuring the current database with reports for the managers to utilize.”

RECOMMENDATIONS

To address the issues that still exist, we recommend that DOHMH:

1. Modify its Pest Control Services *Policy and Procedures Manual, Volume II—Operations* to include specific time requirements for the various stages of the pest control remediation process; detailed procedures for handling duplicate complaints; and for tracking workload.

DOHMH Response: “Pest Control Services (PCS) recognizes the importance of having benchmarks for accomplishing the various aspects of our operations in a timely manner and is actively taking steps to implement them.”

2. Should ensure that the monitoring tools available in the database for monitoring and tracking the work load and productivity of the regional offices contain accurate and usable information, and that the personnel in the offices are using these tools to monitor performance.

DOHMH Response: “We agree with the recommendation; PCS is committed to improving monitoring tools and procedures.”

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June 6, 2006

John Graham, Deputy Comptroller
Audits, Accountancy & Contracts
Office of the Comptroller
1 Centre Street
New York, NY 10007-2341

Re: Draft Follow-up Audit Report on
Administration of Enhanced Pest
Control Program by DOHMH,
MH05-135F

Dear Mr. Graham:

We have reviewed the draft report. Our comments are attached.

We are pleased that this audit acknowledges that three of the previous four recommendations have been implemented. We agree with your recommendation that we should establish specific time requirements for various stages of the remediation process, and plan to do so. We also agree with the audit recommendations that we clarify some of our other administrative procedures and improve our monitoring tools, although we do not fully agree with the auditors' observations that led to these recommendations.

We appreciate the courtesy and professionalism of your staff in the performance of this audit. If you have any questions or need further information, please contact Thomas Hardiman, Director, Internal and External Audits, at (212) 219-5285.

Sincerely,

A handwritten signature in black ink, appearing to be 'TRF', written over a horizontal line.

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

TRF/mc

Response to the Audit Report: Follow-up Audit Report on the Administration of the Enhanced Pest Control Program by the Department of Health and Mental Hygiene.

Audit Number: MJ05-0135F

Introduction

Pest Control Services thanks the Office of the Comptroller for their diligence in completing the Pest Control Services audit. We are pleased that the audit recognizes that that our program has implemented all but one of the recommendations from our previous audit. We share with the Comptroller's Office the goals of improving our program's efficiency. The following response addresses the findings and recommendations.

Recommendation 1

Modify its Pest Control Services Policy and Procedures Manual to include specific time requirements for the various stages of the pest control remediation process; detailed procedures for handling duplicate complaints; and for tracking workload.

Response 1-

A) Timeframes:

A management decision was made to remove timeframes from the draft manual since these standards did not reflect the actual operations, resources or seasonal changes of our program. Pest Control complaints had always been subject to informal prioritization, and complaint response had always fluctuated with the seasonal shifting of some personnel to other functions. The standards were a goal, not a performance management tool.

Pest Control Services (PCS) recognizes the importance of having benchmarks for accomplishing the various aspects of our operations in a timely manner and is actively taking steps to implement them.

In order to ensure that we provide most effective rodent control services that we can within our resources, we have implemented a neighborhood approach to remediation, and are in the process of developing systems for prioritizing complaints from the public. The criteria that we are considering for prioritizing complaints could include: the complaint/rodent infestation history of the neighborhood of origin of the complaint, the number of previous complaints at the address of the complaint, and the presence of Active Rodent Signs (physical signs that rodents are present such as borings, droppings, etc.) at previous inspections done at that address. Response and completion timeframes for pest control remediation will be developed based on the complaint's priority designation. PCS is carefully considering resource constraints and opportunities for

process improvement and is diligently working towards developing reasonable timeframes.

The audit states that our lack of timeframes hindered us from performing pest control remediation in a timely manner; however it may be more accurate to say that the program did not have the infrastructure in place to handle the 40% increase in complaints that was due to the opening of the 311 Complaint Center to the public in the Spring of 2004. Computer malfunctions also caused delays in the issuance of 5-Day Letters and the subsequent compliance inspections.

The program has been working closely with the new director of the Department's Research and Billing Unit to address their needs and to develop workable timeframes for both our programs. As noted in the audit, any delay in issuing five day letters affects PCS's ability to perform the subsequent compliance inspections.

B) Identifying and closing Duplicate Complaints:

Our Database Manual states that:

“The duplicate folder is where all complaints with the same exact address received within 60 days will be stored. It is the responsibility of each office to check this folder on a regular basis...First check each job ticket (complaint) for duplication...if it is determined that the job ticket is a true duplicate select the JC-Job Complete button to close out the complaint. If it is not a duplicate, then select the NI-New Inspection button and the job ticket will be re-routed to the New Complaints folder for printing.”

Our data entry staff have been trained, and does follow the above procedures for identifying and closing duplicates. However, the criteria for determining a duplicate are currently being refined to include, for example, establishment type and apartment number. We are also evaluating whether the number of days should be reduced from 60 to 30. The duplicate identification process is also being evaluated for automation.

Once we complete these process revisions we will update our operational and database manuals.

C) Tracking PCS Work:

Regional Directors and Managers track PCS's work via the 11 database reports available in the database. Managers have to ensure that their office provides PCS's Central Office with bi-weekly data for preparation of the Mayor's Management Report. Therefore, Managers and Regional Directors have to monitor the data to ensure that the data entered is accurate and timely, and that all necessary remediation work is being performed.

Our Operations Manual states that the Borough Manager's responsibilities include:

- Monitoring and managing all programmatic data and records within their assigned regions

The Regional Director's responsibilities include:

- Ensuring that all data is entered into the PCS database accurately and in a timely way
- Preparing narrative and statistical reports
- Monitoring the administrative and data processing functions
- Evaluating and track staff performance for productivity effectiveness
- Verifying that there is no backlog of complaint work (i.e. not downloaded into the database from 311 or other sources)

The manual will be revised to be more specific and to include the functions we are currently performing. Managers, for instance, perform a 5% check for accuracy of the work entered into the database. In addition, the program's Database Coordinator and Director have the ability to check on the status of work from the PCS's Central Office location.

Recommendation 2

Should ensure that the monitoring tools available in the database for monitoring and tracking the work load and productivity of the regional offices contain accurate and usable information, and that the personnel in the offices are using these tools to monitor performance.

Response 2

We agree with the recommendation; PCS is committed to improving monitoring tools and procedures. However, in making the recommendation, the auditor cites a relatively minor issue involving the handling of street area exterminations that we believe reflects a lack of understanding of the purpose of the Response Time Report.

The Response Time Report was developed for the Commissioner of the Department of Health and Mental Hygiene, to report on inspection work performed. While exterminations are also captured in this report, they are included in the "Other" category and therefore the report does not contain statistics specifically on exterminations. We are evaluating the Response Time Report and adding extermination work to make it more useful. Nonetheless, the current database does have the "Number of Work Orders" report, which captures exterminations.

The auditors comment that exterminations are not fully reported because street area exterminations are kept "open." This is a valid but minor issue. The program decided to keep extermination work "open" until exterminators in the field deemed that the rodent problem had been sufficiently mitigated. However, we are evaluating this policy in light of broader operational changes being considered, and expect to automate closure of extermination work based on additional criteria.