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October 25, 2022

Jessica S. Tisch  
Commissioner  
New York City Department of Sanitation  
125 Worth Street  
New York, NY 10013

Daniel Steinberg  
Director  
Mayor's Office of Operations  
253 Broadway – 10th Floor  
New York, NY 10007

Re: Street and Sidewalk Cleanliness  
Report 2022-F-8

Dear Commissioner Tisch and Director Steinberg:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article III of the General Municipal Law, we have followed up on the actions taken by officials of the New York City Department of Sanitation and the Mayor's Office of Operations to implement the recommendations contained in our audit report, *Street and Sidewalk Cleanliness* (Report [2019-N-1](#)).

**Background, Scope, and Objective**

The New York City (NYC) Department of Sanitation's (DSNY) mission is to keep NYC clean, safe, and healthy – by collecting, recycling, and disposing of waste; cleaning streets and vacant lots; and clearing snow and ice.

DSNY has access to several data sources to monitor the cleanliness of NYC's streets and sidewalks, including: Scorecard Ratings created by the NYC Mayor's Office of Operations (Operations); NYC311 service requests data; and other daily records, such as DSNY's Mechanical Broom Daily Performance logs. Together, these data sources can help DSNY identify ongoing problem areas and evaluate the effectiveness of its sanitation operations.

The Scorecard Rating is a monthly performance metric of the percentage of acceptably clean streets and sidewalks in Sanitation Cleaning Districts and Sections. The Scorecard Rating also provides an overall rating by borough as well as citywide for the period covered. Operations' Scorecard Ratings of "acceptably clean," "not acceptably clean," or "filthy" are based on inspectors' drive-by inspections for a sample of blockfaces. Scorecard Ratings are published monthly and in the DSNY section of the bi-annual Mayor's Management Report, a document that contains performance metrics for all NYC agencies.

Our initial audit report, issued on September 16, 2020, examined whether DSNY effectively monitors the cleanliness of NYC's streets and sidewalks. The report also assessed the methodology used by Operations to rate street and sidewalk cleanliness. The audit, which covered the period January 1, 2015 to September 27, 2019, found that DSNY needed to improve its communication, coordination, and record keeping processes to efficiently and effectively address persistent cleanliness problems on NYC streets and sidewalks. DSNY had not used its tools to identify problem areas or trends to mitigate root causes. In addition, we found that DSNY did not effectively utilize or share relevant information across its bureaus and divisions. We also found that DSNY did not monitor the daily performance of its street cleaning staff, nor do supervisors monitor the cleanliness of NYC streets and sidewalks. Furthermore, DSNY did not have its own performance measures for meeting the cleaning needs of streets and sidewalks in addition to Scorecard Ratings.

Our audit also identified certain weaknesses in the methodology used by Operations to rate street and sidewalk cleanliness. For example, the inspections for Scorecard Ratings were performed from a moving car, making it difficult for the inspectors to have an unobstructed view of the street/sidewalk being rated. In addition, as Operations did not maintain a written copy of the blockface sample selections methodology, there was no assurance that the methodology used population density or other factors, such as land use, that may have a greater impact on public perception of an area's cleanliness when more individuals view the same location. Furthermore, blockface segments were not predefined on the inspection maps and, therefore, inspectors used their own judgment to determine the segments for a given blockface. Operations also applied a stricter criterion in calculating its Scorecard Ratings.

The objective of our follow-up review was to assess the extent of implementation, as of August 26, 2022, of the eight recommendations – four each to DSNY and Operations – included in our initial report.

### **Summary Conclusions and Status of Audit Recommendations**

DSNY did not make progress in addressing the problems identified in the initial audit report. None of the initial report's four recommendations to DSNY were implemented.

Operations made progress in addressing the problems identified in the initial audit report. Of the initial report's four audit recommendations to Operations, three were implemented and one was partially implemented.

### **Follow-Up Observations**

#### **To DSNY:**

#### **Recommendation 1**

*Use all available data sources, such as NYC311 service requests, violation summons data, and internal DSNY monitoring tools, to routinely identify specific areas with recurring dirty streets and sidewalks, and take appropriate corrective actions.*

Status – Not Implemented

Agency Action – DSNY did not provide assurance that it uses available data sources to routinely identify specific areas with recurring dirty streets and sidewalks to take appropriate corrective actions. DSNY officials responded that they use a new system, PowerBI, as

a reporting tool to identify sanitation issues across all boroughs. This system is based on NYC311 service requests and summons data. However, as was found in the old system used by DSNY, the new system does not show where problems are recurring. While PowerBI can display concentrations of NYC311 complaints over a NYC map with selectable variables and zoom in to specific streets, DSNY did not provide support that it uses the data to identify specific areas (e.g., blockfaces) with recurring problems. DSNY officials stated that, due to COVID-19-related cuts, they did not pursue any new development of data sharing applications. However, as stated in the recommendation, all of these data sources already exist within DSNY.

Furthermore, in May 2022, we visited a judgmental sample of 11 blockfaces with multiple NYC311 complaints received and verified by DSNY to determine whether DSNY's monitoring tools capture ongoing problem conditions. Based on our observations, we determined that all 11 sampled blockfaces were dirty before and after the scheduled street cleaning times. We used Operations' Scorecard Ratings criteria to determine whether the blockfaces were dirty.

DSNY maintains several internal tools to monitor sanitation conditions, but we found that these tools did not adequately identify the observed dirty conditions. For example, only one of the 11 dirty blockfaces was identified on the District Condition Drop-Off logs, which are used by DSNY to identify areas that need to be or have been cleaned. In addition, the Mechanical Broom Daily Performance log, which street sweeper operators use to document whether scheduled cleaning was performed, did not include the areas with the dirty conditions we observed despite being scheduled for cleaning. Finally, only one of the 11 blockfaces that we identified as dirty was included on DSNY's Areas of Concern watch list and the District Cleaning Issues list, a list of known areas with recurring issues.

### **Recommendation 2**

*Identify the root causes for recurring dirty conditions, and develop solutions to address them beyond the immediate need for cleaning. This can include seeking community, department, and cross-agency engagements, where appropriate.*

Status – Not Implemented

Agency Action – We found that DSNY did not identify the root causes for recurring dirty conditions. DSNY officials disagreed with this recommendation and stated that DSNY supervisors monitor on a daily basis the cleanliness of NYC streets and sidewalks as well as the performance of all staff assigned to street cleaning. They also stated that DSNY is in the process of implementing a GPS system on each street sweeper, which they expected would be completed by the end of 2022. Officials stated that once the GPS system is fully implemented, it will help identify whether a sweeper traveled on a specific street, but acknowledged that GPS data alone would not show whether the street had been swept.

Furthermore, DSNY officials responded that they engage the community in a variety of ways, such as attending community board meetings and walk-throughs for elected officials. DSNY provided two examples of such engagements: an April 2022 District Service Cabinet meeting (attended by multiple agencies) and a June 2022 interagency walk-through attended by DSNY officials. However, the locations and conditions

discussed during these meetings either were not added to or were not already on DSNY's May 2022 Areas of Concern watch list or District Cleaning Issues list. In addition, DSNY officials did not provide adequate documentation demonstrating how they identified the root causes of these conditions and what solutions were developed to address them, or whether DSNY tracked if these solutions improved the conditions.

As discussed previously, outside of day-to-day cleaning activities, not all recurring dirty conditions were readily identified; only one of the 11 blockfaces was included on DSNY's Areas of Concern watch list and District Cleaning Issues list. This mirrors the results in the original audit. Furthermore, while DSNY may respond to individual service requests for cleaning, DSNY could not point to specific steps taken to identify and address root causes of recurring conditions.

### **Recommendation 3**

*Develop and implement DSNY-driven performance measures for meeting the cleaning needs of NYC's streets and sidewalks that can be used in addition to Scorecard Ratings.*

Status – Not Implemented

Agency Action – DSNY did not develop and implement DSNY-driven performance measures for meeting the cleaning needs of NYC's streets and sidewalks. Officials stated that developing and implementing an internal DSNY-driven performance measure requires resources for proper research and development, and creating an internal measure requires a structured methodology. According to officials, DSNY did not dedicate the resources for such development due to budget constraints caused by the COVID-19 pandemic.

As of July 5, 2022, DSNY restored street sweeping to pre-pandemic levels citywide. Alternate side parking restrictions that had been reduced to once per side per week were increased to at least twice per side per week. The service restoration was made without consideration as to whether certain parts of the city were able to meet and maintain the performance goal of 92% acceptably clean streets. According to the Scorecard Ratings, some districts on average maintained at least 92% acceptably clean streets throughout the pandemic despite the street sweeping reduction. Thus, DSNY may be using its limited resources on areas that do not need as much cleaning as others; in addition, car owners may be required to move their cars more frequently than necessary. For example, between July 2019 and April 2022, for Manhattan District MN07 (which includes Lincoln Square, Manhattan Valley, and Upper West Side), its street Scorecard Ratings averaged 98.0. With the full restoration of street sweeping, car owners in this district have to move their cars as frequently as those in districts with lower-rated streets, such as Brooklyn District BKN16 (which includes Broadway Junction, Brownsville, and Ocean Hill), which averaged 78.3 in its street Scorecard Ratings. Had DSNY developed its own performance measures, it may have been able to focus on more specific areas that required additional cleaning. DSNY officials noted that some districts and sections had missing monthly Scorecard Ratings during this time frame.

#### **Recommendation 4**

*Develop measures to ensure the reliability of DSNY's monitoring data so that management can make appropriate governance decisions.*

Status – Not Implemented

Agency Action – DSNY did not develop measures to ensure the reliability of DSNY's monitoring data so that management can make appropriate governance decisions. Again, DSNY officials stated that developing and implementing an internal DSNY-driven performance measure requires resources for proper research and development, and creating an internal measure requires a structured methodology. According to officials, DSNY did not dedicate the resources for such development due to the budget constraints caused by the COVID-19 pandemic.

As stated previously, our sampled observations of dirty conditions were not captured by DSNY monitoring tools (e.g., Condition Drop-Off log, Mechanical Broom Daily Performance log, Areas of Concern watch list, District Cleaning Issues list), indicating that improvements were not made to DSNY's monitoring data.

#### **To Operations:**

#### **Recommendation 5**

*Ensure that the appropriate criteria are applied when calculating Scorecard Ratings.*

Status – Partially Implemented

Agency Action – Operations now uses a different coding language to process the Scorecard Ratings methodology. We tested the March 2022 Scorecard Ratings and found that the appropriate criteria had been applied for determining acceptably clean streets and sidewalks. However, Operations applied a 1.75 or greater Scorecard Rating as a "filthy" street or sidewalk instead of the correct 1.8 threshold.

#### **Recommendation 6**

*Explore the value of performing inspections from outside of the inspection vehicle or using other methodologies that provide an unobstructed view of the blockfaces being rated.*

Status – Implemented

Agency Action – In July 2020, Operations started a pilot program requiring the raters to stop at each blockface and exit the vehicle to conduct their ratings. Operations' analysis showed that having individual raters exit the vehicle reduced the number of blockfaces that could be rated per shift. Presently, raters are advised to exit the vehicle when needed for the rating, as time allows.

#### **Recommendation 7**

*Re-establish the sampling methodology to ensure that sampled blockfaces are representative of NYC streets and sidewalks.*

Status – Implemented

Agency Action – Operations updated its methodology of selecting blockfaces to inspect. Whereas the old methodology used the same static blockfaces each month, the new methodology selects new blockfaces across NYC each month, with digital navigation replacing the previous paper maps.

### **Recommendation 8**

*Develop guidance for determining segment definitions for blockface inspections.*

Status – Implemented

Agency Action – Operations’ officials provided documentation showing that they developed new guidance for determining segment definitions for blockface inspections. Based on the guidance, each blockface is divided into two, three, or four segments depending on its length, and raters can individually rate the street and sidewalk cleanliness status for each segment within a blockface. We tested 10 rated segments to ensure the guidance had been followed and found that all 10 segments were in compliance with the new guidance.

Major contributors to this report were Joseph Gillooly, Faisal Nadeem, and Lillian Fernandes.

We would appreciate your response to this report within 30 days, indicating any actions planned to address the unresolved issues discussed in this report. We thank the management and staff of DSNY and the Mayor’s Office of Operations for the courtesies and cooperation extended to our auditors during this review.

Very truly yours,

David Schaeffer  
Audit Manager

cc: Doug Giuliano, NYC Mayor’s Office of Operation  
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