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DOI REPORT FINDS NYCHA AND ITS CONTRACTOR FAILED TO PROVIDE REQUIRED OVERSIGHT OF SECURITY/FIRE GUARDS ENDANGERING RESIDENTS IN NYC PUBLIC HOUSING

Jocelyn E. Strauber, Commissioner of the New York City Department of Investigation (“DOI”), issued a Report today on an investigation into the oversight of security guards at New York City Housing Authority (“NYCHA”) Senior Buildings, which are dedicated to housing residents aged 62 years and older, and compliance with fire guard requirements at Senior Buildings and other NYCHA developments. DOI’s investigation determined that NYCHA and the contracted security firm FJC Security, doing business as Allied Universal Security Services (“Allied Universal” or “Allied”), failed to consistently provide required and sufficient oversight, endangering vulnerable residents and violating contractual obligations. A copy of the Report follows this release and can also be found at this link: <https://www.nyc.gov/site/doi/newsroom/public-reports.page>

DOI Commissioner Jocelyn E. Strauber said, “DOI’s investigation identified numerous failures in the security and fire guard services that NYCHA’s vendor, Allied Universal Security Services, provided at NYCHA developments. These failures jeopardized the safety of NYCHA residents, including at NYCHA buildings dedicated to seniors. Allied and NYCHA allowed these failures to persist through lack of adequate oversight. DOI has made twelve recommendations to NYCHA which will improve its management and supervision of these contracted guards and NYCHA has agreed to implement the majority of those recommendations.”

DOI’s investigation was prompted by March 2022 media reports on security lapses at NYCHA’s Corsi Houses in East Harlem, N.Y., which showed that the front door of the building did not lock, allowing trespassers to enter. DOI began an investigation to assess the functionality of the lobby doors at Corsi Houses and to evaluate the quality of service provided by the security guards who were employed by Allied Universal. In DOI’s first inspection, investigators observed the scheduled security guard was absent and a non-resident trespasser was inside the lobby. These discoveries prompted DOI to conduct a broader investigation of the security guards and infrastructure at NYCHA’s Senior Buildings from May 2022 through April 2023.

The investigation, which included 39 in-person inspections of Senior Buildings and a review of CCTV footage of 55 security guard shifts, determined that the security guards performing work for NYCHA frequently abandoned their posts or failed to show up for work, and falsified their handwritten timesheets to indicate that they had worked their entire shift, jeopardizing the safety of NYCHA residents and causing NYCHA to be billed for services that were not in fact provided. DOI concluded its investigation of the security guards in April 2023 and shared the results with NYCHA in June 2023. While NYCHA sought to ensure that guards were present thereafter, and to enforce other aspects of its contract with Allied, guards continued to be absent from their posts.

DOI’s findings regarding security guards included:

- Based on DOI’s surveillance of randomly selected senior buildings:
 - 64 of the 94 scheduled security guards (approximately 68%) were absent for all or part of their required shift;

more

- 54 guards abandoned their post for an average of approximately 2 hours; five were no-shows for their entire 8-hour shift; five committed other infractions, such as remaining in an unauthorized location away from their required posts, sleeping, or consuming alcohol during shifts.
- Some of the absent guards falsified their handwritten timesheets to incorrectly indicate they worked a full shift.
- During the in-person inspections, DOI found approximately nine of 28 lobby doors (approximately 32%) were not secure. DOI also found 44 of the 63 Senior Buildings (approximately 70%) had CCTV cameras that were inoperable or unable to be viewed remotely.

In the spring and summer of 2023, DOI also investigated the fire guard services provided by Allied Universal at NYCHA's 24/7 fire watch locations ("Fire Watch Sites"), buildings where the fire safety features are deficient and cannot be corrected within four hours. In those circumstances, the N.Y.C. Fire Code requires that one fire guard per 50,000 square feet of space be present in the building at all times, until the deficient feature is corrected.

DOI's investigation found:

- Based on inspections of 60 Fire Watch Sites from June 9, 2023, to July 10, 2023, only 23 of 60 scheduled fire guards (approximately 38%) were present at their assigned posts for the duration of the inspection (lasting one to two hours), violating the terms of Allied Universal's contract and jeopardizing residents' safety in the event of a fire. DOI began to share its findings with NYCHA in June 2023, while its investigation was continuing. The fire guards, however, continued to abandon their posts thereafter, as NYCHA documented in letters to Allied Universal seeking to enforce contract compliance.
- Certain fire guards falsified their handwritten timesheets to indicate that they completed their scheduled shifts when they had not.
- Scheduled fire guards were absent during three fires that occurred in three different buildings -- in the Douglass Houses, Taft Houses, and Ingersoll Houses developments -- two of which resulted in minor injuries. The fire guards had falsified their handwritten timesheets claiming to be present for the entirety of their scheduled shifts when in fact they were not.
- From October 2019 to February 2024, the term of the contract, NYCHA and Allied Universal failed to consistently exercise required oversight of the security and fire guards that could have prevented or mitigated the guards' absences and other noncompliance. Both the contract and NYCHA's Standard Operating Procedure manual required NYCHA to actively oversee security and fire guards. DOI determined that NYCHA's Office of Safety and Security ("OSS"), which is primarily responsible for this oversight, failed, among other things, to consistently conduct field inspections of the security and fire guards, and to document the inspections that it did conduct, for multiple consecutive years of the contract term.

DOI concluded that Allied Universal failed to provide services for which it billed NYCHA, and that both NYCHA and Allied Universal failed to conduct proper oversight of the guards, and thus did not identify and promptly address the guards' absences and other noncompliance, jeopardizing the safety of vulnerable NYCHA residents. Because NYCHA has committed to provide security guards at these locations and continues to be legally required to provide fire guards where necessary, NYCHA must improve its oversight of these guards to ensure that they perform their duties as required.

DOI issued 12 recommendations to address the vulnerabilities noted in this Report. NYCHA accepted eight recommendations and accepted four recommendations in part, including:

- NYCHA contracts for security and fire guard services should include a requirement that a vendor provide a smartphone application for the guards that incorporates geofencing technology and electronic timekeeping. The geofencing and electronic timekeeping application should record and send an alert to the vendor's managerial staff when guards leave the boundary of their assigned post during their shift.

- NYCHA contracts for security and fire guard services should include a definition of "post abandonment" that specifies the minimum number of minutes that constitutes post abandonment, i.e. an absence exceeding 15 minutes.

➤ NYCHA should provide security guards with a designated security desk or podium on the main floor or lobby of the building that bears NYCHA's insignia and will serve as a central location for the guards. Similarly, NYCHA should require property management to post signage in the lobby that includes the contact information for NYCHA's OSS for emergencies and for inquiries or complaints about security and/or fire guards.

➤ NYCHA should require that OSS conduct a minimum number of unannounced inspections each month to assess security and fire guard performance, and that those inspections be documented.

➤ NYCHA should revise the *Security Guard Service Field Inspection Report* to require that inspections include the lobby and stairwell doors to confirm whether the doors are secure and the self-closing hardware functions properly; and to specify that OSS must immediately report to the development's property management any deficiencies related to security infrastructure identified during an inspection. NYCHA should also revise the *Security Guard Service Field Inspection Report* to require a more efficient, electronic method of delivery, such as scanning and uploading the completed form.

➤ NYCHA should establish a process for receipt and verification of invoices, certified payroll, electronic timekeeping, and geofencing records and should ensure that the documents accurately reflect the hours worked before issuing payment.

➤ NYCHA should require the vendor to provide bi-weekly invoices, so that NYCHA may cross-reference the invoices with CCTV footage when NYCHA deems necessary, and NYCHA should retain the relevant CCTV footage until they have reviewed and approved the invoice.

DOI Commissioner Strauber thanked NYCHA Chief Executive Officer Lisa Bova-Hiatt and her staff for their cooperation on this investigation.

At DOI, the investigation was conducted by Confidential Investigator Wenny Hon, Chief Investigator Ivonne Alvarado-DeJesus, and Assistant Counsel Lauren Kropiewnicki of DOI's Office of the Inspector General for NYCHA; and supervised by Assistant Inspectors General William O'Brien and Nancy Roa, Deputy Inspector General Osa Omoigui, Inspector General Ralph Iannuzzi, Deputy Commissioner of Strategic Initiatives Christopher Ryan, and Deputy Commissioner/Chief of Investigations Dominick Zarrella.

DOI is one of the oldest law-enforcement agencies in the country and New York City's corruption watchdog. Investigations may involve any agency, officer, elected official or employee of the City, as well as those who do business with or receive benefits from the City. DOI's strategy attacks corruption comprehensively through systemic investigations that lead to high-impact arrests, preventive internal controls and operational reforms that improve the way the City runs.

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New York City
Department of Investigation



Safeguarding NYCHA Residents: A Review of Select Safety Measures at Senior Buildings & Compliance with Fire Guard Requirements

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March 2025

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I. EXECUTIVE SUMMARY

The New York City Housing Authority (“NYCHA” or “the Authority”) is home to 1 in 17 New Yorkers and provides affordable housing to more than 500,000 residents.¹ Residents of NYCHA housing, and City officials, have had longstanding concerns about the state of basic safety features including building entry doors, as well as the oversight of security and fire guards.^{2,3,4,5}

In March 2022, media reports stated that the front door at NYCHA’s Corsi Houses, a single building dedicated to residents aged 62 and older, did not lock, and as a result, trespassers entered the building⁶—prompting an investigation by the

¹ *About NYCHA*, N.Y.C. HOUSING AUTHORITY, <https://www.nyc.gov/site/nycha/about/about-nycha.page> (last visited March 24, 2025) (NYCHA has 177,569 apartments in 2,411 buildings across 335 conventional public housing and PACT developments, housing 360,970 residents. The remaining 139,000 residents are Section 8 tenants. Section 8 tenants are not permitted to reside in the conventional public housing discussed in this report).

² See *Oversight - Doors, Locks and Lights: The Infrastructure of Resident Safety at NYCHA: Transcript of Joint Hearing Before the Comms. on Public Housing and Aging*, 2022-2023 Sess., pg. 4–6 (N.Y.C. 2023).

³ See N.Y.C. OFF. OF THE COMPTROLLER, FK23-069S, OBSERVATIONS OF BUILDING DOORS IN NYCHA DEVELOPMENTS (2022) (This 2022 audit conducted by New York City Comptroller Brad Lander found that 36.8% of building entrance doors at 262 NYCHA developments were propped open or unlocked and 40.1% of entrance door locks were broken. Additionally, between the N.Y.C. Comptroller’s 2018 and 2022 audits, the number of entrance doors that were propped open and/or had broken locks increased from 23.5% in 2018 to 57.9% in 2022).

⁴ See Former Federal Monitor Bart M. Schwartz, *Monitor’s Final Quarterly Report for the New York City Housing Authority*, pg. 18, 60 (Feb. 27, 2024) <https://www.documentcloud.org/documents/24487647-nychamonitorletterfinal-report-3-19-2024> (last visited March 24, 2025) (The former Federal Monitor for NYCHA, Bart M. Schwartz, reviewed Allied Universal’s performance as NYCHA’s contracted security and fire guard personnel. The former Federal Monitor for NYCHA found that guards often did not show up for work and many were not present at their posts inside the buildings. Supervisors from the vendors failed to supervise and allowed the guards to sign in and out regardless of whether they were present. The Federal Monitor also reported that resident leaders and other residents at various buildings complained that security and fire guard personnel generally provided little meaningful security and often did not perform their duties).

⁵ See N.Y.C. Department of Investigation, Office of the Inspector General for NYCHA, *Fire Safety and Prevention in Public Housing* (Mar. 30, 2023), <https://www.nyc.gov/assets/doi/reports/pdf/2023/12NYCHAFiresafety.Rpt.Release03.30.2023.pdf> (This DOI report examined fires in three NYCHA developments. DOI found that, among other issues, there were deficiencies in a range of fire safety protocols at the three NYCHA developments, including with respect to the repair and maintenance of trash chute hopper doors and other relevant fire safety elements in the developments, as well as the auditing of fire safety and maintenance records).

⁶ Ayana Harry and Sarah Vasile, PIX11, *Trespassers Create Chaos at NYCHA Senior Development* (March 16, 2022), <https://pix11.com/news/local-news/manhattan/trespassers-create-chaos-at-nycha->

New York City Department of Investigation (“DOI”). DOI commenced this investigation to assess the functionality of the lobby doors at the Corsi Houses and to evaluate the quality of service provided by the security guards, who were employed by FJC Security, doing business as Allied Universal Security Services (“Allied Universal” or “Allied”). During its first inspection of the Corsi Houses, on March 29, 2022, DOI observed that the scheduled security guard was absent and a non-resident trespasser was inside the lobby.

These discoveries prompted a broader investigation of the security guards and infrastructure at NYCHA’s Senior Buildings, buildings dedicated to housing senior residents, for the period of May 2022 through April 2023. That investigation, which included 39 in-person inspections and a review of CCTV footage of 55 security guard shifts, determined that the security guards performing work for NYCHA frequently abandoned their posts, failed to show up for work, and falsified their handwritten timesheets to indicate that they had worked their entire shift, jeopardizing the safety of NYCHA residents and causing NYCHA to be billed for services that were not in fact provided. DOI concluded its investigation of the security guards in April 2023 and shared the results with NYCHA in June 2023. The guards continued to be absent from their posts regularly thereafter, as documented by NYCHA in its correspondence with Allied Universal, which sought to ensure guards were present as required by Allied’s contract with NYCHA and to enforce other contract requirements. DOI’s findings included:

Security Guards

- Based on DOI’s surveillance of 94 individual security guard shifts across 27 randomly selected Senior Buildings (approximately 43% of NYCHA’s then-total of 63 Senior Buildings), 64 of the 94 scheduled security guards (approximately 68%) were absent for all or part of their required shift. 54 guards abandoned their post for an average of approximately 2 hours; 5 were no-shows for their entire 8-hour shift; and 5 committed other infractions, such as remaining in an unauthorized location away from their required posts, sleeping, or consuming alcohol during shifts.
- Some of the absent guards falsified their handwritten timesheets to incorrectly indicate they worked a full shift.

[senior-development/](https://ny1.com/nyc/all-boroughs/news/2022/03/16/senior-nycha-residents-say-they-feel-unsafe-in-their-homes); Alyssa Paolicelli, Spectrum News, *Senior NYCHA Residents Say That They Feel Unsafe in Their Homes* (March 16, 2022), <https://ny1.com/nyc/all-boroughs/news/2022/03/16/senior-nycha-residents-say-they-feel-unsafe-in-their-homes>.

Security Infrastructure

- During 28 of the 39 in-person security guard shift inspections, conducted from March to July 7, 2022, DOI found 9 of 28 lobby doors (approximately 32%) were not secure.
- DOI found that 44 of 63 of the Senior Buildings, approximately 70%, had CCTV cameras that were inoperable or unable to be viewed remotely for various reasons.⁷

In the spring and summer of 2023, DOI conducted a separate investigation examining Allied Universal’s fire guard services at NYCHA’s 24/7 fire watch locations (“Fire Watch Sites”), which are buildings where the fire safety features are deficient and cannot be corrected within four hours.⁸ In those circumstances, the N.Y.C. Fire Code requires that one fire guard be present at all times for every 50,000 square feet⁹ at a Fire Watch Site. Once the deficient fire safety feature has been repaired, a building is no longer characterized as a Fire Watch Site.¹⁰ DOI’s investigation found that the fire guards also were often absent from their posts, including during active fire incidents at three developments, and falsified their handwritten timesheets to indicate that they worked their scheduled shifts. In particular, DOI found that:

Fire Guards

- Based on visits to a total of 60 Fire Watch Sites from June 9, 2023, to July 10, 2023, lasting an average of 1 to 2 hours each, only 23 of 60 scheduled fire guards, or approximately 38%, were present at their assigned posts for the duration of the inspection, in violation of the terms of Allied Universal’s contract and jeopardizing residents’ safety in the event of a fire. DOI began to share its findings with NYCHA in June 2023, while its investigation was continuing. The fire guards continued to abandon their posts thereafter, however, as NYCHA documented in letters to Allied Universal.
- Certain fire guards falsified sign-out times on their handwritten timesheets to indicate that they completed their scheduled shifts when they had not.

⁷ 11 of the 44 CCTV cameras were inaccessible to NYCHA and DOI due to being non-Genetec cameras (i.e., Bosch 700-9, DM: 2). 12 had connection errors, 14 had no CCTV Cameras listed for the address, 2 were stand-alone, 1 had damaged fiber optics, 1 had no listing, 1 had not yet been turned over to NYCHA, 1 had no cameras managed by the development, and 1 is a PACT/RAD-development-managed camera, meaning that NYCHA does not have direct access to the camera as it is managed exclusively by a private management company.

⁸ N.Y.C. Fire Code § 901.7.2.2.

⁹ *Id.*, at § 901.7.2.3.

¹⁰ While NYCHA updates its internal Fire Watch Site list on a weekly basis, NYCHA does not wait until publishing its weekly list to schedule a fire guard for a particular location, if necessary.

- Scheduled fire guards were absent during three fires that occurred in buildings at the Douglass Houses, Taft Houses, and Ingersoll Houses developments, two of which resulted in minor injuries. The fire guards had falsified departure times on their handwritten timesheets.

DOI also found that both NYCHA and Allied Universal failed to consistently exercise required oversight of the security and fire guards that could have prevented or mitigated the guards' absences and other noncompliance from October 2019 to February 2024, the term of the contract. Both the contract and NYCHA's Standard Operating Procedure manual (the "Manual")¹¹ required NYCHA to actively oversee its security and fire guards. NYCHA's Office of Safety and Security ("OSS")¹² is primarily responsible for this oversight, which includes scheduling shifts for the guards, conducting inspections to ensure the guards are in place and working as scheduled, and documenting non-compliance.¹³

OSS failed to fulfill this responsibility, because it failed to document that it had conducted even basic oversight, such as field inspections, for multiple consecutive years of the contract term. Senior OSS officials and other NYCHA officials with authority over OSS also failed to adequately supervise OSS and to identify or respond to these failures. While OSS eventually began to conduct field inspections and document guards' non-compliance starting in 2022, the lack of documentation in earlier years prevented the Authority from becoming aware of the severity of the issue earlier in the contract; moreover, as NYCHA did not have a suitable alternative vendor, NYCHA was unable to terminate the contract more promptly.

NYCHA also failed to adequately oversee Allied Universal's completion of Allied's own contractually required oversight duties, including the requirement that supervisory staff conduct regular field inspections of guard shifts. NYCHA obtained documentation from Allied Universal demonstrating its rate of completion of scheduled inspections for only the first 18 months of the contract term, evidently failing to acquire any inspection records from Allied Universal for the remaining term of the contract. Even for the period of documented inspections, Allied Universal's rate of completion of scheduled inspections was inconsistent, with over 4,000 missed inspections noted during the 18-month period.

DOI therefore concluded that the guards failed to provide the services for which NYCHA was billed by Allied, and that both NYCHA and Allied failed to

¹¹ NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST (2017).

¹² OSS has five units: Investigations, Security, CCTV, Administrative, and Resident Watch.

¹³ *Supra*, at note 11.

conduct proper oversight of the guards, and thus did not respond promptly to the guards' absences and other noncompliance.

The contract with Allied Universal expired in February 2024, and NYCHA initially contracted with other companies to provide fire and security guards.¹⁴ The additional security guard services were intended to be temporary as NYCHA, at that time, lacked funding to provide security services beyond July 1, 2024; after that date, NYCHA proposed to rely on the officers of New York City Police Department and Department of Homeless Services to patrol NYCHA developments.¹⁵ However, on July 1, 2024 NYCHA announced that it had received funding for security guards at Senior Buildings and would continue to provide this crucial service for fiscal year 2025.¹⁶ Therefore, because NYCHA has committed to provide security guards at these locations, and continues to be legally required to provide fire guards where necessary, NYCHA must improve its oversight of these guards so that the Authority does not repeat the significant failures that DOI identified with respect to Allied Universal's performance under the 2019 to 2024 contract, which endangered vulnerable NYCHA residents.

As a result of these investigations, DOI has issued 12 recommendations to NYCHA.

II. BACKGROUND

A. Security Guards and Senior Buildings

NYCHA is not required by law or regulation to provide security guards at its developments or offices, but the Authority has chosen to provide them at Senior Buildings and some central offices.¹⁷ NYCHA's Office of Safety and Security ("OSS") oversees the guards and is required to create security guards' work schedules,

¹⁴ NYCHA awarded the contract to Wisdom Protective Services ("Wisdom") in July 2023, ISS Action ("ISS") in October 2023, and Overwatch Services LLC, doing business as City Safe Partners Security ("City Safe"), in January 2024.

¹⁵ See *Executive Budget Hearings – Public Housing: New York City Council Fiscal Year 2025 Executive Budget Hearings: Transcript of Hearing Before the Comm. on Public Housing Jointly with the Comm. on Finance*, 2024-2025 Sess., pg. 23–25 (N.Y.C. 2024) (NYCHA states that it faces a \$35 million-dollar deficit for its 2024 operating budget).

¹⁶ Monica Morales, PIX11, *Funding Restored for NYCHA Unarmed Security Guard Program* (July 1, 2024), <https://pix11.com/news/monica-makes-it-happen/funding-restored-for-nycha-unarmed-security-guard-program/>.

¹⁷ For certain NYCHA central offices, NYCHA does not provide security guards and instead the landlord provides security services to its tenants.

conduct and record regular field inspections, and document instances of non-compliance, as explained further below.¹⁸

NYCHA's contract with Allied Universal specified various terms of the security guards' services, including certain requirements pertaining to post coverage. The contract obligated Allied Universal to provide uninterrupted security guard coverage, and stated that, in the event a guard leaves their post, Allied Universal "must immediately cover that Post with a relief Security Guard not already assigned elsewhere" and in the event that a relief guard does not show up or is late for their scheduled shift, the Security Guard on duty cannot leave his or her Post until properly replaced by another Security Guard.¹⁹ The contract also required security guards to remain in uniform;²⁰ make rounds, if assigned;²¹ and possess both a New York State guard license ("N.Y.S. Security Guard License")²² and an N.Y.C. Certificate of Fitness for Citywide Fire Guard for Impairment ("N.Y.C. Fire Guard Certification").²³ New York State law also imposes certain requirements on unarmed security guards, including 24 hours of initial training and 8 hours of annual training (unless exempt) at schools approved by the New York State Division of Criminal Justice Services,²⁴ registration with the New York State Department of State, and a background investigation.²⁵

Senior Buildings house thousands of NYCHA's senior residents. While no law or regulation requires NYCHA to provide security guards, NYCHA has opted to provide security guards at these developments to monitor the buildings' lobbies and deter, detect, and report crime due to their uniquely vulnerable residents. The total of number of Senior Buildings in NYCHA's portfolio fluctuates: NYCHA had 72

¹⁸ NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST (2017) (While the Manual allocates these duties to the "Security Manager," there are no employees in OSS or elsewhere in NYCHA that are titled "Security Manager," so it is unclear which employee has this role); *see infra* III, C, 1, NYCHA's Oversight Responsibilities.

¹⁹ *Id.*

²⁰ NYCHA-Allied Universal Contract, at § 5.5(d).

²¹ *Id.*, at § 5.5(f).

²² *Id.*, at § 3.6(a)(1); *see also* NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST, at Appendix XV(A)(3) (Security guards must be in possession of a valid N.Y.S. Security Guard License and company photo ID at all times, and will present their IDs for inspection upon demand by any NYCHA employee or resident).

²³ *Id.*, at § 3.6(a)(2) ("Unless NYCHA grants an exception by a prior written authorization, each security guard must...possess a valid N.Y.C. Fire Guard Certification"); *see also* § 3.5(a)(16) ("the duties of security guards at the buildings include, but are not limited to...performing fire guard services as needed").

²⁴ N.Y.S. Gen. Bus. Law §§ 89-G(1)-(2), 89-H(2).

²⁵ *Id.*, at § 89-I.

Senior Buildings at the start of the contract; 63 at the time of the investigations detailed in this report; and 53 as of the release of this report. As of January 2024, NYCHA’s total senior population across all types of developments was 76,477 (24.5% of NYCHA’s total conventional public housing population, which does not include Section 8 residents), while the total senior population of Senior Buildings was 7,999 (10.4% of NYCHA’s total senior population).²⁶

B. Fire Guards and Fire Watch Sites

The New York City Fire Code requires occupied buildings with a sprinkler, standpipe, or fire alarm system that is out of service and cannot be fixed within four hours to have a 24/7 fire watch—i.e., a rotating schedule of fire guards to constantly monitor conditions and respond to incidents.²⁷ NYCHA hires vendors to conduct inspections of its fire systems; vendors are required to report failed inspections to the location supervisor, NYCHA’s Fire Safety Unit (“FSU”), and FDNY. When a fire system fails an inspection, FSU contacts OSS’s Security Manager to request fire guard services. A development that requires fire guard coverage must have one guard for every 50,000 square feet of floor area.²⁸ While NYCHA updates its internal Fire Watch Site list on a weekly basis, NYCHA schedules fire guards immediately upon receiving a report that a fire system has failed an inspection.

The Fire Code imposes numerous requirements on fire guards. Prospective fire guards must pass an examination administered by FDNY (scoring at least 70%) and obtain FDNY certification. The exam covers fire guard responsibilities, fire protection systems, fire extinguishers, and lithium-ion battery safety. During their shifts, fire guards must continuously patrol the area affected by the out-of-service fire protection system and must constantly watch for fires; have at least one approved means for notifying FDNY and the FDNY-approved fire safety staff on the premises; immediately report any fire to FDNY and emergency preparedness staff on the premises; and maintain a record of the fire watch during such fire watch and for a minimum of 48 hours after the end of the fire watch shift.²⁹ Fire guards must also have access to a portable fire extinguisher, and be trained to use the fire extinguisher, as they are responsible for extinguishing fires that are limited in size and spread.³⁰ Fire guards are prohibited from having additional responsibilities; for example, a fire

²⁶ Performance Tracking and Analytics Department, *NYCHA Resident Data Book 2024*, N.Y.C. HOUSING AUTHORITY (January 2024).

²⁷ N.Y.C. Fire Code § 901.7.

²⁸ *Id.*, at § 901.7.2.3.

²⁹ *Id.*, at § 901.7.2.1.

³⁰ *Id.*

guard could not also serve as a security guard during their fire guard shift.³¹ NYCHA OSS also is responsible for oversight of the fire guards.^{32,33}

C. Oversight Requirements

As part of its duty to oversee security and fire guards as outlined in the NYCHA Standard Procedure Manual (the “Manual”),³⁴ OSS’s Security Manager³⁵ is required to conduct “regular” after-hours field inspections of all general and emergency security and fire guards at NYCHA locations, with the purpose of “ensur[ing] proper guard performance and contract compliance and confirm general security conditions.”³⁶ When conducting the inspections, the Security Manager must complete the *Security Guard Service Field Inspection Report* form,³⁷ and fax the completed form to OSS; the form must be retained for seven years.³⁸ The form calls for information about the time, date, and location of the inspection, as well as information about the guard’s performance and post conditions, including whether the guard is present at their assigned post; attentive to their duties; in their uniform; in possession of their current N.Y.S. Security Guard License, company photo ID, and a copy of their Post Orders; whether the visitor sheet and handwritten timesheets are properly filled out; and whether a desk, podium, chair and radio/other telecommunications device are available at the post. OSS’s Security Manager is also required to set guards’ schedules.

The NYCHA Manual assigns these oversight responsibilities to the “Security Manager,” but there are no employees in OSS or elsewhere in NYCHA with the official title of “Security Manager,” so it is unclear which employee was initially intended to carry out this role. From the initiation of the contract in 2019 until September 2022, the responsibility for oversight of the security companies was held by a former Deputy Director of OSS, Curtis Cabell; then, from September 2022 to August 2023, a former Director, Latonya Smith, handled this responsibility; and, subsequently, from August 2023 to February 2024, the Assistant Director, Constance Robotham, assumed this role.

³¹ *Id.*

³² NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST (2017).

³³ *Id.* (While the Manual allocates these duties to the “Security Manager,” there are no employees in OSS or elsewhere in NYCHA that are titled “Security Manager,” so it is unclear which employee has this role); *see infra* III, C, 1, NYCHA’s Oversight Responsibilities.

³⁴ *Id.*

³⁵ *Id.*

³⁶ *Id.*

³⁷ *See Exhibit, NYCHA Security Guard Service Field Inspection Report Form.*

³⁸ NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST (2017).

The contract further provided that if NYCHA identified an infraction of the contract's requirements and intended to request liquidated damages from Allied Universal, NYCHA must provide written notification to the vendor within four business days of the infraction, including the time, location, and description of the infraction ("liquidated damages memoranda").³⁹ After the vendor sent an invoice for services provided, the Security Manager was required by the Manual to reconcile all invoice amounts, less any deduction from payment to Allied Universal based on the guards' non-compliance and NYCHA's right to liquidated damages for guards' missed hours or other violations of the contract. Liquidated damages were authorized for certain infractions, among others, as follows:

- failure to appear (\$100),⁴⁰
- being out of uniform (\$100),⁴¹
- abandoning post (\$300),⁴²
- missed shift inspection (\$65),⁴³
- failure to notify when leaving post (\$25),⁴⁴ and
- failure to make assigned rounds (\$50).⁴⁵

OSS is supervised by a Director, with the support of a Deputy Director and Assistant Director. NYCHA's Office of the Vice President for Public Safety oversees OSS. NYCHA's Vice President for Public Safety—a role held by Gerald Nelson from October 2019 to July 2021 (as relevant to this report) and by James Secreto from October 2021 to the present—was required to report to executives of NYCHA's Office of the Chief Operating Officer (specifically, the General Manager/Chief Operating Officer, Vito Mustaciuolo, from October 2019 to February 2022; the Interim Chief Operating Officer, Daniel Sherrod, from February 2022 to July 2022; and the Deputy Chief Operating Officer, Marvin Walton, from July 2022 to May 2023). Since May 2023, Vice President for Public Safety James Secreto has reported to the newly created Office of the Senior Vice President of Quality Assurance, Safety, and Technical Programs, Lauren Gray.

³⁹ NYCHA-Allied Universal Contract, §5.5(a).

⁴⁰ *Id.*, at § 5.5(c).

⁴¹ *Id.*, at § 5.5(d).

⁴² *Id.*, at § 5.5(b).

⁴³ *Id.*, at § 5.5(e).

⁴⁴ *Id.*, at § 5.5(g)(8).

⁴⁵ *Id.*, at § 5.5(f).

D. NYCHA's Contract with FJC Security d/b/a Allied Universal

FJC Security has been a vendor for NYCHA's security and fire guard services since 2000 and 2006, respectively. In October 2016, Allied Universal purchased FJC Security. As of mid-2023, Allied Universal was North America's largest security firm, the third largest private employer in North America, and the seventh largest private employer world-wide.⁴⁶ NYCHA contracted with Allied Universal for both security and fire guard services in late 2019. At the commencement of the contract, Allied Universal agreed to supply security guard services at 72 Senior Buildings⁴⁷ and 5 central offices and fire guard services on an as-needed basis. The original contract for \$75,348,000, effective October 1, 2019, provided for a three-year term with two one-year renewal options. Of the total amount, \$26,208,000 was allocated to Senior Building security and \$49,140,000 to fire guard services. NYCHA renewed the contract twice, extending it to February 2024 and increasing the total amount to \$155,060,020. For the 2019 through 2024 contract with Allied Universal, NYCHA has paid Allied Universal \$142,060,405.70.

III. INVESTIGATIVE FINDINGS

During the security and fire guard investigations, DOI discovered a pattern of non-compliance by Allied Universal and failures of oversight by NYCHA officials, including NYCHA's OSS and the NYCHA officials who oversaw the office during the 2019-2022 period referenced in this investigation. The findings of these investigations, including the results of in-person surveillance, CCTV footage, invoice review, building inspections, and interviews, are as follows.

A. The Security Guard Investigation

1. Security Personnel

a. *First Round of Surveillance*

In March 2022, media reports stated that individuals were trespassing inside NYCHA's Corsi Houses (a senior-only building) because the lobby door did not lock.⁴⁸ That report prompted DOI to inspect the Corsi Houses' lobby door, confirm the

⁴⁶ Alana Semuels, TIME, *The Problems Inside North America's Largest Security Firm—and Third-Biggest Employer* (May 11, 2023), <https://time.com/6278534/allied-universal-security-problems/>.

⁴⁷ At the time of the investigations detailed in this report, NYCHA had 63 Senior Buildings. At the time of the release of this report, NYCHA has 53.

⁴⁸ Ayana Harry and Sarah Vasile, PIX11, *Trespassers Create Chaos at NYCHA Senior Development* (March 16, 2022), <https://pix11.com/news/local-news/manhattan/trespassers-create-chaos-at-nycha-senior-development/>; Alyssa Paolicelli, Spectrum News NY1, *Senior NYCHA Residents Say That They Feel Unsafe in Their Homes* (March 16, 2022), <https://ny1.com/nyc/all-boroughs/news/2022/03/16/senior-nycha-residents-say-they-feel-unsafe-in-their-homes>.

presence of the scheduled security guard, and assess whether there were any trespassers in the lobby on five dates in 2022 (March 29, May 10, May 19, May 23, and June 7). During the first inspection on March 29, DOI found that the scheduled security guard was absent, a non-resident was trespassing inside the lobby, and there were human feces, urine, and hypodermic needles in the common areas. While the lobby door was secure, the Director of Corsi Houses' senior center informed DOI that the door was previously broken and had been repaired. DOI notified development staff of its findings during the initial inspection, and development management created work orders when necessary. NYCHA then informed DOI that NYCHA fixed the problems that DOI observed, and DOI confirmed the presence of the security guard, absence of trespassers, and the functionality of the lobby door in its four subsequent visits on May 10, May 19, May 23, and June 7.

After visiting the Corsi Houses, DOI initiated a broader investigation of security guard performance at 34 randomly selected Senior Buildings, conducting two rounds of inspections between May 3 and July 7, 2022. During the first round of inspections, conducted from May 3 to June 7, 2022, DOI visited 5 developments to verify if the security logbook was present^{49,50} and visited 19 NYCHA Senior Buildings within those developments to determine if the scheduled guards (one guard assigned to each building per shift) (1) were present, (2) possessed their N.Y.S. Security Guard License⁵¹ and N.Y.C. Fire Guard Certification,⁵² and (3) were in uniform.⁵³ DOI found that 5 of 5 developments, 100%, had the security logbook. However, during DOI's on-

⁴⁹ NYCHA-Allied Universal Contract, at § 3.5(a)11 (requiring that the security guards keep an accurate account through logbook entries of all activity at the Building); *see also* NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST, at Appendix XV(A)(10) (mandating that security guards maintain a log of all activity while on post).

⁵⁰ DOI observed during these visits that the security logbook was present at 14 of the 19 developments, but did not assess whether the entries in the logbook were accurate or identify who made the entries.

⁵¹ NYCHA-Allied Universal Contract, at § 3.6(a)(1) (Unless NYCHA grants an exception by a prior written authorization, each security guard must be licensed as a security guard by the State of New York"); *see also* NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST, at Appendix XV(A)(3) (Security guards must be in possession of a valid N.Y.S. Security Guard License and company photo ID at all times, and will present their IDs for inspection upon demand by any NYCHA employee or resident).

⁵² NYCHA-Allied Universal Contract, at 3.6(a)(2) ("Unless NYCHA grants an exception by a prior written authorization, each security guard must...possess a valid N.Y.C. Fire Guard Certification"); *see also* 3.5(a)(16) ("the duties of security guards at the buildings include, but are not limited to...performing fire guard services as needed").

⁵³ *Id.*, at § 3.5(a)(2) (requiring that the security guard report to their assigned Building on time and in complete uniform); *see also* § 3.9(a) ("the Consultant must provide the security guards with uniforms consisting of slacks, a blazer [which may include the Consultant's insignia or logo], a dress shirt, a tie, and as the weather dictates, a coat and hat [which may include the Consultant's insignia or logo] [the 'Uniforms']...NYCHA requires the security guards to wear the Uniforms while performing the Services at the Buildings").

site visit, which lasted for approximately one to two hours, DOI found that only 5 of 19 security guards, or approximately 26%, were present. Of the 5 security guards who were present, all 5 possessed a N.Y.S. Security Guard License, 4 had a N.Y.C. Fire Guard Certification, and 4 were in uniform.

After NYCHA's OSS provided DOI with a list of security guards' scheduled hours, DOI conducted follow-up visits from June 28 to July 7, 2022, at 15 of these Senior Buildings to verify if Allied Universal security personnel (1) were present, (2) possessed a N.Y.S. Security Guard License and a N.Y.C. Fire Guard Certification, and (3) were in uniform. During DOI's on-site visit, which lasted approximately one to two hours, DOI found that only 9 of 15 security guards, approximately 60%, were present. Of the 9 security guards who were present, all 9 possessed a N.Y.S. Security Guard License and 8 were in uniform, but only 4 of 9,⁵⁴ approximately 44%, possessed a N.Y.C. Fire Guard Certification.

Based on these findings, DOI determined that reviewing NYCHA Senior Buildings' Genetec CCTV footage would be necessary to verify whether there was an Allied Universal security guard constantly stationed at each Senior Building for their full shift as required by the contract. DOI also inspected the accessibility of the Genetec CCTV cameras, discussed below.⁵⁵

b. CCTV Footage and Allied Universal Invoice Review

DOI reviewed 19 Senior Buildings' CCTV footage⁵⁶ over a 2-to-5-day period each, for a total of 55 8-hour shifts from August 5, 2022, to March 6, 2023, to confirm whether security personnel were present throughout their scheduled hours. DOI documented the security guards' arrivals and departures with screenshots, and, as applicable, documented certain contractual infractions—i.e., being out of uniform (\$100),⁵⁷ not showing up to a scheduled shift (\$100),⁵⁸ and abandoning post (which DOI defined as being absent from a post, without informing Allied Universal's Command Center and ensuring the deployment of a replacement guard, for more than 10 minutes) (\$300).⁵⁹

DOI found that 45 of 55 security guards, approximately 82%, worked less than their contracted shifts, totaling 45 infractions, including 40 infractions for abandoning post (for an average duration of approximately two hours) and 5

⁵⁴ DOI did not ask one of the 9 present security guards whether they possessed a N.Y.C. Fire Guard Certification.

⁵⁵ See *infra* III, 2, b, *Genetec CCTV Accessibility Review*.

⁵⁶ See Exhibit, DOI CCTV Senior Buildings Security Guard Footage Review by Development.

⁵⁷ NYCHA-Allied Universal Contract, at § 5.5(d).

⁵⁸ *Id.*, at § 5.5(c).

⁵⁹ *Id.*, at § 5.5(b).

infractions for failure to appear. DOI calculated that these infractions would amount to \$12,750.00 in liquidated damages⁶⁰ for August 5, 2022, to March 6, 2023. Moreover, when DOI attempted to cross-reference the CCTV footage with the submitted Allied Universal invoices and accompanying handwritten timesheets, DOI discovered discrepancies between the actual number of hours that the security guards worked (as captured on the CCTV footage) and the number of hours the guards indicated they had worked on their handwritten timesheets, revealing that guards were falsifying their handwritten timesheets prior to the end of their shift to conceal the fact that they had abandoned their shift.

c. Additional In-Person Surveillance

Based on the CCTV findings, DOI selected three NYCHA consolidations, five buildings in total, that appeared to have reoccurring contract infractions (i.e., Leavitt Houses, UPACA #5 and 6, and Borinquen Plaza I and II Houses) and conducted additional surveillance. At all five buildings, DOI discovered that the scheduled security guards failed to comply with crucial contract requirements. Specifically, DOI observed the following:

- 2 of 5 security guards were found asleep at their posts;
- 1 of 5 security guards arrived to their post approximately 43 minutes late, left their post 17 minutes after arriving (only an hour into their scheduled shift), and purchased and drank alcohol⁶¹ at a nearby corner store before returning to their shift;
- 2 of 5 security guards, while present at their developments, entered and remained in unpermitted locations away from their required posts in the lobby.

These incidents reflect a pattern of non-compliance by Allied Universal's security guards and a failure to provide security to NYCHA's senior buildings pursuant to the terms of the contract.

d. Security Guard Findings—Conclusions

In sum, DOI's in-person inspections and CCTV footage review of 94 individual security guard shifts across 27 randomly selected Senior Buildings revealed that 66 of the 94 scheduled security guards (approximately 68%) were absent for all or part of their required shift or committed other violations of the contract, including 40 that

⁶⁰ This calculation was made by DOI and is independent of the liquidated damages that were calculated or recuperated by NYCHA.

⁶¹ NYCHA-Allied Universal Contract, at § 3.6(b)(1)(b); *see also* NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST, Appendix XV(A)(25) (2017).

abandoned their post, 14 that were absent from their post, 5 that failed to appear for their shift, and 5 that committed other infractions such as remaining in an unauthorized location in the building away from their required posts, sleeping, or consuming alcohol during shifts. DOI also found that guards who abandoned their posts falsified their handwritten timesheets by writing, in advance of the shift's end, that they signed out at the end of their shift, even though DOI observed that they had abandoned their posts prior to the end of their shifts. This indicates that these guards planned ahead to abandon their posts, thereby leaving the lobbies of these Senior Buildings unprotected and in greater danger of trespassing and other crimes, and attempted to conceal their infractions by falsifying handwritten timesheets. DOI completed its investigation of the security guards working at Senior Buildings and shared the findings of the investigation with NYCHA in June 2023, in response to a request from NYCHA's Vice President of Procurement Ethics and Vendor Responsibility for information pertaining to any deficiencies that DOI had observed with respect to the performance of Allied Universal's security guards.

2. Security Infrastructure

a. Trespassing and Lobby Doors

It is NYCHA's responsibility to maintain the security infrastructure within its developments; that infrastructure is critical to ensuring residents' safety. As explained above, after the March 2022 media reports stated that the front door at NYCHA's Corsi Houses (a single Senior Building) did not lock, and as a result, individuals were trespassing and using drugs inside the building,⁶² DOI inspected the Corsi Houses on five dates: March 29, May 10, May 19, May 23, and June 7, 2022. During each of the five visits, DOI found that the lobby door was functional and secure. However, the Corsi Houses Property Manager reported that the lobby door had been broken and was only recently fixed. Notwithstanding the secure lobby door, during its first visit to the Corsi Houses, DOI observed an unauthorized individual inside the lobby, observed human feces, urine, and hypodermic needles in the common areas (i.e., stairwells, roof, and basement), and heard from tenants that they had observed non-resident trespassers in the lobby and stairwells during the evenings. After DOI notified the development staff of these conditions, they were remedied and not present during DOI's four follow up visits to the Corsi Houses.

⁶² Ayana Harry and Sarah Vasile, PIX11, *Trespassers Create Chaos at NYCHA Senior Development* (March 16, 2022), <https://pix11.com/news/local-news/manhattan/trespassers-create-chaos-at-nycha-senior-development/>; Alyssa Paolicelli, Spectrum News NY1, *Senior NYCHA Residents Say That They Feel Unsafe in Their Homes* (March 16, 2022), <https://ny1.com/nyc/all-boroughs/news/2022/03/16/senior-nycha-residents-say-they-feel-unsafe-in-their-homes>.

Subsequently, from May 3 to June 7, 2022, DOI inspected 15 Senior Buildings' lobby doors to assess whether they were operational and to identify any potential trespassers in the lobbies. DOI did not observe any unauthorized persons, but DOI found that only 11 of 15, or approximately 73%, of the lobby doors inspected were secure. DOI conducted additional inspections of lobby doors and looked for potential trespassers from June 28 to July 7, 2022, at 13 Senior Buildings, and did not discover any persons who appeared to be trespassers. DOI also found that only 8 of 13 lobby doors inspected,⁶³ or approximately 61%, were secure. In total, from both inspections, DOI found that 19 of 28 lobby doors inspected, or approximately 68%, were secure, and 32% were not secure. The combination of non-secure lobby doors and frequently absent security guards raises significant security concerns for the elderly residents of these buildings.

b. Genetec CCTV Accessibility Review

Security cameras are critical features of a building's security system; the presence of a camera is a deterrent to criminal activity and cameras can capture evidence of criminal activity that may occur. To verify whether the cameras at Senior Buildings were functioning and accessible, DOI attempted to access the Genetec CCTV cameras at the 63 Senior Buildings. DOI found that 44 of 63 of the Senior Buildings, approximately 70%, had CCTV cameras that could not be viewed remotely for various reasons, including outdated or incompatible software or hardware causing login, connection, and data storage issues; camera models lacking remote viewing capabilities; and damage.⁶⁴ NYCHA retains footage for varying lengths of time, depending on the camera model.

B. The Fire Guard Investigation

On March 30, 2023, DOI commenced the fire guard investigation after receiving an anonymous complaint regarding fires that occurred at two of NYCHA's Senior Buildings in early 2023; DOI also examined a third fire, which occurred in mid-2023 at another Fire Watch Site. In this investigation, DOI reviewed the general performance of Allied Universal's fire guards in both Senior Buildings and NYCHA's other developments.

⁶³ DOI investigators did not check the lobby doors for two buildings.

⁶⁴ 11 of the 44 CCTV cameras were inaccessible due to being non-Genetec cameras (i.e., Bosch 700-9, DM: 2), 12 had connection errors, 14 had no CCTV Cameras listed for the address, 2 were stand-alone, 1 had damaged fiber optics, 1 had no listing, 1 had not yet been turned over to NYCHA, 1 had no cameras managed by the development, and 1 is a PACT/RAD-development-managed camera, meaning NYCHA does not have direct access to the camera as it is managed exclusively by a private management company.

The first incident that prompted the fire guard investigation occurred at 1:15 a.m. in the morning of February 28, 2023, at a building in the Ingersoll Houses development, located at 25 Monument Walk, Brooklyn, N.Y., when a lithium-ion battery exploded while charging. This site was designated as a Fire Watch Site, but a review of CCTV footage showed that there was no fire guard present from 1:00 a.m. to 3:30 a.m. Two persons were transported to the hospital for minor injuries. If the fire guard had been present as required, the fire guard would have been on duty to report the fire to FDNY, document the fire throughout its duration, and, if possible and consistent with their training, extinguish the fire with the available portable fire extinguisher.

Subsequently, on March 15, 2023, at 3:45 p.m., a fire occurred in an apartment kitchen at the Douglass Houses, located at 850 Columbus Avenue, New York, N.Y., in a building that was designated as a Fire Watch Site. A fire guard was scheduled for an 8:00 a.m. to 4:00 p.m. shift that day; however, the fire guard arrived at 8:09 a.m. and departed at 8:14 a.m. The guard was absent for nearly three hours and returned at 11:05 a.m. but could not enter the building (for reasons unknown) and departed again. The guard did not return for the remainder of the shift. CCTV footage also revealed that, as a result of the fire, a resident fled the building with an infant, and the lobby could be seen filled with thick smoke until approximately 20 to 30 minutes later, when FDNY had completed extinguishing the fire and informed residents that they could return to the building. There were no reported injuries. However, as with the above incident, the fire guard's absence increased the risk of harm to residents, as fire guards are trained and required to ensure prompt notification of FDNY, documentation of the fire, and extinguishing of small fires.

After reviewing CCTV footage of the incidents, NYCHA sent Allied Universal a memorandum, dated March 16, 2023, requiring that Allied Universal submit a staffing accountability action plan due to the insufficient fire guard coverage. NYCHA also sent Allied Universal a liquidated damages memorandum, dated March 17, 2023, informing Allied Universal that NYCHA would be entitled to liquidated damages due to Allied Universal's lack of coverage during the time in which the fires occurred. Allied Universal subsequently accepted NYCHA's calculation of the liquidated damages owed, terminated the employees that were scheduled to be on duty at the buildings at that date and time, and submitted a staffing accountability plan.⁶⁵

A third fire (cause unknown) occurred at approximately 2:19 a.m. on May 14, 2023, in an apartment at the Taft Houses, located at 70 East 115th Street, New York, N.Y., in a building listed as a Fire Watch Site. The fire guard who was scheduled for

⁶⁵ See Exhibit, Allied Universal Staffing Accountability Action Plan.

the 4:00 p.m. to 12:00 a.m. shift abandoned their post two hours early, and there was no coverage for the 12:00 a.m. to 8:00 a.m. shift, the period when the fire occurred. Two people were transported to the hospital for minor smoke inhalation. In response, NYCHA sent a liquidated damages memorandum to Allied Universal and sought damages for the absence of the fire guard during the Taft Houses fire, as verified by CCTV footage review, on May 15, 2023.

For all three incidents, NYCHA's failure to have fire guards on site at all times violated the N.Y.C. Fire Code, which mandates the constant presence of fire guards to compensate for the absence of effective fire protection systems (such as sprinklers, standpipes and fire alarms) at Fire Watch Sites. At these sites, the absence of a trained fire watch professional, who is available to swiftly address and extinguish fires, increased the risk to residents that fires would spread and cause damage or injury.

Thereafter, DOI began inspecting other fire guard posts to verify the presence of the guards and compliance with other N.Y.C. Fire Code requirements. Based on a list of active Fire Watch Sites that DOI obtained from NYCHA's OSS in March 2023, and a revised list received in June 2023,⁶⁶ DOI selected a random sample of 32 NYCHA developments located throughout the five boroughs and performed unannounced site visits, lasting approximately one to two hours each, at 60 buildings from June 9 to July 10, 2023, to verify if the fire guard logbooks were present, if guards had recorded the correct sign-in and sign-out times, and if the guards (1) were present, (2) in uniform, and (3) carrying their N.Y.C. Fire Guard Certification and N.Y.S. Security Guard License. In total, DOI checked for the presence of 60 scheduled fire guards (i.e., one per building). DOI found that only 23 of 60 fire guards, or approximately 38%, were present at their assigned locations during DOI's site visits, in proper uniform, and carrying their N.Y.C. Fire Guard Certification and N.Y.S. Security Guard License; the other 37 fire guards (62%) were absent during DOI's approximately one-to-two-hour-long inspections. DOI also found that the absent guards had falsified their handwritten timesheets to indicate that they were present for the period of time in which DOI observed that they were absent. The fire guards' absences are concerning. Not only are the absences in violation of law and the Allied Universal contract with NYCHA, but also, more importantly, the absence of fire guards at buildings where the fire systems have broken or malfunctioned pose safety risks to residents of those buildings.

⁶⁶ NYCHA updates its fire guard coverage list weekly.

C. Findings Regarding NYCHA and Allied Universal's Oversight Responsibilities and NYCHA's Remedial Actions

1. NYCHA's Oversight Responsibilities

NYCHA's contract with Allied Universal, which began in October 2019 and ended in February 2024, and NYCHA's Manual,⁶⁷ required NYCHA and Allied Universal to conduct certain oversight measures to ensure that Allied Universal's security and fire guards complied with the contract. However, during the course of the contract, both Allied Universal and NYCHA failed to consistently implement these required measures for substantial periods of time, allowing the security and fire guards' pattern of frequent infractions to continue unchecked, and thereby endangering residents of both NYCHA's Senior Buildings and Fire Watch Sites.

DOI found that the Security Unit of NYCHA's OSS⁶⁸—the office generally responsible for overseeing safety and security matters for the Authority—failed, for multiple consecutive years, to document that it had conducted required field inspections, recorded and notified Allied Universal of guards' infractions of the contract, calculated liquidated damages using the proper evidence, or requested liquidated damages from Allied Universal in the required format.

With respect to field inspections, the former Director of OSS, Raymond Rodriguez, stated that from October 2019 through August 2021, nearly the first two years of the contract term, OSS conducted approximately 40 to 60 field inspections per month.⁶⁹ However, despite being required to document information about inspections using the required *Security Guard Service Field Inspection Report* form⁷⁰ and retain that form for at least seven years, OSS has failed to provide any documentation to prove that the former Deputy Director and Security Manager, Curtis Cabell, or other OSS staff, in fact conducted any field inspections until September 2021, as reflected in the chart below.⁷¹

While OSS conducted and documented inspections for October and November 2021, OSS failed to document inspections for December 2021. Thereafter, inspections were conducted and recorded on a monthly basis, but, from September 2021 through October 2022, the monthly totals were inconsistent and much lower than the monthly average for the subsequent months through the end of the contract (November 2022

⁶⁷ NEW YORK CITY HOUSING AUTHORITY, INDEX NO. 040:99:6, NYCHA STANDARD PROCEDURE MANUAL: SECURITY GUARD/FIRE GUARD REQUEST (2017).

⁶⁸ OSS has five units: Investigations, Security, CCTV, Administrative, and Resident Watch.

⁶⁹ DOI interviewed Rodriguez on December 6, 2024.

⁷⁰ See Exhibit, NYCHA *Security Guard Service Field Inspection Report* Form.

⁷¹ DOI interviewed Cabell on April 13, 2023, and requested documentation of the inspections on December 18, 2024.

to February 2024). On average, from September 2021 through October 2022, OSS conducted and documented approximately 66 monthly inspections, while from November 2022 to February 2024, OSS conducted and documented approximately 167 monthly inspections. Moreover, even assuming OSS did conduct 40 to 60 inspections per month from October 2019 through August 2021 as stated by the former Director, this monthly average is lower than the average number of inspections conducted monthly for the periods September 2021 through October 2022 and November 2022 through February 2024. It is also notable that the more frequent inspections that began in November 2022 commenced after former Deputy Director Cabell (who had held the Security Manager role since October 2019) was reassigned from Security Manager duties in October 2022 and a former OSS Director, Latonya Smith, assumed the role of Security Manager.

Overall, NYCHA completed 3,567 inspections during the term of the contract (see table below).

OSS Security Guard and Fire Guard Field Inspections for Allied Universal Sites⁷²

	2019	2020	2021	2022	2023	2024
January	N/A	0	0	59	138	109
February	N/A	0	0	31	165	194
March	N/A	0	0	53	188	N/A
April	N/A	0	0	36	141	N/A
May	N/A	0	0	45	221	N/A
June	N/A	0	0	44	162	N/A
July	N/A	0	0	84	192	N/A
August	N/A	0	0	215	181	N/A
September	N/A	0	167	62	174	N/A
October	0	0	22	63	172	N/A
November	0	0	42	156	156	N/A
December	0	0	0	182	152	N/A

⁷² OSS provided DOI with this chart on June 18, 2024.

As stated above, the contract also required NYCHA to notify Allied Universal of infractions—such as absent security or fire guards—and request liquidated damages by sending, within four business days of the infraction,⁷³ a liquidated damages memorandum with the time, location, and description of the infraction. The Authority, however, also failed to comply with this requirement, failing to send any liquidated damages memoranda until October 2022, nearly a year after OSS began documenting field inspections.

From October 2022 to February 2024, when NYCHA calculated liquidated damages, NYCHA cited 3,632 infractions: e.g., failure to appear (\$100),⁷⁴ being out of uniform (\$100),⁷⁵ abandoning post (\$300),⁷⁶ missed shift inspection (\$65),⁷⁷ failure to notify when leaving post (\$25),⁷⁸ and failure to make assigned rounds (\$50).⁷⁹ The most common infraction was no show, which accounted for 3,192 infractions—approximately 88% of all cited infractions. While NYCHA’s failure to conduct and document a sufficient number of inspections from 2019 through late 2022 makes it difficult to determine with certainty Allied Universal’s compliance with the contract during that period, the number of infractions in the following two years strongly suggests that Allied Universal’s pattern of non-compliance began in the 2019 through late 2022 period and was left largely undetected due to NYCHA’s oversight failures.

Based on its inspections, NYCHA also calculated a total of \$556,015 of liquidated damages (see chart below) for October 2022 to February 2024. However, to date, NYCHA has only received \$88,700 in liquidated damages (i.e., from the total for October 2022 to June 2023), approximately 16%, while approximately \$467,000 of liquidated damages remain outstanding. As of October 2024, Allied Universal has agreed to pay these outstanding damages but has not yet done so. In addition to these liquidated damages, and the \$12,750.00 in liquidated damages that DOI calculated for guard infractions for the period from August 5, 2022, to March 6, 2023,⁸⁰ DOI also calculated that NYCHA was entitled to approximately \$290,550 in liquidated damages for documented instances of Allied Universal’s missed field inspections from October 2019 through March 2021.⁸¹ While NYCHA had originally calculated some liquidated damages for these missed inspections by Allied Universal during this time

⁷³ NYCHA-Allied Universal Contract, at § 5.5(a).

⁷⁴ *Id.*, at § 5.5(c).

⁷⁵ *Id.*, at § 5.5(d).

⁷⁶ *Id.*, at § 5.5(b).

⁷⁷ *Id.*, at § 5.5(e).

⁷⁸ *Id.*, at § 5.5(g)(8).

⁷⁹ *Id.*, at § 5.5(f).

⁸⁰ This calculation was made by DOI and is independent of the liquidated damages that were calculated or recuperated by NYCHA.

⁸¹ Cabell provided DOI with these records on December 18, 2024.

period, NYCHA’s calculations had numerous errors and discrepancies, and it is unclear whether NYCHA ever sought payment of the liquidated damages amounts it calculated.

NYCHA’s Liquidated Damages Calculations⁸²

Month	Year	Liquidated Damages
October	2022	\$9,450.00
November	2022	\$9,750.00
December	2022	\$14,550.00
January	2023	\$9,600.00
February	2023	\$11,900.00
March	2023	\$8,700.00
April	2023	\$6,350.00
May	2023	\$10,900.00
June	2023	\$7,500.00
July	2023	\$7,350.00
August	2023	\$6,900.00
September	2023	\$7,200.00
October	2023	\$9,700.00
November	2023	\$10,350.00
December	2023	\$12,850.00
January	2024	\$175,145.00
February	2024	\$237,820.00
Total		\$556,015.00

While NYCHA began consistently conducting inspections and sending liquidated damages memoranda from October 2022 until the last full month of the contract in February 2024, NYCHA often sent the memoranda months after NYCHA

⁸² OSS provided DOI with these calculations on April 16, 2024.

became aware of the infraction—long after the contractually required period (i.e., within 4 days of the infraction). These delayed notifications not only postponed NYCHA’s receipt of compensation to which it was entitled, but also Allied Universal’s ability to take corrective action such as training, disciplining, or terminating the security and fire guards with performance issues.

DOI also found other OSS failures that caused NYCHA to overpay for Allied Universal’s services, including OSS’s failure to consistently implement its required procedure for verifying the accuracy of Allied Universal’s invoices. Before submitting Allied Universal’s invoices to OSS’s Director to approve payment, OSS’s former Deputy Director and Security Manager Cabell, who was responsible for verifying the accuracy of Allied Universal’s invoices until approximately October 2021, did not consistently review invoices for correct service dates, locations, and account information; verify employee hours and pay rate and compare them to Allied Universal’s sign-in sheets and payroll report; and make the appropriate deductions from invoices. These failures continued until December 2023, although an OSS Clerical Associate took over these responsibilities in October 2021, and Assistant Director Robotham and former Director Smith took them over from the Clerical Associate in April 2023.⁸³ As a result, among other issues, NYCHA overpaid Allied Universal by paying for services that had not been performed.

NYCHA also likely undercounted the total liquidated damages owed to the Authority. As explained above, NYCHA first failed to consistently conduct a sufficient number of inspections for the period prior to November 2022, and even after commencing more regular inspections, from October 2022 to December 2023, NYCHA did not use timesheets, certified payrolls, or logbooks to calculate liquidated damages, but instead relied solely on in-person visits to the developments. For that entire period, NYCHA calculated liquidated damages of only \$143,050. In contrast, during the first two months of 2024 (i.e., the final two months of the contract), NYCHA used evidence in addition to site visits to calculate liquidated damages, and for just that short period, calculated \$412,965, indicating that, before these two months, duplicate billings, overbillings, and potentially inaccurate time sheets likely went unnoticed.

OSS’s former Deputy Director and Security Manager Cabell was most directly responsible for ensuring the sufficiency of the security and fire guards’ performance from October 2019 through October 2022, when OSS failed to conduct and document sufficient inspections. Furthermore, this official’s supervisors and other NYCHA

⁸³ NYCHA-Allied Universal Contract, at § 5.6 (“Prior to receiving payment from NYCHA for Services performed, all Invoice and all other documentation requested by NYCHA, and/or submitted by the Consultant, must be found satisfactory to NYCHA in form and substance before NYCHA will issue payment to the Consultant for the Invoice”).

offices with the responsibility to oversee OSS similarly failed to take appropriate steps to ensure OSS complied with its responsibilities, even after becoming aware of the guards' misconduct. Former OSS Director Rodriguez⁸⁴ supervised OSS Deputy Director and Security Manager Cabell from October 2019 until January 2022; former OSS Director Smith took on that supervisory role in August 2022.

Vice President for Public Safety and Security Secreto, tasked with overseeing OSS, became aware of allegations of Allied Universal's failures in approximately November 2021 when he received a complaint from the Chair of NYCHA's Citywide Council of Presidents⁸⁵ alleging that guards were absent from their posts at the Jackson Houses development, a claim confirmed by the Vice President's own observations at a subsequent site visit where only three of eight scheduled security guards were present.⁸⁶ In February 2022, Vice President for Public Safety Secreto sought direction regarding how to manage Allied Universal's contract given their unsatisfactory performance. Secreto was instructed to document the vendor's contract violations per NYCHA contract management practices. However, notwithstanding such instruction, OSS failed to send liquidated damages memoranda to Allied Universal until October 2022 and did not conduct inspections consistently until November 2022. Subsequently, once OSS had begun documenting Allied Universal's noncompliance, OSS and the Procurement Department were able to accelerate the award process for the replacement of Allied Universal. It is also notable that Secreto did not refer the matter to DOI despite its systemic nature.

Despite the guards' widespread pattern of absences, NYCHA ultimately failed to promptly replace Allied Universal with new vendors. Because of OSS's failures to consistently conduct and document field inspections and infractions during the first three years of the contract, and its lack of supervision, it was not until early 2022 that NYCHA became sufficiently aware of the problem to initiate the process of soliciting vendors to replace Allied Universal. Furthermore, NYCHA's decision to contract with Allied Universal for all of the Authority's security and fire guard services, instead of splitting the services among multiple vendors (and, alternatively, its lack of pre-qualified backup vendors to replace Allied Universal in the event of its

⁸⁴ Former Director Rodriguez's last day as OSS Director was January 3, 2022. The Director role remained vacant until former Director Smith assumed the role in August 2022.

⁸⁵ *Citywide Council of Presidents*, N.Y.C. HOUSING AUTHORITY, <https://www.nyc.gov/site/nycha/residents/citywide-council-of-presidents.page> (last visited March 24, 2025) ("At the citywide level, residents are represented by the Citywide Council of Presidents (CCOP). The CCOP is organized by ten districts in the city—Bronx North, Bronx South, Brooklyn East, Brooklyn South, Brooklyn West, Manhattan North, Manhattan South, Queens East, Queens West, and Staten Island. Every president of a recognized resident association is a member of the Citywide Council of Presidents").

⁸⁶ DOI interviewed Secreto on May 11, 2023.

failure to perform) also hindered NYCHA's ability to replace Allied Universal. As NYCHA had contracted only with Allied Universal to handle the entirety of its extensive security and fire guard needs, NYCHA did not have a readily available alternative vendor with an existing contract who might have been able to assume Allied Universal's duties and instead was required to initiate an entirely new procurement process to seek new vendors, which it began nearly at the end of the original contract term. By May 9, 2023, NYCHA prepared and issued an official request for proposals from four qualified vendors,⁸⁷ broken down by borough, and accelerated the awarding process for the upcoming contracts for new guard services. However, due to the length of the procurement process,⁸⁸ NYCHA was unable to finalize the process of awarding the new contracts to vendors to replace Allied Universal before the contract's original end date of November 2022. Therefore, NYCHA ultimately renewed Allied Universal's contract twice, extending the end date to February 2024.

Even after NYCHA had begun the process of procuring new vendors, conducting frequent inspections, and documenting infractions, NYCHA still lacked sufficient documentation of the guards' poor performance. On June 6, 2023, NYCHA's Vice President of Procurement Ethics and Vendor Responsibility, Jessica Heegan, emailed DOI advising DOI that NYCHA may default on its payments to Allied Universal and requesting information from DOI pertaining to Allied Universal's deficiencies. At the time of Heegan's request, DOI's investigation of the fire guards was in its early stages (having commenced in March 2023); DOI had just completed its investigation concerning the security guards. While NYCHA was generally aware that DOI was conducting field visits as part of an investigation into the security guards, DOI had not yet shared its findings with NYCHA; DOI shared its findings, noting that its investigation of the fire guards was ongoing, in response to the June 6, 2023, request.

By approximately the final year of the contract, NYCHA had improved its implementation of certain required oversight measures and reorganized its oversight of OSS and the Office of the Vice President for Public Safety and Security by designating the newly established Senior Vice President of Quality Assurance, Safety, and Technical Programs, Lauren Gray, to oversee these offices in May 2023, as described above. However, NYCHA's oversight failures nevertheless enabled the

⁸⁷ These vendors include Wisdom, ISS, City Safe, and Securitas.

⁸⁸ According to NYCHA, the Authority used the New York State Office of General Services contract system in awarding these contracts, with the purported goal to provide NYCHA's Program Unit with sufficient capacity and time to develop a new operating model and incorporate it into the solicitation for guard services, which may have also increased the overall length of the process of procuring replacements for Allied Universal.

guards' frequent absences which endangered vulnerable residents, led to overbilling of the Authority for guard shifts that were not in fact completed due to post abandonment, and ultimately delayed the process of replacing Allied Universal.

2. Allied Universal's Oversight Responsibilities

Allied Universal also had oversight responsibilities by contract that it failed to implement. Allied Universal was required to establish and maintain a quality control plan, to include, at a minimum, two unscheduled site visits per shift per week by Allied Universal's supervisory level staff to each post (and have sufficient supervisory staff to do so); quarterly management meetings concerning the quality of services provided to NYCHA; and processes to identify and prevent deficiencies in the quality of services in order to maintain an acceptable level of performance.⁸⁹ However, DOI found that from the start of the contract term in October 2019 through March 2021, Allied Universal failed to consistently complete scheduled site visits, completing approximately 8,770 of the 13,240 total scheduled visits (approximately 66%), averaging 248 missed visits per month. The number of completed visits per month also varied widely from 90% of scheduled visits completed per month to 0% of scheduled visits completed. For the month of July 2020, as well as from April 2021 through February 2024, NYCHA did not have information about the number of scheduled or completed supervisory site visits. Despite the fact that guards were frequently absent during this period, and falsified their timesheets, Allied Universal failed to bring any issues concerning the guards to NYCHA's attention.

Thus, it appears that Allied Universal failed to implement its oversight responsibilities with respect to its NYCHA contract, and NYCHA also failed to confirm Allied Universal's compliance. For the period for which NYCHA obtained inspection records from Allied Universal, DOI calculated that NYCHA was contractually entitled to approximately \$290,550 in liquidated damages for documented instances of Allied Universal's missed inspections. OSS had also calculated liquidated damages for Allied Universal's missed inspections during this time period, but OSS's calculations had numerous errors, and it is unclear whether NYCHA ever in fact sought payment of damages for these infractions from Allied Universal. These damages were substantial and Allied Universal's missed inspections likely facilitated guard absence or other misconduct, thereby endangering vulnerable residents.

Other efforts NYCHA implemented to encourage Allied Universal to correct its security and fire guard performance were also largely ineffective. For example, in November 2022, OSS created an internal policy and procedure document and

⁸⁹ NYCHA-Allied Universal Contract, at §§ 3.8(a)(1)-(5).

designated a team, consisting of a Contract Manager, Fire Safety/Tech Services committee, Invoice & Requisitions committee, and Compliance committee, to manage the Allied Universal contract and to improve oversight of the vendor.⁹⁰ While thereafter OSS completed more site inspections, the inspections did not improve guard performance, and as detailed above, OSS invoice review methodology was insufficient to identify either overbilled amounts (and to seek reimbursement) or contract violations entitling NYCHA to seek liquidated damages. Regarding NYCHA's attempts to improve fire guard coverage, NYCHA sent additional memoranda to Allied Universal in March and May of 2023 to highlight concerns about guards' misconduct during the fires that occurred at NYCHA's Ingersoll Houses, Douglass Houses, and Taft Houses, noting that when each fire occurred, there was no fire guard present (as verified by CCTV footage review), despite each location being designated as a Fire Watch Site. In the first of the two memoranda, NYCHA requested that Allied Universal submit an action plan.

Allied Universal submitted a Staffing Accountability Plan⁹¹ with an effective date of March 2023, detailing proposed measures to improve the security and fire guards' performance, including increasing the field supervision head count, adding contingent guard staff, providing training to supervisors, improving communication with guards in the field, and implementing geofencing technology (a virtual fence or perimeter around a physical location that can detect movement inside the virtual boundary) and electronic timekeeping (to remove the need for manual review and documentation of handwritten timesheets) through a smart phone application,⁹² among other measures. However, despite proposing these measures with an effective date of March 2023, Allied Universal never provided evidence to NYCHA that Allied increased field supervisory and contingent guard staff, provided training to supervisors, improved communication with guards in the field, or implemented other measures proposed, and it does not appear that NYCHA ever requested proof that Allied Universal implemented these measures. While Allied Universal did have geofencing and electronic timekeeping capabilities, and generally began meeting more frequently with NYCHA to discuss the guards' performance after NYCHA sent the fire incident memoranda, these measures did not prevent the post abandonment that was documented occurring throughout the last year of the contract, as NYCHA continued to discover frequent instances of no shows and post abandonment and

⁹⁰ Office of Safety and Security, New York City Housing Authority, *Unarmed Uniformed Security Guard Services Policy and Procedure* (2022).

⁹¹ See Exhibit, Allied Universal Staffing Accountability Action Plan.

⁹² A geofence is a virtual fence or perimeter around a physical location. Like a real fence, a geofence creates a separation between that location and the area around it. Unlike a real fence, it can also detect movement inside the virtual boundary.

calculated thousands of dollars of liquidated damages in each of the 11 months following the Plan’s effective date in March 2023.⁹³

3. Oversight Failures—Conclusions

NYCHA contracted with other companies to provide fire guards and security guards beginning in September 2023, after a contract was awarded in July 2023.⁹⁴ NYCHA’s Fiscal Year 2025 Executive Plan did not include funding for unarmed security guards at the Senior Buildings as of July 1, 2024, which would have cost \$6.8 million per year.⁹⁵ Instead, the Authority planned to request that officers of the New York City Police Department patrol developments and Department of Homeless Services conduct outreach. However, on July 1, 2024, the Authority announced that it had received funding for security guards at Senior Buildings and would continue to provide this service.⁹⁶

Although NYCHA is no longer working with Allied Universal, the pattern of non-compliance that DOI identified, coupled with NYCHA’s failure to promptly identify and address that non-compliance, call for NYCHA to implement the following recommendations to improve the quality of the safety and security services that NYCHA receives and prevent future instances of repeated non-compliance.

As a result of these investigations, DOI has issued 12 recommendations to NYCHA.

⁹³ NYCHA has also attempted to highlight Allied Universal’s poor performance by completing five vendor evaluations in PASSPort, N.Y.C.’s procurement database, for Allied Universal’s performance from November 2021 to January 2024, giving Allied Universal a “poor” or “unsatisfactory” rating in the four available categories (i.e., timeliness, fiscal, performance, and overall). NYCHA also sought to have six “cautions” listed on Allied Universal’s PASSPort profile related to the infractions that OSS documented from October 2022 to May 2023 and Allied Universal’s failure to have fire guards present during the three fires discussed above (on the N.Y.C. PASSPort database, the contracting agency is able to issue “cautions” regarding a vendor’s performance). However, NYCHA was informed by the Mayor’s Office of Contract Services that the information that the Authority presented (i.e., inspection records and liquidated damages memoranda) for the cautions was not appropriate for cautions, and instead was tantamount to performance evaluations.

⁹⁴ NYCHA awarded the contract to Wisdom Protective Services in July 2023, ISS Action in October 2023, and Overwatch Services LLC, doing business as City Safe Partners Security, in January 2024.

⁹⁵ See *Executive Budget Hearings – Public Housing: New York City Council Fiscal Year 2025 Executive Budget Hearings: Transcript of Hearing Before the Comm. on Public Housing Jointly with the Comm. on Finance*, 2024-2025 Sess., pg. 23–25 (N.Y.C. 2024) (NYCHA states that it faces a \$35 million-dollar deficit for its 2024 operating budget).

⁹⁶ Monica Morales, PIX11, *Funding Restored for NYCHA Unarmed Security Guard Program* (July 1, 2024), <https://pix11.com/news/monica-makes-it-happen/funding-restored-for-nycha-unarmed-security-guard-program/>; see also Press Release, N.Y.C. Council, N.Y.C. Council Speaker Adams, Finance Chair Brannan, Public Housing Chair Banks, Aging Chair Hudson Celebrate Full Funding Restoration for Security Guard Program at NYCHA Senior Developments (Nov. 15, 2024), <https://council.nyc.gov/press/2024/11/15/2747/>.

D. Recommendations

1. NYCHA's contracts for security and fire guard services should include, or be amended to include where applicable, a requirement that a vendor provide a smartphone application for the guards that incorporates geofencing technology (a virtual fence or perimeter around a physical location that can detect movement inside the virtual boundary) and electronic timekeeping (to remove the need for manual review and documentation of handwritten timesheets). The geofencing and electronic timekeeping application should record and send an alert to the vendor's managerial staff when guards leave the boundary of their assigned post during their shift and should require guards performing assigned rounds to scan QR codes posted along their route. When the application is unavailable, NYCHA should require the guard to call the designated OSS command center or use other specified means of communication to notify management when they leave and return to their assigned posts during their shift. **NYCHA accepts in part. NYCHA states that it will implement this recommendation in future contracts and notes that its current solicitation of prospective vendors for future guard contracts will require vendors to implement technology capable of programming custom guard tours, mobile patrol sequencing, GPS geolocation, and instant notification on checkpoint punches. However, NYCHA states that applying this recommendation to current guard contracts would be infeasible because it would require substantive and material changes to the terms of the contract that would be too costly and time consuming to achieve.**
2. NYCHA's contracts for security and fire guard services should require, or be amended to require where applicable, that the vendor provide the geofencing records to the Authority as backup data for the vendor's invoices, along with the electronic timekeeping records, and that the vendor's own invoicing system be configured so that it prevents release of an invoice to NYCHA for payment if the electronic timekeeping and geofencing records indicate that the guard did not complete the entire scheduled shift listed on the invoice. **NYCHA accepts in part. Regarding configuration of the invoicing system, the Authority explains that—while it will not require the vendor's own invoicing system to be configured so that it prevents release of an invoice to NYCHA for payment if the records are incongruent—the Authority is drafting an addendum to its current solicitation that would require the vendor to cross-reference geofencing data to ensure its invoices to NYCHA only bill NYCHA for services that were in fact provided (unless otherwise approved in advance). The Authority will continue to**

implement this practice in future contracts. Regarding current contracts, NYCHA states that applying this recommendation would be infeasible because it would require substantive and material changes to the terms of the contract that would be too costly and time consuming to achieve.

3. The Authority's contracts for security and fire guard services should include a definition of "post abandonment" that specifies the minimum number of minutes that constitutes post abandonment, such as no more than 15 minutes. **NYCHA accepts in part. NYCHA states that it will define post abandonment in its current solicitation of prospective vendors and in future executed contracts. NYCHA will not apply this recommendation to current guard contracts because it would require substantive and material changes to the terms of the contract that would be too costly and time consuming to achieve.**
4. NYCHA should provide security guards with a designated security desk or podium, on the main floor or lobby of the building, that bears the Authority's insignia and that will serve as a central location for security guards to perform their duties, in order to reduce the risk that guards will spend time away from their posts while on duty. **NYCHA accepts.**
5. NYCHA should require property management to post signage in the lobby that includes the contact information for NYCHA's OSS for emergencies and for inquiries or complaints about the hours or absence of security and/or fire guards. **NYCHA accepts.**
6. The Authority should require that OSS conduct a minimum number of unannounced inspections each month to assess security and fire guard performance, and that those inspections be documented. NYCHA should also require the Office of the Vice President of Public Safety and Security to brief the Office of the Senior Vice President for Quality Assurance, Safety, and Technical Programs on a bi-weekly basis regarding the performance of the security and fire guard vendors. **NYCHA accepts.**
7. The Authority should revise the *Security Guard Service Field Inspection Report* form to require that the OSS employee inspect (1) the lobby and stairwell doors to confirm whether the doors are secure and that the self-closing hardware functions properly and (2) that the security cameras are working, and the cameras' view is not obstructed and/or diminished by lighting issues. NYCHA should also ensure that OSS staff tasked with conducting inspections are sufficiently trained to identify basic issues with door and CCTV camera functionality. **NYCHA accepts.**

8. The Authority should revise the Manual to specify that OSS must immediately report to the development's property management any deficiencies related to security infrastructure (i.e., broken or malfunctioning doors/locks or CCTV cameras) that OSS discovers during an inspection (as described above in recommendation 7) which cannot be immediately corrected by the OSS employee. The Manual should also require that property management, within 12 hours of receiving the deficiency report from OSS, generate a Work Order Ticket. **NYCHA accepts.**
9. NYCHA should revise the *Security Guard Service Field Inspection Report* form to require a more efficient, electronic method of delivery, such as scanning and uploading the completed form or making the form virtual and submittable on the Authority's ServiceNow platform. NYCHA should also revise the Manual to specify this method of delivery. **NYCHA accepts.**
10. NYCHA should revise the Manual to define the role of "Security Manager," including by referencing the office title of the designated employee and their duties, and should specify the titles and duties of the employees responsible for the other roles involved in managing the security and fire guard contracts, including but not limited to those responsible for procurement, financial, and personnel management. **NYCHA accepts.**
11. The Authority should establish a process for receipt and verification of invoices, certified payroll, electronic timekeeping, and geofencing records and should ensure that the documents accurately reflect the hours worked before issuing payment. **NYCHA accepts.**
12. NYCHA should require the vendor to provide bi-weekly invoices, and so that NYCHA may cross-reference the invoices with CCTV footage when the Authority deems necessary (e.g., report of time theft, out-of-boundary alerts via electronic timekeeping, evidence of other contractual violations), the Authority should retain the relevant CCTV footage until they have reviewed and approved the invoice. **NYCHA accepts in part. The Authority will continue to require the vendor to send monthly invoices; however, the technological upgrades required by NYCHA's recently issued solicitation for guard services will require that the vendor provide this information to NYCHA in real time. NYCHA agrees to review this information on a bi-weekly basis and to retain the relevant CCTV footage until OSS has reviewed and approved the invoice.**

IV. CONCLUSION

From October 2019 to February 2024, Allied Universal’s security and fire guards endangered residents of vulnerable Senior Buildings and Fire Watch Sites and violated contractual obligations by frequently abandoning their posts; some guards also attempted to conceal these infractions by falsifying timesheets. Despite the severity of the guards’ non-compliance, NYCHA’s OSS failed to implement crucial measures to oversee Allied Universal for multiple years of the contract term—including failing to document field inspections, notify Allied of guards’ violations, and accurately calculate liquidated damages. Senior OSS officials and other NYCHA offices with authority over OSS also failed to adequately supervise OSS and to detect or respond to these failures for multiple years. Furthermore, NYCHA’s failures to document the guards’ widespread non-compliance, and failure to contract with multiple vendors or have pre-qualified vendors available to assume Allied Universal’s responsibilities, also restricted the Authority’s ability to terminate the contract early. While NYCHA has decided to continue providing security guards at its Senior Buildings and the legally required fire guards at all Fire Watch Sites, NYCHA must not repeat the oversight failures that occurred under the Allied Universal contract and must work diligently to prevent future vendors’ guards from repeating these dangerous violations. DOI’s recommendations are designed to facilitate effective NYCHA oversight of security and fire guard vendors, and ultimately to ensure that NYCHA’s residents are protected from security and fire risks.

V. APPENDIX

DOI CCTV Senior Buildings Security Guard Footage Review by Development

Development	# Of Bldgs.	# Of Viewings	Total Infractions Observed	No-Show \$150	Abandoning Post \$300	Out Of Uniform \$100	Total Liquidated Damages
Borinquen Plaza I	1	3	3	0	3	0	\$900.00
Borinquen Plaza II	1	2	2	2	0	0	\$300.00
Chelsea Addition	1	10	10	0	10	0	\$3,000.00
College Avenue	1	2	2	0	2	0	\$600.00
Conlon Lifhe	1	2	1	0	1	0	\$300.00
Corsi (2 shifts - 4 guards)	1	4	2	0	2	0	\$600.00
Harborview Terrace	1	2	2	0	2	0	\$600.00
LaGuardia	1	2	1	0	1	0	\$300.00
Leavitt	1	2	2	0	2	0	\$600.00
Lower East Side	1	2	1	0	1	0	\$300.00
New Lane	1	5	4	0	4	0	\$1,200.00
Robbins Plaza	1	2	1	0	1	0	\$300.00
Shelton Houses	1	2	0	0	0	0	\$0.00
Surfside Gardens I	1	1	1	0	1	0	\$300.00
Surfside Gardens II-	1	3	3	0	3	0	\$900.00
UPACA #5	1	5	4	0	4	0	\$1,200.00
UPACA #6	1	2	2	0	2	0	\$600.00
White (Washington)	1	2	2	1	1	0	\$450.00
West Brighton	1	2	2	2	0	0	\$300.00
Totals:	19	55	45	5	40	0	\$12,750.00

Allied Universal Staffing Accountability Action Plan



Action Plan

<i>Program/Plan Name</i>	NYCHA – Staffing Accountability Action Plan	<i>Reason for Plan</i>	Corrective Measures to correct Deficiencies- Open Posts, failure to adhere to face-to-face relief protocols and Officer post knowledge through increased Field Supervision and Electronic Technology. Plan to be implemented immediately and adjusted or extended as necessary.
<i>Start Date of Plan</i>	3-22-23	<i>Date Submitted</i>	3.27.23
<i>Committee Chairperson(s)</i>	Donald Davis	<i>Distributed To</i>	Caress Kennedy, Donald Davis, Darin Hamilton, James Secreto, Latonya Smith, NYCHA Field Team and AUS Security Operations Center.
<i>Committee Members</i>	Caress Kennedy, Darin Hamilton, Donald Davis, Andrew Marks	<i>Approved By (if Applicable)</i>	Caress Kennedy, James Secreto & Latonya Smith



ITEM #	ACTIVITY DESCRIPTION	ASSIGNED TO	ACTION	TARGET DATE	STATUS	DATE COMP.
1	Immediate increase in Field Supervision Head Count	Donald Davis	Field Supervisory head count to the NYCHA Field Team effective immediately. 3 additional members will be added to the current staff of 6 bringing to a total of 9 Field Supervisors.	4/7/2023	1 FS identified (transferring as of 3/27/2023) 2 need to be sourced and trained	
2	Relaunch Program / Train supervision on account expectations	Darin Hamilton	Hold townhall and retrain all supervisors & managers on account expectations	3/31/2023		
3	Field Supervision Schedule and Communication	Donald Davis Pedro Gonzalez	Schedule to be completed by BM, Davis and submitted for client and RP review and input. Proposed Geographic outline based on current site count- 1 FI per shift (Brooklyn / Queens) 1 FI per shift Bronx / S.I. 1 FI per shift Manhattan Each inspector to complete 20 inspections per shift	3/27/2023	Don has mapping substantially complete. Pedro to reviewing mapping and ensure EHUB functionality	

Action Plan - Continued

ITEM #	ACTIVITY DESCRIPTION	ASSIGNED TO	ACTION	TARGET DATE	STATUS	DATE COMP.
4	Contingent Staffing / Regression Analysis	Donald Davis Andrew Marks	<p>In order to reduce / eliminate incidents in which Field Supervisors discover missing Officers and are forced to hold post, AUS Management will develop a contingent staff of Officers available for immediate replacement.</p> <p>Immediately source 2/3 Contingent Staffers per geography</p> <p>Conduct Regression Analysis to confirm Contingent Needs</p>	4/17/2023	Req posted for Contingent Staff	
5	Fire Guard Post Abandonment GEO Fenced / Electronic Time Keeping	Pedro Gonzalez Field Team	<p>AUS is working with enhanced software that <u>has the ability to</u> integrate with our current EHUB scheduling software. The software now has the capability of GEO Fencing a Security Officer's cell phone upon electronic clock in and hourly check ins.</p> <p>Software application must be downloaded to each individual Officer's phone and tied in the scheduling Job#.</p>	4/28/2023	Best practice documents received on 3/22. Coordinating with IT to set up background requirements	
6	Explore possibility of additional AUS Supervisory staff to view NYCHA SOC cameras.	Darin Hamilton	Chief Secreto and Director Smith to explore the possibility of adding additional AUS staff to the NYCHA SOC for the purpose of conducting virtual tours of the troops and the facilities.			
7	Weekly / Monthly Reporting	Darin Hamilton Donald Davis	Submit weekly inspection results and action plan updates to clients, Chief Secreto and Director Smith. Report will include results downloaded from EHUB report.	3/31/2023		

NYCHA Security Guard Service Field Inspection Report Form

	NEW YORK CITY HOUSING AUTHORITY Office of Safety & Security	Security Guard Service Field Inspection Report
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Inspection Date _____
Inspection Time "From" _____
Inspection Time "To" _____

Full Development Name _____
Street Address _____
Borough MN BK BX QN SI

Guard's Full Name _____
Guard's NYS Security Unique ID No. _____ **EXP.** _____
Security Guard: Fire Watch
Guard's FDNY Fire Guard ID No. _____ **EXP.** _____

YES	NO	COMMENTS
<input type="checkbox"/>	<input type="checkbox"/>	Guard is on duty at assigned post. _____
<input type="checkbox"/>	<input type="checkbox"/>	Guard is attentive to his duties. _____
<input type="checkbox"/>	<input type="checkbox"/>	Guard is alone / no visitors on post. _____
<input type="checkbox"/>	<input type="checkbox"/>	Guard is in full, proper uniform. _____
<input type="checkbox"/>	<input type="checkbox"/>	Guard has current NYS Security ID. _____
<input type="checkbox"/>	<input type="checkbox"/>	Guard has current company photo ID. _____
<input type="checkbox"/>	<input type="checkbox"/>	Visitor sheet is properly filled out. _____
<input type="checkbox"/>	<input type="checkbox"/>	Logbook is current / properly filled out. _____
<input type="checkbox"/>	<input type="checkbox"/>	Guard has copy of Post Orders _____
<input type="checkbox"/>	<input type="checkbox"/>	Desk/Podium or chair available. _____
<input type="checkbox"/>	<input type="checkbox"/>	Radio/Telephone Comm. Available. _____

Additional Comments / Observations:

Make note of any unusual circumstances, or any condition requiring follow-up, either involving the guard or the post/facility.

_____ Guard Signature	_____ Print Name	_____ Date
_____ Signature	_____ Print Name	_____ Date

FAX completed form to (212) 306-8429