



Rockville Centre Housing Authority

Claims Auditing and Cash Receipts

Report of Examination

Period Covered:

October 1, 2015 – October 31, 2016

2017M-57



Thomas P. DiNapoli

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State of New York Office of the State Comptroller

Division of Local Government and School Accountability

June 2017

Dear Authority Officials:

A top priority of the Office of the State Comptroller is to help authority officials manage their authorities efficiently and effectively and, by so doing, provide accountability for dollars spent to support authority operations. The Comptroller oversees the fiscal affairs of authorities statewide, as well as authorities' compliance with relevant statutes and observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving authority operations and Board governance. Audits also can identify strategies to reduce authority costs and to strengthen controls intended to safeguard authority assets.

Following is a report of our audit of the Rockville Centre Housing Authority, entitled Claims Auditing and Cash Receipts. This audit was conducted pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the New York State Constitution.

This audit's results and recommendations are resources for authority officials to use in effectively managing operations and in meeting the expectations of taxpayers. If you have questions about this report, please feel free to contact the local regional office for your county, as listed at the end of this report.

Respectfully submitted,

*Office of the State Comptroller
Division of Local Government
and School Accountability*



State of New York Office of the State Comptroller

EXECUTIVE SUMMARY

The Rockville Centre Housing Authority (Authority) is located in the Village of Rockville Centre (Village) in Nassau County. The Authority was established pursuant to Section 410 of the Public Housing Law to provide low-rent housing for qualified individuals in accordance with relevant provisions of State Public Housing Law, and the rules and regulations prescribed by the Federal Department of Housing and Urban Development (HUD). The Authority's 2015-16 operating expenditures were \$755,829 funded mainly by rental income from tenants and HUD subsidies. The Authority manages 204 apartment units at two building complexes located in the Village.

The Authority is governed by a six-member Board of Commissioners (Board) composed of five Commissioners appointed by the Village Mayor and one elected by the tenants. The Executive Director (Director) is responsible for the general management and control of Authority financial affairs under the Board Chair's supervision.

Scope and Objective

The objective of our audit was to examine the Authority's claims auditing and cash receipts processes for the period October 1, 2015 through October 31, 2016. Our audit addressed the following related questions:

- Did the Board ensure that claims were properly audited, adequately supported and for legitimate Authority purposes?
- Did Authority officials ensure that cash receipts functions are adequately segregated to safeguard Authority's assets?

Audit Results

The Board needs to improve the claims auditing process to ensure that all claims are properly audited and adequately supported. The Board did not ensure that an audit of claims was performed in compliance with Authority bylaws, which authorize the Treasurer to review all Authority bills. Instead, the Director performed the incompatible duties of auditing all claims, signing checks and approving purchases. Because the Board did not adequately segregate these duties, the Director has the ability to procure and pay for goods or services that may not be for valid Authority purposes.

Our review of 50 claims totaling \$25,144, disclosed that the Director audited these claims and approved the related purchases. He also signed checks for 48 claims totaling \$24,960 and purchase orders were not used to procure all goods and services. In addition, warrants were not always provided to the Board and the warrants that were provided did not include all claims the Director approved for payment. Although all these claims were for legitimate Authority purposes, when the Board does not ensure that an independent audit of claims is performed, purchases are approved before items are ordered and warrants are incomplete, there is an increased risk that improper purchases and payments could be made without detection.

The Board also needs to improve the cash receipt process to ensure cash receipt functions are adequately segregated to safeguard Authority assets. The Board did not adopt policies and written procedures for the Authority's cash receipt process. The clerk's duties were not adequately segregated because she was responsible for collecting receipts, recording transactions in the financial software, preparing and making bank deposits and preparing bank reconciliations. Authority officials did not implement compensating controls such as providing additional oversight or routinely reviewing her work, to ensure all collections received are reconciled with the amounts recorded and deposited. While our review of rental receipts did not disclose any discrepancies, these lack of segregation of duties increase the risk that discrepancies in the cash receipts process could occur and remain undetected and uncorrected.

Comments of Authority Officials

The results of our audit and recommendations have been discussed with Authority officials, and their comments, which appear in Appendix A, have been considered in preparing this report. Except as specified in Appendix A, Authority officials generally agreed with our recommendations and indicated they planned to initiate corrective action. Appendix B includes our comments on issues raised in the Authority's response.

Introduction

Background

The Rockville Centre Housing Authority (Authority) is located in the Village of Rockville Centre (Village) in Nassau County. The Authority was established pursuant to Section 410 of the Public Housing Law to provide low-rent housing for qualified individuals in accordance with relevant provisions of State Public Housing Law, and the rules and regulations prescribed by the Federal Department of Housing and Urban Development (HUD).

The Authority's 2015-16 operating expenditures totaled approximately \$755,829 funded mainly by rental income from tenants and HUD subsidies. The Authority manages 204 apartment units at two housing complexes located in the Village.

The Authority is governed by a six-member Board of Commissioners (Board) composed of five members appointed by the Village Mayor and one elected by the tenants. The Director, under the Board Chair's supervision, is responsible for the general management and control of Authority financial affairs. The Authority generally operates independently of the Village, managing its own operations and financial affairs. The Director, Board Chair, Secretary and Treasurer are authorized signers on the Authority's bank accounts. The Authority hired an accounting clerk (clerk) who is responsible for several Authority cash management functions including cash receipts.

Objective

The objective of our audit was to examine the Authority's claims auditing and cash receipts processes for the period October 1, 2015 through October 31, 2016. Our audit addressed the following related questions:

- Did the Board ensure that claims were properly audited, adequately supported and for legitimate Authority purposes?
- Did Authority officials ensure that cash receipts functions are adequately segregated to safeguard Authority assets?

Scope and Methodology

We examined the Authority's claims auditing and cash receipts processes for the period October 1, 2015 through October, 31, 2016.

We conducted our audit in accordance with generally accepted government auditing standards (GAGAS). More information on such standards and the methodology used in performing this audit are included in Appendix C of this report. Unless otherwise indicated in this report, samples for testing were selected based on professional

judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or relevant population size and the sample selected for examination.

**Comments of Authority
Officials and Corrective
Action**

The results of our audit and recommendations have been discussed with Authority officials and their comments, which appear in Appendix A, have been considered in preparing this report. Except as specified in Appendix A, Authority officials generally agreed with our recommendations and indicated they planned to initiate corrective action. Appendix B includes our comments on issues raised in the Authority's response.

Good management practices dictate that the Board has the responsibility to initiate corrective action. As such, the Board should prepare a plan of action that addresses the recommendations in this report and forward the plan to our office within 90 days.

Claims Auditing

An effective system for claims auditing should entail an independent, thorough and deliberate review to determine whether each claim is a legal obligation and proper charge against the Authority. Conducting a proper audit of claims before payment is an integral part of controls over the Authority's payment of claims and should ensure that every claim contains enough supporting documentation to enable the auditing officials to determine whether the claim is authorized and approved, sufficiently itemized and the amount claimed represents actual and necessary Authority expenditures. Purchase orders should be included in the supporting documentation to provide pre-approval accountability and a level of assurance that the requested items are needed and that sufficient funds are available.

To prevent paying claims that are not for valid Authority purposes, the Board should audit all claims before authorizing payment or appoint an independent claims auditor to do so on its behalf. The claims auditor should be independent of the purchasing and treasury (check signing) functions to minimize the risks associated with these incompatible duties. Further, the claims auditor should document the authorization to pay claims such as with a signed statement on a warrant (list of claims). Authority bylaws require that all claim checks are countersigned by the Board Chair or Director. Authority bank accounts list the Treasurer, Board Chair, Secretary and Director as authorized signers.

The Board needs to improve the claims auditing process to ensure that all claims are properly audited, adequately supported and for legitimate Authority purposes. The Board did not ensure that an audit of claims was performed in compliance with Authority bylaws, which authorize the Treasurer to review all Authority bills and advise the Board concerning the accuracy of such claims. Instead the Director audits all claims (after the clerk assembles the claims packets and prepares the warrant). The Director also signs the checks and approves all purchases. However, these duties (i.e., approving purchases, signing checks and auditing claims) are incompatible because the Director has the ability to procure and pay for goods or services that may not be for valid Authority purposes.

We reviewed 50 claims¹ totaling \$25,144 of 430 claims totaling \$301,126, which were paid during the audit period. We found several discrepancies.

¹ See Appendix C for information on our methodology.

- The Director was solely responsible for auditing these claims and approving the related purchases. He also signed checks for 48 claims totaling \$24,960. Performing the duties of approving purchases, signing checks and auditing claims are incompatible.
- Purchase orders were not attached to 47 claims totaling \$24,371. The Director told us that purchase orders are used only for purchases of goods and not services. Seven purchases totaling \$1,155 included on these claims were for purchases of goods such as paint, cleaning products, a faucet and other kitchen supplies and not supported by a purchase order.

We requested that Authority officials provide the 13 warrants for these 50 claims and found that warrants were not prepared or presented to the Board for four months of our audit period (December 2015 and February, April and August 2016). As a result, 14 of the 50 claims we reviewed totaling \$3,685 paid during these months were not presented to the Board for review until two months after the checks were issued and listed in the Treasurer's report.² These claims were for various purchases such as elevator refurbishing, printer leasing, phone/copier service and fire safety testing. Further, the Board did not review 139 claims totaling \$91,532 that the Director audited and paid during these four months.³

The nine warrants (with 219 claims totaling \$278,521) we examined did not include all the claims paid for those months. Consequently, six claims totaling \$5,752 (for cleaning services, electrical services, gas servicing, safety inspection, insurance and supplies) were not listed on these warrants. Additionally, the warrants did not include check numbers and the Director did not provide any documentation to the Board indicating that he audited the listed claims. The Director told us that claims paid after the Board meeting, in any particular month, would not appear on a warrant. However, three of these six claims totaling \$1,900 were subsequently presented to the Board and included in the Treasurer's report, two months after the checks were issued.

Although all the claims we reviewed were for legitimate Authority purposes, when the Board does not ensure that an independent audit of claims is performed and purchases of goods and services are approved before they are ordered there is an increased risk that improper purchases and payments could be made without detection.

² The Treasurer's report is generally presented to the Board two months after checks are issued. The Board did not meet in December 2015 or August 2016.

³ These 139 claims included 14 of the 50 claims we reviewed.

Additionally, because purchase orders are not required for all purchases, Authority officials are not provided with pre-approval accountability and a level of assurance that the requested items are needed and that sufficient funds are available. Because warrants are not always prepared each month and the Board reviews incomplete warrants, improper payments could be made without detection.

Recommendations

The Board should:

1. Ensure that a deliberate and thorough audit of claims is performed before payment is made by someone independent of purchasing and check signing.
2. Ensure it reviews warrants signed by the claims auditor, which list all claims approved by the claims auditor.
3. Ensure that the claims auditor compares the warrant with the claims packet before checks are signed.
4. Consider revising the procurement policy to require the use of purchase orders for all purchases.

Cash Receipts

The Board is responsible for establishing internal controls to properly safeguard the Authority's assets. To fulfill this duty, it is important the Board establish written policies and procedures for cash receipts that address the duties, procedures, records and oversight required to provide assurance that Authority funds are adequately collected, safeguarded and accounted for. This also includes adequately segregating duties to ensure that one employee does not control all phases of financial transactions. When it is not practical to segregate duties because of limited resources, Authority officials should implement compensating controls, such as routinely reviewing and monitoring employees' work.

The clerk and other employees are authorized to collect receipts at the Authority's central office and the housing complexes. Cash receipts totaling approximately \$573,000 were collected during our audit period and consisted of tenant rents, HUD subsidies, which help reduce rents for low income tenants, management fees and coin-operated laundry money. Tenant rents are usually paid by check, money order or bank draft but occasionally are paid in cash. Management fees are paid by check and HUD subsidies are received by electronic bank transfers. Authority employees issue computer-generated receipts to tenants for all rent payments.

The Board needs to improve its cash receipt process to ensure cash receipt functions are adequately segregated to safeguard Authority assets. The Board did not adopt policies and written procedures for the Authority's cash receipt process. The clerk's duties were not adequately segregated because she was responsible for collecting receipts, recording transactions in the financial software, preparing and making bank deposits and preparing bank reconciliations. Authority officials did not implement compensating controls, such as providing additional oversight or routinely reviewing the clerk's work, to ensure that all collections received are reconciled with the amounts recorded and deposited.

Although an independent consultant reviewed and reconciled tenant rents receivable and ensured that payments were posted correctly to tenant accounts, this review did not include verifying that all receipts collected were adequately recorded and deposited. When the clerk's duties include all phases of the cash receipt function and adequate oversight is not provided, there is an increased risk that errors could occur and go undetected.

We reviewed all cash receipts totaling \$19,505 paid by 48 tenants in August 2016. We traced these receipts to the bank statements and general ledgers to determine whether the clerk deposited them intact in a timely manner and accurately recorded these transactions in the financial software. We reviewed Authority financial reports from August through October 2016, including the tenant historical ledger, family report (an itemized tenant cash receipts list) and rental register, to determine whether individual payments received from 25 tenants were accurately recorded and these tenants were correctly billed. We also reviewed the rental register for August 2016 and traced these entries to the family report to determine whether all tenants listed on the register were being billed.

Although the results of our testing did not reveal any discrepancies, because the clerk's duties were inadequately segregated and Authority officials did not review her work, discrepancies in the cash receipts process could occur and remain undetected and uncorrected.

Recommendations

The Board should:

5. Develop and adopt policies and written procedures for collecting, processing, recording and depositing cash receipts.
6. Ensure that the clerk's duties are adequately segregated or implement compensating controls, such as providing supervisory review of her work.

APPENDIX A

RESPONSE FROM AUTHORITY OFFICIALS

The Authority officials' response to this audit can be found on the following pages.



ROCKVILLE CENTRE HOUSING AUTHORITY

Rockville Centre Housing Associates, LP

160 North Centre Avenue, Rockville Centre, New York 11570

Phone: (516) 536-4343 * Fax (516) 536-6616 * E-mail rvcha@optonline.net

Jamie L. Morrison, Executive Director

June 6, 2017

*Mr. Ira McCracken, Chief Examiner
Division of Local Government & School Accountability
State of NY Office of the State Comptroller
110 State Street
Albany, New York 12236*

***Re: Rockville Centre Housing Authority – Claims Auditing and Cash Receipts
Report of Examination (October 1, 2015 – October 31, 2016) – 2017M-57***

Dear Mr. McCracken:

Enclosed please find the response and Corrective Action Plan from the Rockville Centre Housing Authority to the above noted preliminary draft finding for your review and consideration. I want to take this opportunity to let you know we have reviewed the report and would like to address a few areas that were cited in the report.

- 1. Treasurer reviewing all Authority bills: The current procedure pertaining to procuring and payment for goods and services is as follows. The Director is authorized to procure services for the Authority on an as needed basis. When securing these services the Director will request quotes from vendors to review and then select the most reasonable quote. Three other staff members are responsible for ordering goods and services. The process requires them to submit Purchase Orders to the Director for final approval before ordering. When goods are delivered they review invoices to assure that the goods purchased and the delivered are correct. The Director will sign off on invoices and submit to the Finance Manager for payment. All checks require two signatures of which one is always a Board member. They invoices are also reviewed by the Commissioner before signing.***

2. While the Board has oversight of all purchases and expenses, it is not always practical for the Treasurer to view “all” bills before they are paid. Many of the bills are paid on a regular monthly basis: electric, water/heating, phones, local, school and PILOT taxes, and contractual services. However, in addition to the Finance Manager the Treasurer prepares a warrant to be reviewed and approved by the Board at the monthly board meetings.

See
Note 1
Page 15

3. Purchase Orders: Purchase Orders are used for purchase of services from some vendors for items such as appliances, maintenance and office supplies. Purchase orders are not used for on-going monthly goods and services such as utilities, phones taxes and contractual services. All contractual services are supported by a Check Requisition Form made out and signed by the Director.

See
Note 2
Page 15

4. The Board and the Director will work together to adopt policies and written procedures for the Authority’s cash receipt process.

5. The Authority agrees to the segregation of duties where the Finance Manager (Clerk) is concerned and will remove her from receiving and inputting rents, from tenants, into the system.

6. The Authority will consider making one individual staff person responsible for reviewing invoices when goods are purchased, by the agency, before forwarding to the Finance Manager.

7. As a means of reviewing and auditing all claims and expenses it should be noted that additional internal controls are in place. A monthly audit and reconciliation of all expenses are conducted by the agency Fee Accountant. In addition the treasure also reviews monthly expenses and prepares a warrant for the entire board. Annual audits are also conducted by an outside Accounting firm for the Housing Authority. A review of our annual Audit Reports have shown that the agency is in good standing and in compliance with all required standards and procedures.

See
Note 3
Page 15

Please be advised that upon review of this preliminary report, the Housing Authority and Board of Commissioners will move to act on and present a plan of action for the following recommendation of the report to:

- 1. Ensure that a deliberate and thorough audit of claims is performed before payment is made by someone independent of purchasing and check signing,**
- 2. Ensure it reviews warrants signed by the claims auditor, and**
- 3. Ensure the claims auditor compares the warrant with the claims packet before checks are signed.**

Let me take this opportunity to thank you for your insight and recommendations that will only serve to enhance the performance of the Rockville Centre Housing Authority. If you have any questions, please feel free to contact me.

Sincerely,

*Jamie Morrison
Executive Director*

*cc: Robert Pagnotta, Chairman (Board of Commissioners)
Board of Commissioners
Files*

APPENDIX B

OSC COMMENTS ON THE AUTHORITY'S RESPONSE

Note 1

The Authority's bylaws require the Treasurer to review all Authority bills and the bylaws do not authorize payments in advance of an audit. As recommended in our report, an audit of claims should be performed by someone independent of purchasing and check signing functions.

Note 2

Although Authority officials indicated purchase orders are used for items such as appliances, maintenance and office supplies, that was not always the case. During our audit, we identified 28 claims totaling \$10,165 for such items that did not have a purchase order. Regardless, good business practices require using purchase orders for all purchases of goods and services to provide preapproval accountability, assurance that requested items are needed and that sufficient funds are available, which limits unauthorized purchases.

Note 3

Based on our interviews and observation, the Agency's fee accountant reviews expenditures at month-end to ensure that they are correctly recorded in the accounting system. This additional control does not constitute as an audit of claims and would not necessarily detect payments made for unauthorized Agency purposes.

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

To achieve our audit objective and obtain valid evidence, we performed the following procedures:

- We interviewed Authority officials and employees to gain an understanding of Authority operations, procedures over claims auditing, check signing, approval of purchases, cash receipts and accounting system controls over cash receipts. We also reviewed the Authority's bylaws to determine who the Board authorized to audit claims and sign checks.
- We randomly selected 50 cancelled checks from the operating checking account and reviewed the corresponding claims packet to determine whether these claims were adequately supported, for appropriate Authority purposes and properly audited.
- We judgmentally selected 25 tenant names from the tenant historical ledger (every other name) and reviewed this ledger report, rental registers, cash receipts and the family reports for August, September and October 2016 (the three most recent months of operations before the start of our audit fieldwork) for these tenants. We compared information contained in the rental registers and tenant historical ledger report to the cash receipt records to determine whether these records agreed. We also used this information to calculate these tenants' account balances each month and compare it with the tenant historical ledger report to determine whether there were any discrepancies.
- We reviewed cash receipts paid by all 48 paying tenants⁴ for one of the two housing complexes for August 2016 to determine whether receipts were properly recorded and deposited. We selected this month because it was one of the three most recent months of operation before we began our fieldwork. We traced the tenant receipts to the rental register, general ledger and bank statements to determine whether all receipts were properly recorded in the financial software and adequately deposited in the Authority's bank account.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

⁴ Authority officials managed 204 apartment units during our audit period. One apartment was vacant and another was occupied by the building superintendent who does not pay rent as authorized in his Board-approved contract.

APPENDIX D

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