



Housing Authority of the City of Durham, NC

Section 8 Housing Choice Voucher Program Housing Quality Standards



To: Michael A. Williams, Director of Public and Indian Housing, Greensboro, NC, 4FPH

From: //signed//
Nikita N. Irons, Regional Inspector General for Audit, 4AGA

Subject: The Housing Authority of the City of Durham, NC, Did Not Adequately Enforce HUD's and Its Own Housing Quality Control Standards

Attached is the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our review of the Housing Authority of the City of Durham's Section 8 Housing Choice Voucher program housing quality standards.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, Title 5 United States Code, section 8M, requires that OIG post its publicly available reports on the OIG Web site. Accordingly, this report will be posted at <http://www.hudoig.gov>.

If you have any questions or comments about this report, please do not hesitate to call me at (404)-331-3369.



Audit Report Number: 2016-AT-1005

Date: May 10, 2016

The Housing Authority of the City of Durham, NC, Did Not Adequately Enforce HUD's and Its Own Housing Quality Standards

Highlights

What We Audited and Why

We audited the Housing Authority of the City of Durham's Section 8 Housing Choice Voucher program's housing quality standards based on our recent audit¹ of the Authority's program, during which potential issues with the Authority's inspections were noted, and as part of our annual audit plan. Our audit objective was to determine whether the Authority ensured that program units met the U.S. Department of Housing and Urban Development's (HUD) and its own housing quality standards.

What We Found

The Authority did not always ensure that program units met HUD's and its own housing quality standards. Of 75 program units inspected, 69 failed to comply with HUD's minimum housing quality standards and the Authority's own requirements, and 40 of those were in material noncompliance with the standards. For the 40 units in material noncompliance, the Authority's inspectors failed to observe or report 352 violations that existed when they conducted their last inspections. As a result, some tenants lived in inadequately maintained units, and the Authority disbursed more than \$100,000 in housing assistance payments and received more than \$8,000 in administrative fees for the 40 units in material noncompliance. Unless the Authority improves its inspection program and ensures that all of its units materially meet minimum housing quality standards, we estimate that over the next year, HUD will pay about \$7.5 million in housing assistance for units in material noncompliance with the standards.

What We Recommend

We recommend that the Director of HUD's Greensboro Office of Public and Indian Housing require the Authority to (1) reimburse its program more than \$108,000 from non-Federal funds for the 40 units that materially failed to meet HUD's and its own housing quality standards, (2) ensure that all violations cited for the units failing to meet housing quality standards have been corrected, and (3) implement adequate procedures and controls to ensure that all units meet HUD's and its own housing quality standards to prevent more than \$7.5 million in program funds from being spent on units that do not comply with HUD's requirements over the next year.

¹ Audit report 2015-AT-1011, issued on September 30, 2015, focused on tenant eligibility.

Table of Contents

Background and Objective.....	3
Results of Audit	4
Finding: The Authority Did Not Always Ensure That Program Units Met HUD’s and Its Own Housing Quality Standards.....	4
Scope and Methodology.....	11
Internal Controls.....	13
Appendixes.....	14
A. Schedule of Questioned Costs and Funds To Be Put to Better Use.....	14
B. Auditee Comments and OIG’s Evaluation.....	15
C. Schedule of OIG Housing Quality Standards Inspection Results	18

Background and Objective

The Housing Authority of the City of Durham, NC, was established under chapter 456 of the State of North Carolina public laws of 1935 as amended. The Authority's mission is to be a leader for affordable housing in Durham County by serving as a housing safety net, promoting individual self-sufficiency, leveraging core housing competency to support the Authority's mission, managing real estate, and facilitating and participating in mixed-income housing development.

The Authority is a nonprofit municipal corporation governed by a seven-member board of commissioners. The board is composed of active public servants who are appointed by the Durham City Council. The board's responsibilities include setting policies and appointing the Authority's chief operating officer, who is in charge of the Authority's day-to-day operations.

The Authority administers public housing and Section 8 Housing Choice Voucher programs funded by the U.S. Department of Housing and Urban Development (HUD). The Section 8 Housing Choice Voucher program provides assistance to low- and moderate-income individuals seeking decent, safe, and sanitary housing by subsidizing rents with owners of private housing. The Authority administers more than 2,300 tenant-based housing choice vouchers and received more than \$87 million in program funding for fiscal years 2011 through 2015.

The goal of the Housing Choice Voucher program is to provide decent, safe, and sanitary housing at an affordable cost to low-income families. To accomplish this goal, program regulations include basic housing quality standards, which all units must meet before assistance can be paid on behalf of a family and at least annually throughout the term of the assisted tenancy. Housing quality standards define "standard housing" and establish the minimum criteria necessary for the health and safety of program participants. In addition to complying with HUD's housing quality standards, section 8-IB of the Authority's program administrative plan requires the Authority to comply with its own requirements, including the City of Durham's housing code.

Our objective was to determine whether the Authority ensured that program units met HUD's and its own housing quality standards.

Results of Audit

Finding: The Authority Did Not Always Ensure That Program Units Met HUD's and Its Own Housing Quality Standards

The Authority did not always ensure that program units met HUD's and its own housing quality standards. Of the 75 program units inspected, 69 did not meet minimum housing quality standards, and 40 of those were in material noncompliance with HUD standards. The violations occurred because the Authority's inspectors were not properly trained and lacked sufficient knowledge of HUD's and its own housing quality standards. As a result, some tenants lived in inadequately maintained units, and the Authority disbursed more than \$100,000 in housing assistance payments and received more than \$8,000 in administrative fees for the 40 units in material noncompliance with the standards. Unless the Authority improves its inspection program and ensures that all program units materially meet minimum housing quality standards, we estimate that over the next year, HUD will pay about \$7.5 million in housing assistance for units in material noncompliance with the standards.

Housing Quality Standards Not Met

We statistically selected 75² units from a universe of 498 program units that had passed an inspection by the Authority between June 1 and August 31, 2015. The 75 units were selected to determine whether the Authority ensured that its program units complied with HUD's and its own housing quality standards. We inspected the 75 units from October 14 through December 2, 2015. The Authority's staff accompanied us during our inspections and was made aware of the results of each inspection.

Of the 75 units inspected, 69 (92 percent) had a total of 616 housing quality standards violations, 408 of which predated the Authority's last inspection. In addition, 40 units containing 493 violations were in material noncompliance with housing quality standards, of which 352 violations predated the Authority's last inspection. Of the 40 units that materially failed the inspection, 25 were found to have a total of 30 life-threatening fail items requiring correction within 24 hours, which existed at the time of the Authority's latest inspection. We considered these units to be in material noncompliance because they had at least five health and safety violations or at least one 24-hour violation that predated the Authority's last inspection or a combination of both conditions. Appendix C categorizes the results of all 75 units inspected. The Authority disbursed \$100,214 in program housing assistance payments for the 40 units that materially failed to meet HUD's and its own housing quality standards and received \$8,176 in program administrative fees. The following table lists the 7 most frequently occurring violations for the 40 units that materially failed to meet HUD's housing quality standards.

² Our methodology for the statistical sample is explained in the Scope and Methodology section of this audit report.

Violation category	Number of violations	Number of units
Windows	123	33
Doors	66	27
Electrical	62	30
Exterior, foundations, site conditions, exterior debris, etc.	49	22
Baths, sinks, showers, toilets, and vents	42	22
Floors	39	25
Walls	23	14

Types of Deficiencies

The following photographs illustrate some of the violations noted during our housing quality standards inspections of the 40 units that materially failed to meet HUD’s standards. The most common deficiencies were windows, doors, and electrical contacts.

Windows

A total of 148 window violations were found in 48 units that failed to meet housing quality standards.



The picture above shows a kitchen window being kept closed with screws, not allowing exit in case of an emergency and not allowing for ventilation.

Doors

A total of 82 door violations were found in 40 units that failed to meet housing quality standards.



The picture above shows a keyed deadbolt lock on the kitchen exit door. If the tenant cannot find the key, exit would be blocked in case of emergency.

Electrical

A total of 80 electrical violations were found in 41 units that failed to meet housing quality standards. HUD regulations at 24 CFR (Code of Federal Regulations) 982.404 provide that if a life-threatening violation is noted, it must be corrected within 24 hours of the inspection. Among other items, the Authority defined any electrical problem or condition that could result in shock or fire as a life-threatening violation requiring correction within 24 hours of discovery. Of the 80 electrical violations, 30 were emergency (life-threatening) violations causing electric hazard such as shock or fire.



The picture above shows that the cover on an electric meter box is missing the seal and can be easily opened, exposing electrical contacts and creating an electrical hazard such as shock.

We also found other health and safety hazards violations, including unsafe water heater conditions, cracked foundations, and ceiling deficiencies such as large holes. The following photographs show examples of these types of violations noted during our inspections of the units.



The picture above shows a water heater with an unsteady foundation, allowing it to be easily knocked over, causing injury to tenants or damage to the unit.



The picture above shows a large crack in the unit's foundation. allowing water, air, and insect infiltration.



The picture above shows a large hole in a closet ceiling through which pipes are passing. The large hole allows for vermin, dust, and air infiltration.

Lack of Adequate Training

The Authority is required by HUD and its administrative plan to inspect Section 8 units at least once a year to ensure that the properties meet minimum conditions for compliance with housing quality standards. HUD requires and the Authority's administrative plan provides minimum conditions that must exist for a unit to be considered decent, safe, and sanitary. Each unit must meet minimum housing quality standards for the entire period of tenancy.

We found 408 deficiencies that existed at the time of the Authority's most recent inspections, but the inspectors did not identify or report them. Keyed deadbolt locks, electrical hazards (unsecured meter boxes, missing outlet covers, etc.), missing or damaged window screens,

ceiling damage from water leaks, an improper smoke detector installation, and improper spacing on handrail spindles were some of the deficiencies not reported by inspectors.

Although the Authority's inspection staff had received some housing quality standards inspection training, the training vendor was not always the same, the training was at least 3 years old, and none of the staff members had been trained on the City of Durham's local housing code, which was included in the Authority's administrative plan. All three of the Authority's inspectors stated that they had not had formal training on the local housing codes. The lack of adequate training resulted in the inspectors failing to perform complete and accurate inspections in accordance with HUD's and the Authority's own requirements. Of the 75 units inspected, 69 (92 percent) failed the inspection. In addition, 40 of the units inspected materially failed, with a total of 352 fail items that existed at the time of the Authority's latest inspection. Of greater concern, of the 40 units that materially failed the inspection, 25 were found to have a total of 30 life-threatening fail items requiring correction within 24 hours, which existed at the time of the Authority's latest inspection.³

Conclusion

HUD regulations at 24 CFR 982.401(a)(3) require that all program housing meet housing quality standards, both at commencement of assistance and throughout the assisted tenancy. In addition, in accordance with 24 CFR 982.152(d), HUD is permitted to reduce or offset program administrative fees paid to a public housing agency if it fails to correctly or adequately meet its administrative responsibilities, such as enforcing housing quality standards. Based on our review, the Authority did not always ensure that its program units complied with HUD's and its own housing quality standards. The violations occurred because the Authority's inspectors were not adequately trained and lacked sufficient knowledge of HUD's and the Authority's own housing quality standards. As a result, some tenants lived in inadequately maintained units, and the Authority disbursed \$100,214 in housing assistance payments and received \$8,176 in administrative fees for the 40 units in material noncompliance. Unless the Authority improves its inspection program and ensures that all of its units materially meet minimum housing quality standards, we estimate that over the next year, HUD will pay more than \$7.5 million in housing assistance for units in material noncompliance with its standards.

Recommendations

We recommend that the Director of HUD's Greensboro Office of Public and Indian Housing require the Authority to

³ Regulations at 24 CFR 982.404(a)(1)(3)-(4) provide that the Authority must not make any housing assistance payments for a dwelling unit that fails to meet HUD's housing quality standards unless the owner or family, whichever is responsible, corrects the defect within the period specified by the Authority and the Authority verifies the correction. If a defect is life threatening, it must be corrected within no more than 24 hours.

- 1A. Reimburse the program \$108,390 from non-Federal funds for housing assistance payments (\$100,214) and administrative fees received (\$8,176) for the 40 units that materially failed to meet HUD's and its own housing quality standards.
- 1B. Ensure that the housing quality standards violations have been corrected for the 69 units cited in this finding and certify that the units meet the standards.
- 1C. Implement adequate procedures and controls to ensure that all program units meet HUD's and Authority's own housing quality standards to prevent \$7,560,158 in program funds from being spent on units that do not comply with requirements over the next year. The procedures should include but not be limited to ensuring that inspectors are properly trained and familiar with HUD's and the Authority's requirements to ensure that they conduct complete and accurate inspections.

Scope and Methodology

We performed our onsite audit work between October and December 2015 at the Authority's central office located at 330 East Main Street, Durham, NC. The audit covered the period January 1 through August 31, 2015, but was expanded as necessary.

To accomplish our audit objective, we interviewed the Authority's employees. In addition, we obtained and reviewed the following:

- Applicable laws, HUD's regulations at 24 CFR Parts 5 and 982, Office of Public and Indian Housing notices, HUD's Guidebook 7420.10G, and HUD's Housing Inspection Manual.
- The Authority's 2014 program administrative plan; policies and procedures; chart of accounts; bank statements; general ledger; annual audited financial statements for fiscal years 2012, 2013, and 2014; board meeting minutes for January through August 31, 2015; and housing assistance payments register.

We statistically selected a stratified systematic sample of 75 of the Authority's program units to inspect from the 498 units that passed the Authority's inspections from June 1 through August 31, 2015. The 75 units were inspected to determine whether the Authority ensured that its program units met HUD's and its own housing quality standards. We used statistical sampling because each sampling unit was selected without bias from the audit population, thereby allowing the results to be projected to the population. After our inspections, we determined whether each unit passed, failed, or materially failed. All units were ranked, and we used our materiality standards and auditors' judgment to determine the material cutoff point. Materially failed units were those that had one or more exigent (24-hour) health and safety violations that predated the Authority's previous inspections, five or more health and safety violations that predated the Authority's previous inspections, or a combination of both.

Based on our review of the 75 statistically selected units, we found that 40 of the units had material failures in housing quality standards, although they had recently passed an Authority inspection. Using a one-sided confidence interval of 95 percent, we projected that at least 43.7 percent of the units had material violations. Extending this rate to the monthly count of 2,324 occupied units on the Authority's program, we can say that at least 1,017 units would not have complied with housing quality standards or the requirements in the Authority's program administrative plan, despite having passed the Authority's inspection.

Based on the average housing assistance paid for the 75 units, less a deduction to account for a statistical margin of error, we can say with a one-sided confidence interval of 95 percent that the

average amount of monthly housing assistance spent on inadequate units was \$271⁴ per unit. Extending this amount to the 2,324⁵ active units on the Authority's program over 12 months yields at least \$7.5 million in monthly housing assistance paid per year for substandard units.

The calculation of administrative fees was based on HUD's administrative fee per household month for the Authority. The fees were considered inappropriately received for each month in which the housing assistance was incorrectly paid for units that materially failed to meet HUD's minimum and its own housing quality standards. If the questioned period was less than a full month, we limited the questioned administrative fee to a daily rate, based on the number of days during which the unit did not materially comply with HUD's requirements.

We relied in part on computer-processed data contained in the Authority's systems to achieve our audit objective. Although we did not perform a detailed assessment of the reliability of the data, we performed a minimal level of testing and found the data to be adequately reliable for our purposes. We provided our review results (inspection reports and pictures) to HUD's Greensboro Office of Public Housing and the Authority's management during the audit.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective(s). We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

⁴ This amount was rounded for reporting purposes.

⁵ The dollar valuation projection estimation is independent of the unit count projection estimation; to be statistically correct each was calculated using a different method.

Internal Controls

Internal control is a process adopted by those charged with governance and management, designed to provide reasonable assurance about the achievement of the organization's mission, goals, and objectives with regard to

- Effectiveness and efficiency of operations,
- Reliability of financial reporting, and
- Compliance with applicable laws and regulations.

Internal controls comprise the plans, policies, methods, and procedures used to meet the organization's mission, goals, and objectives. Internal controls include the processes and procedures for planning, organizing, directing, and controlling program operations as well as the systems for measuring, reporting, and monitoring program performance.

Relevant Internal Controls

We determined that the following internal controls were relevant to our audit objective:

- Effectiveness and efficiency of operations – Policies and procedures that management has implemented to reasonably ensure that a program meets its objectives.
- Reliability of financial reporting – Policies and procedures that management has implemented to reasonably ensure that valid and reliable data are obtained, maintained, and fairly disclosed in reports.
- Compliance with applicable laws and regulations – Policies and procedures that management has implemented to reasonably ensure that resource use is consistent with laws and regulations.

We assessed the relevant controls identified above.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, the reasonable opportunity to prevent, detect, or correct (1) impairments to effectiveness or efficiency of operations, (2) misstatements in financial or performance information, or (3) violations of laws and regulations on a timely basis.

Significant Deficiency

Based on our review, we believe that the following item is a significant deficiency:

- The Authority's inspectors were not properly trained and lacked sufficient knowledge of HUD's and its own housing quality standards (finding).

Appendixes

Appendix A

Schedule of Questioned Costs and Funds To Be Put to Better Use

Recommendation number	Ineligible 1/	Funds to be to better use 2/
1A	\$108,390	
1C		\$7,560,158
Totals	\$108,390	\$7,560,158

- 1/ Ineligible costs are costs charged to a HUD-financed or HUD-insured program or activity that the auditor believes are not allowable by law; contract; or Federal, State, or local policies or regulations.
- 2/ Recommendations that funds be put to better use are estimates of amounts that could be used more efficiently used if an Office of Inspector General (OIG) recommendation is implemented. These amounts include reductions in outlays, deobligation of funds, withdrawal of interest, costs not incurred by implementing recommended improvements, avoidance of unnecessary expenditures noted in preaward reviews, and any other savings that are specifically identified. In this instance, if the Authority implements our recommendations, it will stop incurring program costs for units that are not decent, safe, and sanitary and, instead, will spend those funds in accordance with HUD's requirements and the Authority's program administrative plan. Once the Authority improves its controls, this will be a recurring benefit. Our estimate reflects only the initial year of this benefit.

Appendix B


Auditee Comments and OIG's Evaluation

Ref to OIG Evaluation

Auditee Comments

Comment 1

Comment 1



DHA
Durham Housing Authority

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A Commitment to Quality Living

April 7, 2016

Ms. Nikita N. Irons
Regional Inspector General for Audit
U.S. Department of Housing and Urban Development
Office of Inspector General
Office of Audit (Region IV)
75 Spring Street SW., Room 330
Atlanta, GA 30303

RE: OIG draft audit report titled, "The Housing Authority of the City of Durham, NC, Did Not Adequately Enforce HUD's and Its Own Housing Quality Standards."

Dear Ms. Irons:

The Housing Authority of the City of Durham ("DHA") reviewed the above referenced draft audit report and appreciates this opportunity to submit its response and corrective actions to address the finding listed. DHA concurs with the one finding and three recommendations detailed in the audit report. DHA does not concur that the lack of adequate training resulted in the inspectors failing to perform complete and accurate inspections, in accordance with HUD's and the Authority's own requirements. Each inspector has extensive working knowledge of the City of Durham housing code, which in some cases, is not as stringent as HQS. In general, the Durham City Code is more specific on how criteria is evaluated. Accordingly, DHA has already begun to implement specific recommendations to improve upon the Housing Quality Standards ("HQS") inspection process. Below is DHA's response to the OIG finding and recommendations.

OIG Recommendation 1A: Reimburse the program \$108,390 from non-Federal funds for housing assistance payments (\$100,214) and administrative fees (\$8,176) for the 40 units that materially failed to meet HUD's and its own housing quality standards.

DHA Response: DHA will reimburse the program in the amount of \$108,390 from non-Federal funds. The agency will collaborate with the HUD Greensboro Field Office to request a repayment agreement and verify the appropriate source of funds to reimburse the program.

OIG Recommendation 1B: Ensure the housing quality standards violations have been corrected for the 69 units cited in this finding and certify that the units meet the standards.

**Ref to OIG
Evaluation**

Auditee Comments

Comment 1

Letter to Nikita Irons
April 7, 2016
Page 2 of 2

DHA Response: DHA has ensured that violations cited have been corrected and has taken the appropriate action(s) for those units with remaining deficiencies. DHA will certify to the correction of all deficiencies cited with the Greensboro Field Office. A summary of results for the quality control re-inspection conducted by the department is listed below:

- 56 Units passed re-Inspection (all violations cited have been corrected);
- 4 Units have been abated (pending termination of the HAP contract);
- 2 Extensions were granted to landlords to complete the deficiencies cited;
- 3 HAP Terminations were completed (for participants who have since relocated to new units); and
- 4 HAP Terminations were completed (for participants who moved out of their unit without proper notice to the PHA)

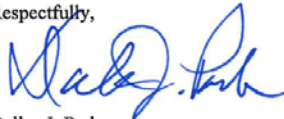
OIG Recommendation 1C: Implement adequate procedures and controls to ensure that all program units meet HUD's and Authority's own housing quality standards to prevent \$7,560,158 in program funds from being spend on units that do not comply with requirements over the next year. The procedures should include but not be limited to ensuring that inspectors are properly trained and familiar with HUD's and the Authority's requirements to ensure that they conduct complete and accurate inspections.

DHA Response: Additional training for staff responsible for conducting HQS inspections and all supervisory staff is scheduled during the month of May 2016. The agency is in the process of procuring a training program, using the mechanics of professional home inspectors. DHA will implement a series of landlord workshops to better educate participating landlords on HQS requirements and compliance standards. DHA will share that information with the Greensboro Field Office in its corrective action plan. After conclusion of the planned training activities, DHA will update its inspection protocols, policies, and procedures.

DHA is acting upon the recommendations provided by your agency and making additional changes to its' operating procedures to ensure compliance.

Should you have any questions or need further data, please contact Rhega M. Taylor, HCV Director, at rtaylor@dha-nc.org.

Respectfully,



Dallas J. Parks
Chief Executive Officer

Comment 1

OIG Evaluation of Auditee Comments

Comment 1 The Authority did not concur with our assessment that the lack of adequate training resulted in inspectors failing to perform accurate and complete inspections. The Authority stated each inspector had extensive working knowledge of the City of Durham (City) housing code. However, as stated in the finding, although the Authority's inspection staff received some housing quality standards inspection training, none of the staff members received formal training on the City's local housing code. In addition, the Authority did not provide any documentation to support that its inspectors had extensive working knowledge of the City's housing code. Nonetheless, the Authority concurred with the audit finding and all recommendations. Specifically, the Authority stated that it has already begun to implement specific audit recommendations to improve its housing quality standards inspections process. We commend the Authority for its proposed actions to address the recommendations. The Authority should work with HUD to ensure violations were corrected and properly certified and that its procedures and controls are fully implemented.

Appendix C

Schedule of OIG Housing Quality Standards Inspection Results

Identification number	Materially failed unit	Failed unit	Passed unit	Total violations for materially failed units ⁶	Total number of housing quality standards violations ⁶	Total number of preexisting violations ⁶
1		X			6	4
2	X			7	7	7
3		X			6	4
4		X			3	2
5			X		0	0
6			X		0	0
7		X			3	1
8	X			8	8	6
9	X			8	8	5
10	X			24	24	23
11	X			12	12	11
12			X		0	0
13			X		0	0
14		X			1	1
15	X			2	2	2
16	X			9	9	4
17	X			25	25	20
18		X			1	0
19		X			7	2
20		X			2	0
21		X			4	4
22	X			3	3	3
23		X			3	0
24		X			5	1
25		X			5	5
26	X			8	8	6
27		X			2	1

⁶ The total violations for materially failed units, the total number of housing quality standards violations, and the total number of preexisting violations include violations according to HUD's housing quality standards and the Authority's own requirements.

Identification number	Materially failed unit	Failed unit	Passed unit	Total violations for materially failed units ⁶	Total number of housing quality standards violations ⁶	Total number of preexisting violations ⁶
28		X			5	0
29	X			8	8	7
30	X			23	23	18
31	X			23	23	17
32	X			8	8	7
33	X			7	7	6
34		X			4	3
35		X			6	3
36	X			6	6	4
37	X			11	11	7
38	X			20	20	12
39	X			7	7	6
40	X			10	10	5
41	X			10	10	9
42	X			28	28	21
43	X			24	24	19
44			X		0	0
45	X			6	6	6
46		X			7	4
47	X			15	15	10
48		X			5	2
49	X			12	12	9
50	X			4	4	3
51		X			3	0
52	X			8	8	6
53	X			9	9	3
54		X			1	0
55		X			1	1
56		X			5	4
57	X			29	29	15
58		X			3	1
59	X			15	15	3
60	X			4	4	3
61	X			15	15	9
62	X			6	6	6
63		X			9	0
64		X			5	2
65		X			3	1

Identification number	Materially failed unit	Failed unit	Passed unit	Total violations for materially failed units ⁶	Total number of housing quality standards violations ⁶	Total number of preexisting violations ⁶
66	X			9	9	8
67	X			9	9	5
68		X			13	3
69			X		0	0
70	X			14	14	8
71		X			3	3
72		X			2	2
73	X			19	19	14
74	X			15	15	14
75	X			13	13	7
Total	40	29	6	493	616	408