

New York State Comptroller  
THOMAS P. DiNAPOLI

# Homes and Community Renewal

Housing Trust Fund Corporation:  
Oversight of the Access to Home for  
Heroes/Veterans Program

July 2026 | Report 2025-S-10

Prepared by the Division of State Government Accountability

# Audit Highlights

---

## Objective

To determine whether Homes and Community Renewal and Local Program Administrators properly administer the New York Access to Home for Heroes/Veterans Program in accordance with program requirements. The audit covered the period from April 2022 through December 2025.

## About the Program

New York State Homes and Community Renewal (HCR) is the State's affordable housing agency, with a mission to develop, preserve, and protect affordable housing and increase homeownership throughout New York State. HCR comprises several of New York State's major housing and community renewal agencies and authorities, including the Housing Trust Fund Corporation (HTFC). HTFC's Office of Community Renewal (OCR) provides funding to local governments and not-for-profits to administer several housing programs, including the Access to Home for Heroes/Veterans Program (Program). The Program provides financial assistance to make accessibility modifications and emergency home repairs or address code violations to the primary residences (residential units) of low- and moderate-income veterans with disabilities.

According to the U.S. Census Bureau, disabled veterans account for approximately 29% of the State's 607,000 veterans. According to Article 30 of the New York State Private Housing Finance Law (Law), many veterans face significant impediments to accessible and affordable housing because of service-related injuries, age, or health-related disabilities. Passed in 2018, the Law formally established the Program to assist disabled veterans with home repairs to ensure they can live comfortably and safely in their homes.

Every fiscal year (April 1–March 31), OCR releases a request for applications (RFA) for Program funding. Interested units of local government and non-profit organizations are eligible to apply for funding. Awarded recipients, also referred to as Local Program Administrators (LPAs), enter into a 2-year contract with HTFC and are responsible for administering the Program in a specified service area (typically a county).

Awarded LPAs receive funds from OCR on a reimbursement basis for project costs incurred. Although the Law does not limit the amount of funding for individual units, according to the RFA, costs for each residential unit assisted under the contract cannot exceed \$25,000. For the 3 fiscal years ended March 31, 2024, HTFC awarded 15 contracts totaling \$3.3 million to 12 LPAs; however, only \$1.2 million (36%) had been spent as of October 2025.

OCR Program Managers are required to monitor LPAs by conducting first project file reviews (OCR's comprehensive review of the first project of each contract) and to monitor contract performance and timeliness to ensure that funds are expended in a timely manner and in

accordance with applicable laws, rules, and regulations. In addition, Program progress should be monitored by OCR's staff conducting site and desk reviews. Further, OCR Program Managers must ensure LPAs maintain complete project files, comply with bidding requirements, and implement a conflict-of-interest policy. Finally, OCR should promote the Program to potential applicants throughout the State and ensure that LPAs implement marketing strategies that ensure a wide population of disabled veterans are aware of the available funding opportunities.

## Key Findings

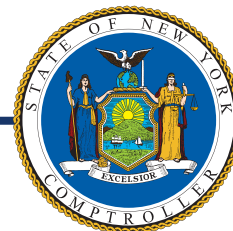
HCR did not effectively monitor LPAs' performance under the Program contracts or establish sound marketing practices to ensure that Program funds were provided to a wide population of disabled veterans and in a timely manner. Specifically, we found that:

- OCR does not adequately monitor LPAs to ensure they comply with Program requirements, such as maintaining complete project files, including support for eligibility, adhering to established milestones, submitting first file records correctly or on time, using funds within contract terms (time limit), or adhering to project funding limits. We reviewed a sample of 10 contracts at a sample of seven LPAs and found:
  - For eight of the 10 (80%) contracts, all seven sampled LPAs missed at least one key contract milestone, resulting in veterans being unable to obtain timely assistance from the Program.
  - For two of the 10 (20%) contracts, no first file review was submitted despite being 10 months into their contract, resulting in veterans not being served timely.
  - For seven of the 10 (70%) contracts, the first file reviews were either missing records or contained incorrect information, resulting in potential improper use of Program funds.
- LPAs do not comply with Program requirements related to bidding practices and conflicts of interest.
  - For three of the 10 (30%) contracts, we identified questionable bidding practices, such as an LPA's disclosure of one bidder's estimate to another, which can result in the selection of unqualified contractors, inflated costs, or unsupported payments.
  - For two of the 10 (20%) contracts, LPAs did not comply with the conflict-of-interest requirements, which can result in the inappropriate selection of contractors. For example, one LPA contracted with a relative without approval from OCR.
- Neither OCR nor LPAs adequately market the Program, resulting in less awareness of the Program and its opportunities. For example:
  - Of the nine LPAs that stated they would advertise the Program on their websites and social media platforms, only two (22%) have done so.

- For our scope period, only 14 applicants proposing to serve 28 counties applied for funding, and only 12 LPAs proposing to serve 22 counties received Program funding.
- As of October 2025, 10 months into the contract term, only nine of the 12 awarded LPAs have started projects to serve disabled veterans in 15 of New York's 62 counties.

## Key Recommendations

- Improve monitoring of LPAs throughout the term of the contracts, including:
  - Increasing frequency and quality of site visits to and desk reviews of LPAs to provide needed assistance and to ensure awarded funds are used promptly to assist disabled veterans.
  - Regularly reviewing project files to ensure compliance with Program requirements, including those related to participant eligibility, contractor procurement, and conflicts of interest.
  - Adequately reviewing each LPA's marketing and outreach efforts and ensuring LPAs adhere to their marketing plans, as well as working with LPAs to identify effective marketing and outreach strategies and opportunities.
- Develop and implement effective marketing and outreach strategies, including conducting research and analysis to identify areas with a high concentration of disabled veterans and targeting outreach to municipality officials and veteran groups, to promote the Program.



---

**Office of the New York State Comptroller  
Division of State Government Accountability**

July 27, 2026

RuthAnne Visnauskas  
Commissioner/CEO  
Homes and Community Renewal  
641 Lexington Avenue  
New York, NY 10022

Dear Commissioner Visnauskas:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Housing Trust Fund Corporation: Oversight of the Access to Home for Heroes/Veterans Program*. This audit was performed pursuant to the State Comptroller's authority under Article V, Section 1 and Article X, Section 5 of the State Constitution; Article II, Section 8 of the State Finance Law; and Section 2803 of the Public Authorities Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

*Division of State Government Accountability*

# Contents

---

|                                                                |           |
|----------------------------------------------------------------|-----------|
| <b>Glossary of Terms</b>                                       | <b>7</b>  |
| <b>Background</b>                                              | <b>8</b>  |
| <b>Audit Findings and Recommendations</b>                      | <b>9</b>  |
| Inadequate Oversight and Monitoring of LPAs                    | 10        |
| LPAs' Non-Compliance With Program Requirements                 | 14        |
| Insufficient Promotion, Outreach, and Marketing of the Program | 17        |
| Recommendations                                                | 20        |
| <b>Audit Objective, Scope, and Methodology</b>                 | <b>21</b> |
| <b>Statutory Requirements</b>                                  | <b>23</b> |
| Authority                                                      | 23        |
| Reporting Requirements                                         | 23        |
| <b>Exhibit A</b>                                               | <b>24</b> |
| <b>Exhibit B</b>                                               | <b>25</b> |
| <b>HCR Response and State Comptroller's Comments</b>           | <b>26</b> |

# Glossary of Terms

---

| Term    | Description                                | Identifier      |
|---------|--------------------------------------------|-----------------|
| HCR     | Homes and Community Renewal                | <i>Auditee</i>  |
| HTFC    | Housing Trust Fund Corporation             | <i>Division</i> |
| Law     | New York State Private Housing Finance Law | <i>Key Term</i> |
| LPA     | Local Program Administrator                | <i>Key Term</i> |
| Manual  | OCR's LPA Manual                           | <i>Key Term</i> |
| OCR     | Office of Community Renewal                | <i>Office</i>   |
| Plan    | Monitoring Plan                            | <i>Key Term</i> |
| Program | Access to Home for Heroes/Veterans Program | <i>Key Term</i> |
| RFA     | Request for applications                   | <i>Key Term</i> |

# Background

---

New York State Homes and Community Renewal (HCR) is the State's affordable housing agency, with a mission to develop, preserve, and protect affordable housing and increase homeownership throughout New York State. HCR comprises several of New York State's major housing and community renewal agencies and authorities, including the Housing Trust Fund Corporation (HTFC). HTFC's Office of Community Renewal (OCR) provides funding to local governments and not-for-profits to administer several housing programs, including the Access to Home for Heroes/Veterans Program (Program).

According to the U.S. Census Bureau, disabled veterans account for approximately 29% of New York State's 607,000 veterans. According to Article 30 of the New York State Private Housing Finance Law (Law), many veterans face significant impediments to accessible and affordable housing because of service-related injuries, age, or health-related disabilities. In 2015, New York State allocated more than \$19 million to HCR's Access to Home Program to serve veterans with a disability incurred in a time of war. Passed in 2018, the Law formally established Access to Home for Heroes/Veterans and expanded funding to veterans with non-service-related disabilities. The Program provides financial assistance to make accessibility modifications and emergency home repairs or address code violations to the primary residences (residential units) of low- and moderate-income veterans with disabilities.

Every fiscal year (April 1–March 31), OCR releases a request for applications (RFA) for Program funding. Interested units of local government and non-profit organizations are eligible to apply. Awarded recipients, also referred to as Local Program Administrators (LPAs), enter into a 2-year contract with HTFC, and are responsible for administering the Program in a specified service area (typically a county). Program progress should be monitored by OCR's staffing conducting site and desk reviews. Although the Law does not limit the amount of funding for individual projects, according to the RFA, costs for each project under the contract cannot exceed \$25,000. Awarded LPAs receive funds from OCR on a reimbursement basis for project costs incurred. OCR's LPA Manual (Manual) describes the policies and procedures that LPAs must follow in implementing the Program.

In the 3 fiscal years ended March 31, 2024, HTFC awarded 15 contracts totaling \$3.3 million to 12 LPAs and, as of October 2025, LPAs had spent just \$1.2 million on work on 81 residential units.



## Explore Our Interactive Maps

For more information on total veteran and disabled veteran populations by county, number of Program applicants, and amounts awarded by county by fiscal year, see our [interactive maps](#) available on our website.

# Audit Findings and Recommendations

---

New York State is home to about 173,000 disabled veterans, many of whom may face significant impediments to accessible and affordable housing because of their disabilities. The goal of the Program is to assist disabled veterans with home repairs to ensure they can live comfortably and safely in their homes. It is, therefore, critical that the Program be run effectively and in accordance with applicable laws, policies, and procedures, and necessary funding be provided to eligible veterans in a timely manner.

However, we found that OCR has fallen short of effectively monitoring LPAs' performance under the contracts or establishing sound marketing practices to ensure that Program funds are provided to a wide population of disabled veterans in a timely manner. In the 3 fiscal years ended March 31, 2024, only 14 applicants that proposed to serve a total of 28 counties applied for funding, and only 12 LPAs that proposed to serve 22 counties received Program funding. As of October 2025, only nine of the 12 LPAs had started a total of 81 projects to serve disabled veterans in 15 of 62 New York State counties, spending \$1.2 million of the \$3.3 million OCR awarded. (For more information on total veteran and disabled veteran populations by county, number of Program applicants, and amounts awarded by county by fiscal year, see the Background for a link to interactive maps available on our website.)

We found that the seven sampled LPAs have missed project milestones, and five LPAs did not maintain sufficient project file documentation. Furthermore, three LPAs did not comply with bidding requirements, and one LPA did not implement a conflict-of-interest policy, as required. Moreover, we found weaknesses in OCR's LPA selection process. For example, OCR officials do not consider factors such as disabled veteran population.

OCR officials also do not have a process to identify areas with a high concentration of veterans to help them to prioritize their outreach efforts, even though comprehensive State veteran data is readily available on the U.S. Census Bureau's website. Additionally, OCR officials delegated the marketing activities to the contracted LPAs and required Program applicants to submit a marketing plan on their applications. Although LPAs included these activities on their applications, we found their actual efforts deviated from their marketing plans. For example, of the nine LPAs that stated they would advertise the Program on their websites and social media platforms, only two (22%) have done so.

Failure to address these issues leaves the State's disabled veterans underserved, limiting their opportunities to live in safe and accessible homes. We encourage OCR officials to take a stronger oversight role in Program delivery, improve advertising of the opportunities to potential LPAs and veterans, and to proactively identify and address weaknesses, including those discussed in this report.

## Inadequate Oversight and Monitoring of LPAs

OCR does not adequately monitor LPAs to ensure they comply with Program requirements, including completing first file reviews correctly or on time, adhering to OCR's set milestones, using funds within contract terms (time limits), or adhering to project funding limits.

### Inadequate First File Review

According to the Manual, LPAs must complete a Project File Checklist detailing the records that they are required to maintain in their files for all projects completed under the contract (see Exhibit A). LPAs are also required to submit all supporting records from the checklist for the first project of each contract to OCR. OCR Program Managers are required to monitor LPAs by, among other actions, reviewing the records submitted for the first project under the contract, a process also referred to as the first file review. The first file review is a two-step process in which OCR Program Managers review the project file records at the time of the project setup and later at the time of the project completion. The primary purpose of first file reviews is to ensure LPAs are adhering to the Program requirements, undertaking viable projects, and vetting veterans' eligibility. Additionally, the Manual states that Program progress will be monitored by OCR staff through desk reviews and site visits.

We reviewed the first file review setup and completion records that OCR approved for eight of the 10 sampled contracts. Two LPAs—Community Development Corporation of Long Island (CDCLI) and United Way of Long Island (UWLI)—had not yet started any projects at the time of our review. We found seven of the eight contracts (88%) were either missing records or had incorrect information. Specifically:

- Two contracts at Arbor Housing & Development (Arbor) included inadequate documentation. One included a bid solicitation log for a different project, and another did not include adequate support for the participant's disability.
- The contract at Rockland Independent Living Center d.b.a. BRIDGES (BRIDGES) had a submission that did not include the required internal cost estimate for the project.
- For the contract at Family Service Society of Yonkers (FSSY), the LPA submitted records for the first file review for the wrong project, and the OCR Program Manager did not realize the error until several months later. Consequently, OCR approved the first file review setup and completion for the project more than 9 months after the project was completed. Moreover, we found no evidence that OCR conducted a desk review or site visits to FSSY to ensure that the LPA officials clearly understood and complied with the contract requirements pertaining to the first file review.
- For the contract at Rebuilding Together New York City (RTNYC), the first file review records were missing multiple essential records, such as the contractor's waiver of liens, an internal cost estimate, and proof of payment to the contractor. Additionally, while the files included documentation to support the veteran's disability, the documentation did not

describe limitations caused by the disability or recommend structural modifications, as required.

- Two contracts at Rebuilding Together Saratoga County (RTSC) were missing verification of veteran status and the internal cost estimate.

Without accurate and complete first file reviews, OCR limits its monitoring of LPAs' performance under the contracts and, therefore, has no reasonable assurance that the providers adhere to Program requirements, Program funds are used properly, and services are provided to eligible participants.

## **Missed Milestones**

According to OCR's Procedures, OCR officials should monitor LPAs' contract performance and timeliness to ensure that funds are expended in a timely manner and in accordance with applicable laws, rules, and regulations. To that end, OCR has established a Monitoring Plan (Plan) with expected milestones (five milestones in total). The Plan, which is sent to LPAs at the start of each contract, states that OCR Program Managers are responsible for monitoring LPAs' adherence to the five contract milestones. The Plan also states that OCR Program Managers must reach out to LPA officials if they miss the expected milestone by which LPA officials must have:

- Submitted the first file review setup documents to OCR officials.
- Committed<sup>1</sup> (or disbursed) 25% of awarded funds.
- Disbursed 50% of awarded funds.
- Committed 75% of awarded funds.
- Committed 100% of awarded funds.

We reviewed 10 contracts totaling approximately \$2.4 million at seven LPAs (see Exhibit B) as well as OCR's monitoring records and found that all seven sampled LPAs missed at least one key milestone for eight of the 10 contracts. Collectively, the seven LPAs missed 25 milestones. LPAs most frequently missed the first file review setup milestone (seven instances) followed closely by missing committing or disbursing 25% of the awarded funds (six instances). As of October 2025, two LPAs (FSSY and RTNYC) missed the 100% commitment milestone by almost 3 years (1,031 days).

Although OCR Program Managers reached out to the LPAs in 22 of the 25 instances as required, the monitoring actions were ineffective, as the same LPAs that were contacted continued missing the milestone dates. For example, three LPAs (FSSY, RTNYC, and BRIDGES) missed all five milestones, despite OCR's outreach. In fact, RTNYC did not submit the first file review setup,

---

<sup>1</sup> The committed amount is based on projects that are set up and completed at the time. To calculate the committed amount, OCR officials add the amount from the project setups (cost estimates for projects that are not yet complete) or the amount from the project completion (for projects that are complete) and the total planned administrative costs for the contract.

required within the first 3 months of the contract, until 19 months into the contract—over a year after it was due. Further, as of October 2025—over 6 months past the milestone date and over 10 months into their contracts—CDCLI and UWLI had not submitted the first file review setups to OCR officials, despite serving Suffolk County, which, according to U.S. Census Bureau data, had over 13,000 disabled veterans and the largest veteran population in the State. (For more information on total veteran and disabled veteran populations by county, number of Program applicants, and amounts awarded by county by fiscal year, see the Background for a link to interactive maps available on our website.)

LPAs cannot start working on subsequent projects until the first file review setup has been approved by OCR officials. Therefore, LPAs missing milestones, particularly the first file review setup, results in veterans being unable to obtain timely assistance from the Program. The first file review setups serve as evidence that LPAs are vetting eligible veterans and projects; when this milestone is missed, OCR officials have no assurance that LPAs are adhering to Program requirements.

## **Contract Closeout**

At the end of each contract, OCR Program Managers should prepare closeout documentation and LPA officials should complete and submit a monitoring questionnaire to OCR staff for review. Based on their review of the questionnaire, an OCR Program Manager prepares a Monitoring Report indicating any findings (specific non-compliances to which the LPA must respond within 30 days), concerns (potential problems that OCR staff will closely examine during future monitoring), and recommendations.

We reviewed closeout records, including their respective Monitoring Reports, for two closed contracts—one at Arbor and one at RTSC. Although OCR approved the closeout and issued a Monitoring Report for Arbor’s contract that had no findings, we determined the contract records had missing or insufficient applicant documents. Further, the Monitoring Report for RTSC’s contract included two concerns—one regarding language in the homeowner agreement and one regarding the timeliness of submitting the first file review. However, we did not see any records indicating that OCR monitored the contract during its term or identified and addressed these issues.

The monitoring questionnaires include questions related to the LPAs’ marketing efforts; bid solicitation, project selection, and project inspection processes; proposed unit goals and actual units assisted; and impediments to reaching proposed accomplishments. Although OCR officials advised us that they review the questionnaires, without a mechanism in place for independent verification, there is no assurance that the information reported is accurate.

Reviewing compliance after the completion of projects limits OCR’s ability to address the underlying cause of non-compliance in a timely manner. OCR should consider developing and implementing more vigorous monitoring and LPA reporting procedures throughout the performance of the contract.

## Extended Contracts

According to the Law, Program contracts shall not exceed 3 years, and upon request, OCR may extend the term of the contract for up to two additional 1-year periods. In practice, however, HTFC enters into contracts with LPAs for a term of 2 years and, if additional time beyond the original contract term is needed, the LPAs must submit a formal written request to OCR and provide reasons for the extension (e.g., challenges obtaining eligibility documents from participants, difficulties securing contractors, need to obtain secondary funding sources). According to OCR's Monitoring Plan, if an extension is granted, OCR officials are required to conduct status check-ins frequently with LPAs to assess the progress.

We found that OCR officials extended four of the 10 contracts past the original term; however, OCR Program Managers do not conduct status check-ins with the LPAs after extending these contracts, as required (see the following table). Instead, OCR officials explained they review contract extension requests and generally only approve an extension for 3–6 months. They also stated that they re-evaluate LPA performance at the end of the extension term, but there are no monitoring check-ins during the extended term.

### Extended Contracts

| LPA     | Contract Start Date | Original Contract End Date | First Contract Extension End Date | Second Contract Extension End Date |
|---------|---------------------|----------------------------|-----------------------------------|------------------------------------|
| FSSY    | January 1, 2023     | December 31, 2024          | June 30, 2025                     | December 31, 2025                  |
| RTNYC   | January 1, 2023     | December 31, 2024          | June 30, 2025                     | December 31, 2025                  |
| BRIDGES | January 1, 2024     | December 31, 2025          | June 30, 2026                     | N/A                                |
| RTSC    | January 1, 2023     | December 31, 2024          | March 31, 2025                    | N/A                                |

Because of this limited monitoring activity, OCR Program Managers may not be aware of issues that LPAs are experiencing in executing the contracts and delivering needed services to veterans. We encourage OCR to take a more proactive approach and actively oversee and engage the providers throughout the full length of the contract, including the extensions.

## Project Funding Limits

Once awarded, an LPA can use a maximum of \$25,000 in Program funds per residential unit. The \$25,000 limit includes “hard costs” (e.g., direct project costs, such as labor, material, equipment) for accessibility modifications and “soft costs,” also referred to as project delivery costs (e.g., professional service costs, such as legal fees, filing fees). For fiscal years 2022 and 2023, LPAs could budget up to 10% of the total contract award in delivery costs. In addition, up to 7.5% of the total award could be budgeted for eligible administrative costs (e.g., overall marketing of the Program; insurance costs directly associated with implementing the Program;

partial allocation of rental fees associated with items such as building rent, electric, office telephone, or equipment rental bills; or salary of staff/fringe costs associated with implementing and/or monitoring the Program). In fiscal year 2024, the allowable administrative costs increased to 10% of the total award. The administrative costs are not included in individual property/project costs but are included in the contract amount.

According to OCR officials, the \$25,000 limit per residential unit was set as an agency policy based on the amount of funding available and the desire for geographic distribution. OCR officials stated that the per-project limit is maintained across all three Access programs they operate—Access to Home, Access to Home for Medicaid Members, and Access to Home for Heroes/Veterans—for clarity and consistency and continues to provide enough funding to complete larger projects while allowing for more projects to be completed overall. However, LPA officials told us it is challenging to find contractors that will complete work within the funding limit and, therefore, they must find additional sources of funding to assist participants with their needs.

According to LPA officials, the current funding limits affect the project timelines and cause delays in project start-ups and ultimately in contract execution. For example, at one LPA, a participant needed a new porch due to its deteriorating and unsafe condition. The necessary work to complete this project cost approximately \$45,000, so LPA officials had to obtain a secondary funding source to assist the disabled veteran. According to LPA officials, it took more than 1 year to find the additional necessary funding, and the disabled veteran had to live with the unsafe conditions during that period.

Furthermore, we found that OCR officials do not always ensure that projects stay within the \$25,000 limit, and they do not track project disbursements for those paid from multiple contracts. For example, OCR officials approved disbursements of over \$25,000 for a single project at RTSC. For this project, RTSC received a disbursement of \$20,784 from the 2023 contract and a disbursement of \$4,769 from the 2024 contract, for a total of \$25,553. According to OCR officials, they reconcile disbursement amounts when a contract is closed. Reviewing compliance only after the completion of all projects limits OCR's ability to identify and resolve issues timely, which may lead to the need for OCR to recapture funds from the LPAs after they have already been expended.

## **LPAs' Non-Compliance With Program Requirements**

We found that LPAs did not always comply with Program requirements. For example, LPAs did not maintain complete project files, including support for eligibility. Furthermore, LPAs did not always comply with bidding requirements, and one LPA did not implement a conflict-of-interest policy, as required.

### **Inadequate Program Documentation**

According to the Project File Checklist, LPAs must maintain several supporting documents, such as participant eligibility and construction monitoring documentation, for each project (see Exhibit A). According to the Manual, to be eligible for Program funding, an applicant must provide—and the LPA must retain—records supporting that:

- The participant is a veteran who was honorably or generally discharged and has a disability.
- A professional evaluation was conducted to establish a qualifying disability. In instances where accessibility modifications are requested, such evaluation must describe the substantial limitation caused by the disability and recommend potential structural modifications to improve the activities of daily living within and/or access to such residence in consideration of such disability.
- The participant is at or below 120% of area median income.
- The residential unit receiving assistance is the primary residence, and the participant is the primary resident.
- The participant is current on all property taxes and has homeowner's insurance.

We reviewed a sample of 23 projects at five (Arbor, BRIDGES, FSSY, RTNYC, and RTSC) of the seven sampled LPAs (CDCLI and UWLI did not have any projects started at the time of our review) and found none of the five LPAs obtained the required documentation for Program projects. We found that files for 19 of the 23 projects (approximately 83%) were either missing or contained insufficient documents necessary to support LPA compliance with Program requirements such as participant eligibility, construction monitoring, and proof of payment to the contractors. For example, we found nine project files were missing documentation of a disability as follows:

- Four project files at two LPAs (three at RTSC, one at Arbor) did not contain any documentation to support a disability and, for two of these files, the participant's application stated the veteran was not disabled.
- Four project files, at three LPAs (two at FSSY, one at RTNYC, and one at RTSC), had documentation to support that the veteran had a disability; however, the files were missing a required evaluation of the veteran's disability to describe the substantial limitation caused by the disability and to recommend potential structural modifications.
- One project file at Arbor contained appropriate documentation for the participant; however, the participant passed away before the construction began. The LPA chose to continue construction with Program funds with inadequate justification for their use, and OCR officials approved the project.

Although OCR officials reviewed four of the 19 project files through their first file review process, we saw no evidence that they identified the deficiencies or missing documentation. We also found that OCR staff engaged in monitoring activities only at the beginning of the contract and at the time of closing, rather than throughout the contract term. Additionally, the oversight and guidance provided to LPAs was not adequate or timely. For example, OCR does not require that LPAs maintain or send project status reports to OCR and has not implemented project timeline requirements. OCR should ensure that its monitoring procedures are sound and timely and LPAs are knowledgeable and understand all Program requirements.

OCR's lack of adequate and continuous monitoring of LPAs increases the likelihood of LPAs not complying with the Program requirements and projects not being engaged or completed on time while veterans with disabilities continue to live in homes with challenging and often unsafe conditions. Sufficient ongoing reviews of LPAs' performance and compliance with the Program requirements can promote timeliness in delivering Program services to disabled veterans ensuring that they live independently, comfortably, and in familiar surroundings within their communities.

## **Questionable Bidding Practices**

HCR has established bidding procedures that LPAs should follow. Specifically, according to the Manual, LPAs can either solicit bids by project or use a rotating bid list. To obtain bids by project, the LPA must issue a request for bids for each project detailing the work required and must use a clear, written scope of work. LPAs also must solicit bids from an adequate number of qualified sources to allow reasonable competition and receive at least two bids to establish the cost reasonableness consistent with the nature and requirements of the procurement. LPAs are required to select a responsible bidder with the lowest price while considering other factors, such as availability and expertise. If the LPA doesn't select the lowest bidder, it must document the reason why. When using a rotating bid list, LPAs must identify typical work scopes and prepare an internal cost estimate for each. The LPA must issue an RFP asking for sealed proposals, compare the responses to its internal cost estimate, and create the Contractor Bid List. The LPA must notify each contractor that they have been selected and advise that the LPA will award projects on a rotating basis.

We reviewed bidding documentation of five LPAs that had completed projects and found three (60%) did not comply with bidding requirements, as follows:

- FSSY officials did not select the lowest bidder for one project and did not document the reason why. Additionally, FSSY officials provided no evidence demonstrating that the selected bidder was responsible. According to FSSY officials, the selected contractor was chosen because he lives a few houses down from the participant.
- RTNYC's preparation of the scope of work and internal cost estimates appeared questionable. Prior to finalizing the scope of work and internal cost estimate, RTNYC officials conducted a walkthrough of the property with the potential bidders, adding items to the scope based on input from those potential bidders. Therefore, there is no assurance that the work specifications and costs are accurate and necessary, as the bidders could add items or inflate costs for their benefit. Additionally, we found officials manipulated the bidding process by disclosing one contractor's (lower) estimate to a second contractor with a higher estimate. Rather than selecting the contractor with the lower bid, according to an email from RTNYC staff to the second contractor, they wanted to make this project work for that specific contractor, so they requested a new bid with a specified lower amount. RTNYC officials did not explain why they wanted to select this second contractor for the work and did not provide evidence to show that the selected bidder was a responsible bidder.

- RTSC purportedly used a rotating bid list to solicit bids for their three Program contracts; however, they did not provide evidence that they rotated among the contractors on the list. In fact, according to RTSC officials, the process of awarding projects to contractors is complex and they do not always select the next contractor from their bid list for reasons such as contractors' preferences (e.g., some contractors are unable to travel for projects, some prefer smaller projects), contractors' capacity, and prior issues with a contractor's work. Consequently, we have no assurance that the LPA properly awarded projects on a rotating basis.

Due to these improper and inconsistent bidding practices, there is no assurance that the most qualified contractors were selected, that the most competitive and reasonable prices were received, and that fairness was promoted. Inappropriate bidding practices can result in the selection of unqualified contractors or inflated costs.

## **Conflicts of Interest**

According to the Manual, LPAs must have a conflict-of-interest policy and are responsible for determining if a conflict of interest may or does exist. LPA officials must report potential conflicts to OCR staff, as necessary, and obtain prior written approval from OCR to conduct business with individuals or entities if a conflict of interest, real or apparent, may be involved. Conflicts arise when the employee, officer, or agent of the grantee or sub-grantee, and any member of his/her immediate family, or an organization which employs, or is about to employ, any of the forementioned parties, has a financial or other interest in the firm selected for award.

We identified an apparent conflict of interest at RTSC, as the owner of a contracting company on the LPA's rotating bid list is the brother of an LPA official responsible for selecting contractors for each project. LPA officials did not notify OCR officials of the potential conflict of interest and did not obtain approval from OCR to conduct business with this individual.

Furthermore, we found that officials tasked with oversight of the Program at RTNYC did not know whether a conflict-of-interest policy existed; therefore, we conclude that the individuals responsible for applicant selection, bid reviews, and contractor selection are not familiar with, and may not be adhering to, a conflict-of-interest policy.

Overall, we determined that OCR officials do not continuously monitor compliance with Program requirements, including those related to contractor procurement or conflicts of interest. Conflicts of interest can result in the inappropriate selection of contractors, as individuals may prioritize personal gain over the best interests of the disabled veterans the Program serves.

## **Insufficient Promotion, Outreach, and Marketing of the Program**

OCR should promote the Program to potential applicants throughout the State and ensure that LPAs implement marketing strategies that reach a wide population of disabled veterans so they are aware of the available funding opportunities.

We found that OCR does not adequately advertise or promote the Program to potential applicants throughout the State, and, while OCR tasks LPAs with marketing the Program to

veterans, OCR does not adequately monitor LPA marketing strategies to ensure a wide population of disabled veterans is aware of the available funding opportunities.

## **Insufficient Promotion of the Program**

Consistent with the Law, the Manual states that, to the extent feasible, OCR should allocate its resources to meet housing needs and achieve a geographic distribution of funding across the State, while promoting community development policies that emphasize the needs of underserved communities.

We found that OCR's outreach efforts need improvement. From Program initiation in 2015, through December 2025, in nearly a decade, only about \$6 million (31%) of the \$19.6 million in Program funds has been expended on a total of 327 projects, averaging approximately 33 projects per year. Moreover, in the 3 fiscal years ended March 31, 2024, OCR received only 19 applications from 14 unique applicants originally proposing to serve 28 counties, containing 59% of the State's disabled veterans. During this period, OCR officials awarded 15 contracts, totaling \$3.3 million, to 12 unique LPAs serving 22 of the State's 62 counties (35%) containing 53% of the State's disabled veterans. In June 2024, over 6 months into its contract, one LPA expanded its proposed service area, adding four additional counties and resulting in a total of 26 served counties. (For more information on total veteran and disabled veteran populations by county, number of Program applicants, and amounts awarded by county by fiscal year, see the Background for a link to interactive maps available on our website.) However, at the time of our visit to this LPA, there were only two projects in its originally proposed service area and no projects in the additional counties. Further, over the 3 fiscal years, LPAs expended only \$1.2 million of the \$3.3 million awarded on 81 projects to assist disabled veterans.

Based on U.S. Census Bureau data for 2019–2023, we found that there are approximately 173,000 disabled veterans throughout the State and we identified 35 counties with either a population of over 5,000 disabled veterans or where over 30% of the veteran population has a disability. However, there were no applicants for the Program from 19 of these 35 counties, which account for 28% of the State's total disabled veteran population. (For more information on total veteran and disabled veteran populations by county, number of Program applicants, and amounts awarded by county by fiscal year, see the Background for a link to interactive maps available on our website.) OCR officials do not conduct research to identify areas with a high concentration of veterans and areas that need assistance.

In addition, we reached out to local officials, including county veteran service directors, county clerks and treasurers, and town supervisors, from 11 municipalities with a high population of veterans to determine if they were aware of the Program. Officials from seven municipalities told us they were unaware of the Program, and four further stated they were interested in obtaining additional information. OCR officials told us that at least two of these seven officials should have been aware of the Program, as one was included in OCR's email communications and another exchanged emails and met with OCR's Program Director in 2023.

Despite the low number of applicants for the Program, OCR officials believe their outreach is sufficient and claim the reasons for the low number of applicants include factors such as the

COVID-19 pandemic, the originally more restrictive definition of eligible veterans, lack of applicant interest in the Program, difficulty in locating eligible veterans, and the narrow eligibility requirements for the Program (compared to HCR's Access to Home Program, which assists all individuals with disabilities, including veterans). Nevertheless, we maintain that there are still ways for OCR to improve its outreach efforts and ultimately increase assistance to disabled veterans throughout the State. We recommend OCR officials, in addition to their current marketing and outreach efforts, explore and use as necessary available marketing tools and strategies as well as publicly available data sources to ensure that potential applicants, disabled veterans, and other stakeholders are sufficiently aware and take advantage of the available funding opportunities.

### **Inadequate LPA Outreach and Marketing**

According to OCR's Application Instructions, during the application process, LPAs must submit a plan for Program marketing and outreach. Further, both the Manual and the contract terms require the awarded LPAs to conduct outreach in their respective service areas to make potential stakeholders, including disabled veterans, aware of the Program opportunities. According to OCR officials, they expect LPAs to develop and distribute informational materials through traditional media, such as print advertisements and email, as well as via online resources (e.g., social media, websites). OCR requires the LPAs to maintain all documents demonstrating such outreach activities.

We reviewed the marketing plans from the 12 awarded LPAs' applications, which indicated they would promote the Program by engaging in a wide range of activities, including holding presentations; distributing program flyers; attending community events and speaking with residents; advertising through local television, radio stations, and newspapers; posting on social media and their own websites; and building community partnerships. However, we found the LPAs did not adequately market the Program. Specifically, nine applicants that submitted comprehensive marketing plans indicated that they would post on social media and/or on their websites; however, we found only two of these LPAs followed their plans.

Moreover, we found that officials at FSSY missed the opportunity to advertise the Program when a television network featured a disabled veteran and his renovated residence in a Veteran's Day episode. The veteran's residence was renovated partially with Program funds. Although FSSY was mentioned during the episode, there was no mention of the Program. OCR officials stated that they did not attend the filming of the segment because they were never informed; however, OCR officials are responsible for administrative oversight of LPAs, including LPAs' marketing efforts, and, therefore, should have been aware of the news segment.

In another case, we found that RTNYC disseminated incorrect eligibility information, such as the incorrect income limit, on its promotional flyer. RTNYC had not initiated any projects even though 18 months had passed since it was awarded the contract. OCR officials conducted a visit to this LPA; however, they explained that the visit did not consist of a formal file review and, therefore, did not identify or communicate the issues with the flyer to LPA officials.

We attribute the LPAs' lack of marketing and promotional activities to OCR's poor monitoring of LPA implementation of marketing plans. Strong marketing is essential in disseminating the Program opportunities to a wider population of disabled veterans who may not otherwise be aware of the available funding opportunities. We encourage OCR to establish stronger oversight over LPA implementation of the plans and to proactively work with the LPAs to ensure that more vigorous and effective promotional activities are developed and implemented.

## **Recommendations**

1. Improve monitoring of LPAs throughout the term of the contracts, including:
  - Increasing frequency and quality of site visits to and desk reviews of LPAs to provide needed assistance and to ensure awarded funds are used promptly to assist disabled veterans.
  - Regularly reviewing project files to ensure compliance with Program requirements, including those related to participant eligibility, contractor procurement, and conflicts of interest.
  - Adequately reviewing each LPA's marketing and outreach efforts and ensuring LPAs adhere to their marketing plans, as well as working with LPAs to identify effective marketing and outreach strategies and opportunities.
2. Implement project timeline requirements to ensure Program projects are completed within a reasonable time frame.
3. Track disbursements for each project and ensure disbursements do not exceed the approved per-project amount.
4. Provide ongoing guidance to LPA officials throughout the course of the contract terms to ensure all LPA officials understand all Program requirements.
5. Develop and implement effective marketing and outreach strategies, including conducting research and analysis to identify areas with a high concentration of disabled veterans and targeting outreach to municipality officials and veteran groups, to promote the Program.

# Audit Objective, Scope, and Methodology

---

The objective of our audit was to determine whether HCR and LPAs properly administer the New York Access to Home for Heroes/Veterans Program in accordance with program requirements. The audit covered the period April 2022 through December 2025.

To accomplish our objective and assess related internal controls, we reviewed the Law and OCR's policies and procedures, including the Manual, RFAs, Application Scoring Instructions and Guide, Project File Checklist, and Monitoring and Closeout Procedures. We met with OCR officials to obtain an understanding of the selection of LPAs and administration of the Program. We also interviewed officials from LPAs that received awards from OCR.

We used a non-statistical sampling approach to provide conclusions on our audit objectives and to test internal controls and compliance. We selected judgmental and random samples. However, because we used a non-statistical sampling approach for our tests, we cannot project the results to the respective populations. Our samples, which are discussed in detail in the body of our report, include:

- A judgmental sample of seven of 12 LPAs based on various factors including the award amount, proposed service area, amount disbursed, and status of the contract to test for compliance with Program requirements.
- A judgmental sample of 10 of 15 contracts based on various factors including the award amount, proposed service area, amount disbursed, and status of the contract to test for compliance with Program requirements.
- A judgmental sample of 23 of 61 projects at five of the seven LPAs based on the number of projects started by each LPA, total cost of the project, and scope of work to test for compliance with Program requirements.
- Random samples totaling 300 email addresses (based on a 10% selection of each year category) of 3,004 email addresses to assess the adequacy of OCR's marketing for the Program.

We obtained data from OCR email distribution lists and OCR's Microsoft Access LPA Scoring Database and assessed the reliability of that data by reviewing existing data, interviewing officials knowledgeable about the system, and tracing data to and from source documents. We determined that the data used was sufficiently reliable for the purposes of this report. Certain other data in our report was used to provide background information. Data that we used for this purpose was obtained from the best available sources, which were identified in the report. Generally accepted government auditing standards do not require us to complete a data reliability assessment for data used for this purpose. We relied on data obtained from the U.S. Census Bureau, which is recognized as an appropriate source, and used this data for widely accepted purposes. Therefore, this data is sufficiently reliable for the purposes of this report without requiring additional testing.

As part of audit procedures, the audit team used data visualization software to enhance understanding of our report (see our interactive maps linked in the Background).

# Statutory Requirements

---

## Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 and Article X, Section 5 of the State Constitution; Article II, Section 8 of the State Finance Law; and Section 2803 of the Public Authorities Law.

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

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. These duties could be considered management functions for the purposes of evaluating organizational independence under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent performance audit of HCR's oversight and administration of the Access to Home for Heroes/Veterans Program.

## Reporting Requirements

We provided a draft copy of this report to HCR officials for their review and formal comment. Their comments were considered in preparing this final report and are attached in their entirety at the end of it. In their response, HCR officials generally agreed with most of the report's recommendations and indicated actions they have taken or will take to implement them. Our responses to certain HCR comments are embedded within HCR's response as State Comptroller's Comments.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of New York State Homes and Community Renewal shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

# Exhibit A

## Program Project File Checklist

| Access to Home Program Project File Checklist        |            |            |  |
|------------------------------------------------------|------------|------------|--|
| SHARS ID                                             |            |            |  |
| LPA Name                                             |            |            |  |
| Date                                                 |            |            |  |
| Project Address                                      |            |            |  |
| Name                                                 |            |            |  |
| Type of Modification                                 |            |            |  |
| Cost                                                 |            |            |  |
| Start Date                                           |            |            |  |
| End Date                                             |            |            |  |
|                                                      |            | Comments   |  |
| <b>SET UP</b>                                        | <b>LPA</b> | <b>OCR</b> |  |
| Homeowner/Participant Application                    |            |            |  |
| Verification of Primary Residence                    |            |            |  |
| Documentation of Disability                          |            |            |  |
| Household Size (number of persons)                   |            |            |  |
| Proof of Income Eligibility                          |            |            |  |
| Verification of Current Homeowner's Insurance        |            |            |  |
| Verification Current on all Property Taxes           |            |            |  |
| Documentation of Veteran Status                      |            |            |  |
| Award Letter from LPA to Participant                 |            |            |  |
| Scope of Work                                        |            |            |  |
| Cost Estimate                                        |            |            |  |
| Signed Homeowner/Participant Agreement               |            |            |  |
| Pre-Construction Inspection                          |            |            |  |
| Before Photo of Front Elevation of Home              |            |            |  |
| Before Photo of Repairs to be Completed              |            |            |  |
| Project Set Up Form with Environmental Certification |            |            |  |
| <b>COMPLETION</b>                                    | <b>LPA</b> | <b>OCR</b> |  |
| Contractor Procurement Documentation                 |            |            |  |
| Certificate of Contractor Insurance                  |            |            |  |
| Lead EPA Certification                               |            |            |  |
| Signed Participant and Contractor Agreement          |            |            |  |
| Building Permits or Proof no Permit Needed           |            |            |  |
| Notice to Proceed                                    |            |            |  |
| Change Orders (if applicable)                        |            |            |  |
| Contractor Waiver of Liens                           |            |            |  |
| MWBE Contractor Bid Solicitation Log                 |            |            |  |
| Affirmation of Income Payment (if applicable)        |            |            |  |
| Record of Construction Monitoring                    |            |            |  |
| Certificate of Final Inspection                      |            |            |  |
| Project Completion Form                              |            |            |  |
| After Photos of Completed Repairs & Front Elevation  |            |            |  |
| Signed Property Maintenance Declaration              |            |            |  |
| Copy of Recipient Sign-off of Completed Work         |            |            |  |
| Contractor Invoice(s)/Vouchers                       |            |            |  |
| Final Disbursement Documentation                     |            |            |  |

# Exhibit B

## Sampled Contracts and LPAs

| Contract Year                  | LPA                                               | Proposed Service Area/Areas                                     | Contract Amount | Original Contract Term                  | Updated Term End  | Number of Proposed Projects | Number of Approved Setups |
|--------------------------------|---------------------------------------------------|-----------------------------------------------------------------|-----------------|-----------------------------------------|-------------------|-----------------------------|---------------------------|
| 2022                           | Arbor Housing & Development                       | Chemung, Schuyler, and Steuben                                  | \$100,000       | January 1, 2023–December 31, 2024       | Closed            | 6                           | 5                         |
| 2023                           | Arbor Housing & Development                       | Chemung, Schuyler, and Steuben                                  | \$100,000       | January 1, 2024–December 31, 2025       | December 31, 2025 | 6                           | 4                         |
| 2023                           | Rockland Independent Living Center d.b.a. BRIDGES | Columbia, Dutchess, Orange, Rockland, Sullivan, and Westchester | \$300,000       | January 1, 2024–December 31, 2025       | June 30, 2026     | 10                          | 3                         |
| 2022                           | Family Service Society of Yonkers                 | Westchester                                                     | \$300,000       | January 1, 2023–December 31, 2024       | December 31, 2025 | 12                          | 6                         |
| 2022                           | Rebuilding Together NYC                           | Bronx, Kings, New York, Queens, and Richmond                    | \$240,000       | January 1, 2023–December 31, 2024       | December 31, 2025 | 10                          | 2                         |
| 2022                           | Rebuilding Together Saratoga County               | Montgomery, Saratoga, Warren, and Washington                    | \$300,000       | January 1, 2023–December 31, 2024       | Closed            | 15                          | 17                        |
| 2023                           | Rebuilding Together Saratoga County               | Montgomery, Saratoga, Warren, and Washington                    | \$300,000       | January 1, 2024–December 31, 2025       | Closed            | 15                          | 17                        |
| 2024                           | Rebuilding Together Saratoga County               | Saratoga, Warren, and Washington                                | \$300,000       | January 1, 2025–December 31, 2026       | December 31, 2026 | 15                          | 13                        |
| 2024                           | United Way of Long Island                         | Suffolk                                                         | \$150,000       | January 1, 2025–December 31, 2026       | December 31, 2026 | 10                          | 0                         |
| 2024                           | Community Development Corporation of Long Island  | Nassau and Suffolk                                              | \$300,000       | January 1, 2025–December 31, 2026       | December 31, 2026 | 18                          | 0                         |
| Total Awarded to Sampled LPAs: |                                                   |                                                                 | \$2.39M         | Total Projects Started by Sampled LPAs: |                   |                             | 67                        |

### Notes:

- Awarded LPAs proposed to serve a total of 26 counties. Exhibit B shows only the sampled contracts. There were five additional awarded contracts that proposed to serve Chautauqua, Clinton, Fulton, Herkimer, Jefferson, and Oneida counties.
- The number of approved setups in Exhibit B is as of October 2025.
- At the time of the 2023 contract award, Rockland Independent Living Center d.b.a. BRIDGES only proposed to service Rockland County, and it subsequently added five additional counties to its proposed service area.

# HCR Response and State Comptroller's Comments

---



**Homes and  
Community Renewal**

**KATHY HOCHUL**

Governor

**RUTHANNE VISNAUSKAS**

Commissioner

May 4, 2026

Kendrick Sifontes  
Audit Director, Division of State Government Accountability  
Office of the State Comptroller  
59 Maiden Lane  
New York, NY 10038

Re: Report 2025-S-10, Housing Trust Fund Corporation: Oversight of the  
Access to Home for Heroes/Veterans Program

Mr. Sifontes:

New York State Homes and Community Renewal ("HCR" or "Agency") appreciates the opportunity to respond to the above-referenced draft audit report and thanks the Comptroller's staff for their professionalism and courtesy throughout the audit process.

HCR's Office of Community Renewal ("OCR") administers the Access to Home for Heroes program to enable veterans with disabilities to live safely and comfortably at home by assisting with the cost of accessibility modifications and habitability repairs. This assistance has enabled hundreds of veterans to continue to live independently in their homes.

HCR works continually to refine and improve its systems and procedures. It is HCR's goal to facilitate the efficient delivery of the Access to Home for Heroes program funds to all veterans in need throughout New York State.

## **Recommendation 1:**

Improve monitoring of LPAs throughout the term of the contracts, including: increasing frequency and quality of site visits to and desk reviews of LPAs to provide needed assistance and to ensure awarded funds are used promptly to assist disabled veterans; regularly reviewing project files to ensure compliance with Program requirements, including those related to participant eligibility, contractor procurement, and conflicts of interest; and adequately reviewing each LPA's marketing and outreach efforts and ensuring LPAs adhere to their marketing plans, as well as working with LPAs to identify effective marketing and outreach strategies and opportunities.

**Agency Response:**

A new monitoring system has been developed and launched for the 2025 Local Program Administrator (“LPA”) contracts. The new system includes enhanced first file reviews with updated instructions, quarterly LPA reporting, updated closeout materials, and a final survey. The enhanced first file review process includes reviewing contractor procurement policies and procedures, conflict of interest policies, and explicit eligibility materials. LPAs will be expected to report on marketing and outreach efforts as part of first file review and will be evaluated on contract progress through quarterly reporting. Desk reviews and site visits will be conducted in support of grant administration as needed or requested as provisions of technical assistance.

OCR implemented a new conflict of interest policy in the fall of 2025. Program materials were updated to include this policy. Materials have been streamlined to provide LPAs with a simple form to disclose and submit potential conflicts for review. Currently OCR management works with staff to request additional information if required, obtain guidance from the Office of Legal Affairs if applicable, and render determinations regarding conflict of interest. OCR staff have access to all policies and procedures and have been trained in the new process.

**Recommendation 2:**

Implement project timeline requirements to ensure Program projects are completed within a reasonable time frame.

**Agency Response:**

The monitoring plan containing project timelines was designed to provide LPAs with production expectations and OCR staff with a framework for conducting production review outside daily grant administration activities. This schedule was not intended to be used as a tool for determining noncompliance for the LPAs as suggested in the report. Every effort was made by project managers to conduct outreach in accordance with the plans which were provided in connection with the audit. The monitoring plan instructs project managers to conduct phone calls with LPA staff to provide technical assistance related to timeliness for organizations not compliant with production goals. Quarterly Reporting will provide additional information to project managers for units in the LPA pipeline.

**State Comptroller’s Comment** – This recommendation does not suggest that OCR’s current Monitoring Plan (Plan) and expected milestones be used as tools for determining LPA non-compliance. Rather, we recommend that OCR develop and implement timeline requirements for each approved project to supplement the Plan’s schedule and enhance monitoring in order to improve service delivery. For instance, after approval of the first file review project setup documents, it may be beneficial to implement time frame requirements for key project milestones such as timelines for contractor selection, project commencement, and final inspection to ensure projects are completed timely.

**Recommendation 3:**

Track disbursements for each project and ensure disbursements do not exceed the approved per project amount.

**Agency Response:**

OCR acknowledges that a project spanning two separate Access to Home for Heroes contracts was disbursed more than the per project limit. OCR was able to correct the overage disbursed on this project and has since ended the practice of allowing an LPA to use two contracts to complete one project to ensure project cap compliance.

**Recommendation 4:**

Provide ongoing guidance to LPA officials throughout the course of the contract terms to ensure all LPA officials understand all Program requirements

**Agency Response:**

OCR already provides ongoing guidance to LPA officials throughout the period of performance through contract execution and implementation webinars, program manuals, routine communication and outreach, forms, instructions, and guidance updates through emails and Webex.

OCR also conducted a four-part webinar series in February of 2026. Topics covered during the webinar series were grouped by activity to highlight project set up and first file review, environmental review, disbursement, and liens and subordination.

**State Comptroller's Comment** – Given the deficiencies noted in our report regarding LPAs' continued non-compliance with Program requirements, we maintain that OCR's guidance throughout the contract terms was insufficient. While we acknowledge OCR's current efforts (such as the four-part webinar series) that began after the end of our audit scope, we encourage OCR officials to continue to provide ongoing guidance to LPA officials to ensure compliance with Program requirements.

In addition, OCR has initiated a quarterly reporting process for LPAs. Quarterly reporting will provide LPAs and OCR project managers with more frequent opportunities for connection and guidance so that deficiencies and issues can be identified and resolved earlier in the process.

**Recommendation 5:**

Develop and implement effective marketing and outreach strategies, including conducting research and analysis to identify areas with a high concentration of disabled veterans and targeting outreach to municipality officials and veteran groups to promote the Program.

**Agency Response:**

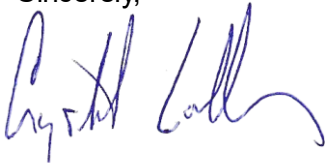
OCR already conducts robust outreach to prospective applicants, including marketing emails to more than a thousand municipal officials each year, annual presentations for the New York State Association of Towns, New York State Association of Counties, New York Conference of Mayors, Rural and Neighborhood Preservation Conferences as well as annual NOFA published in the State Register. OCR staff have conducted stakeholder outreach at tabling events, conducted presentations for the New York State Division of Veterans Affairs, and a lunch and learn presentation for Office of the Aging County Directors. Marketing materials include handouts and brochures made available at events across the State and information published in the Department of State Division of Community Services CSBG newsletter. Active

grants are updated quarterly and listed by county on the HCR website for participants and case workers to find local services. OCR will continue exploring means to further promote current awards and encourage future applicants.

**State Comptroller's Comment** – Given the low application rate and LPAs' lack of marketing and promotional activities, OCR's existing promotion, outreach, and marketing strategies appear ineffective in identifying areas with a high concentration of disabled veterans and targeting municipalities and veteran groups so that they are aware of the available funding opportunities. As noted in our report, we maintain there are still opportunities for OCR to improve its outreach efforts and ultimately increase assistance to disabled veterans throughout the State. We recommend OCR officials, in addition to their current marketing and outreach efforts, explore and use, as necessary, available marketing tools and strategies as well as publicly available data sources to ensure that potential applicants, disabled veterans, and other stakeholders are sufficiently aware and take advantage of available funding opportunities.

Please contact Sean Fitzgerald, Office of Internal Audit, at (518) 473-3112 if you have any questions or require anything further.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Crystal Loffler', with a stylized, cursive script.

Crystal Loffler

Deputy Commissioner, Office of Community Renewal

CC: RuthAnne Visnauskas  
Betsy R.C. Mallow  
Will Martin  
Sean Fitzgerald



## Contact

Office of the New York State Comptroller  
110 State Street  
Albany, New York 12236

(518) 474-4044

[www.osc.ny.gov](http://www.osc.ny.gov)

Prepared by the Division of State Government Accountability

## Executive Team

Andrea C. Miller – Executive Deputy Comptroller  
Tina Kim – Deputy Comptroller  
Stephen C. Lynch – Assistant Comptroller

## Audit Team

Kenrick Sifontes – Audit Director  
Diane Gustard – Audit Manager  
Dmitri Vassiliev, CPA – Audit Supervisor  
Leanna Dillon – Examiner-in-Charge  
Keisha Sprott – Staff Examiner  
Sean Sadowski – Staff Examiner  
Arianna Reiher – Mapping Analyst  
Rachel Moore – Senior Editor  
Alanna Thompson – Student Intern



FOLLOW US: [osc.ny.gov/subscribe](http://osc.ny.gov/subscribe)