

**OFFICE OF INSPECTOR GENERAL** | U.S. Department of Housing and Urban Development

# SEMIANNUAL REPORT TO CONGRESS

FOR THE PERIOD April 1, 2023, to September 30, 2023









# Message from the Inspector General

I am proud to submit the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) Semiannual Report to Congress (SAR) for the period April 1, 2023, through September 30, 2023. Previously, I highlighted our continued focus on oversight related to protecting our communities from <a href="harmful health and safety hazards">harmful health and safety hazards</a> and preventing and addressing <a href="mailto:sexual misconduct">sexual misconduct</a> in HUD-assisted housing to protect our communities from sexual predators who threaten their safety. In June 2023, I was honored to <a href="mailto:testify">testify</a> about these priorities and our oversight portfolio before the House Committee on Financial Services, Subcommittee on Housing and Insurance.

During the last 6 months, we have continued our outreach efforts with our law enforcement partners and United States Attorneys' Offices across the Nation to find new ways to engage through listening sessions and community events with stakeholders. In September, I was pleased to cohost a safe housing community outreach event with the United States Attorney for the Eastern District of Pennsylvania, focused on promoting the health and safety of tenants living in HUD-assisted housing. We believe that through future community-level engagement with a range of stakeholders, we can make meaningful changes for the families that HUD serves.

Beyond these key priority areas, we use our audits, evaluations, and investigations to highlight the need for robust grant oversight and fraud risk management at HUD to combat financial fraud schemes specifically targeted toward HUD beneficiaries whose circumstances make them especially vulnerable. The results of these efforts are highlighted in <u>press releases</u>, <u>videos</u>, <u>fraud bulletins</u>, and <u>newsletters</u> throughout this report. In addition, we have engaged in increased oversight related to the operations and resources of the Government National Mortgage Association, including its <u>Crisis Readiness Program</u> and <u>Guidance and Process for Troubled Issuers</u>.

During this semiannual period, OIG audits found more than \$32 million in funds that could be put to better use and more than \$4 million in questioned costs and recovered more than \$38 million in collections. In addition, OIG investigations resulted in 49 criminal convictions, 13 civil actions, and 6 governmentwide suspension and debarment actions, as well as more than \$36.5 million in restitution and judgments, with more than \$9.8 million in total recoveries and receivables going to HUD programs. Further, through our investigative portfolio, we have held bad actors accountable for multiple fraud schemes, including recently resolved cases involving <a href="mailto:embezzlement">embezzlement</a>, <a href="mailto:public corruption">public corruption</a>, <a href="mailto:mortgage fraud">mortgage fraud</a>, and <a href="mailto:landlordsexual misconduct">landlordsexual misconduct</a>. We continue to dedicate investigative resources to hold HUD landlords



and property managers accountable for violating key health and safety requirements that put HUD's beneficiaries at risk.

Many of our investigations rely on the courage of whistleblowers who come forward to share concerns about fraud, waste, and abuse. Whistleblowers play a critical role in keeping HUD programs honest, efficient, and accountable. While conducting whistleblower investigations involving contractor employees, we learned that thousands of contractor employees are not protected against retaliation for blowing the whistle because the contracts at issue predated the passage of the statute giving rise to whistleblower protections. We issued a <u>management alert</u> that included five recommendations to HUD on additional steps it should take to protect contractor employees who disclose wrongdoing from retaliation.

We continue to maximize transparency of OIG recommendations by tracking their status on our <u>Recommendations Dashboard</u>. We also continue to work with HUD to pursue resolution of OIG recommendations from prior audits and evaluations that maximize efficiency in its operations and protect its programs from fraud, waste, and abuse.

Last year we produced HUD OIG's first list of <u>priority open recommendations</u> that, if addressed, would have the greatest impact on HUD's programs and the communities it serves. During this reporting period, I am pleased to share that HUD closed four of those priority recommendations related to (1) ensuring adequate flood insurance in Federal Housing Administration-insured properties, (2) the development of policies and procedures for monitoring expenditures related to slow-spending grantees, (3) appropriately determining properties exempt from the Lead Safe Housing Rule, and (4) identifying children under 6 who live in those properties and taking appropriate actions to protect them.

We appreciate the progress that HUD has made, as well as the continued commitment of our colleagues at HUD, who devote themselves to addressing the critical housing needs of communities across our Nation. We also appreciate the support of our congressional stakeholders and the public, who trust the integrity of our work and support our mission of helping HUD succeed through taxpayer-funded resources. Finally, I want to thank our team of HUD OIG employees across the Nation for their dedication and hard work. Together, their oversight is helping to improve HUD's programs, protect its beneficiaries, and ensure that taxpayer funds to support housing are being spent as intended.

Rae Oliver Davis

Kae Olivis Pravis Inspector General



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# **Highlights**

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\$32,144,945
RECOMMENDED
FUNDS PUT TO
BETTER USE



217 SUBPOENAS



\$4,190,942

QUESTIONED



49

CONVICTIONS-PLEAS-PRETRIAL DIVERSIONS



\$38,180,110

COLLECTIONS FROM AUDITS



56

INDICTMENTS AND INFORMATIONS



\$36,513,130 TOTAL RESTITUTION AND JUDGMENTS



13

CIVIL ACTIONS



\$9,811,840

TOTAL RECOVERIES-RECEIVABLES TO HUD PROGRAMS



18

TOTAL ADMINISTRATIVE SANCTIONS



# **Profile of Performance**

#### For the Period April 1, 2023, to September 30, 2023

Audit results <sup>1</sup>	This reporting period	Fiscal year 2023
Recommended funds put to better use	\$32,144,945	\$982,230,279
Questioned costs	\$4,190,942	\$4,887,886
Collections from audits	\$38,180,110	\$86,769,532

Investigative results <sup>2</sup>	This reporting period	Fiscal year 2023
Total restitution and judgments	\$36,513,130	\$63,587,476
Total recoveries and receivables to HUD programs	\$9,811,840	\$14,630,606
Arrests	32	76
Indictments and informations	56	125
Convictions, pleas, and pretrial diversions	49	104
Civil actions	13	19
Total administrative sanctions	18	42
Suspensions	3	9
Debarments	3	10
Program or professional license or certification	0	2
Evictions	2	4
Other <sup>3</sup>	10	17
Search warrants	10	67
Subpoenas	204	413
Total administrative referrals	55	108
Suspensions referred	15	35
Debarments referred	40	73

<sup>&</sup>lt;sup>1</sup> During this semiannual period, the Office of Inspector General's (OIG) audits did not result in administrative actions, civil actions, or personnel actions. Therefore, we did not include those categories under audit results in this Profile of Performance.

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<sup>&</sup>lt;sup>2</sup> Delays can occur in recording restitutions, judgments, recoveries, and receivables obtained during a semiannual reporting period. These figures are accurate as of the time of publication.

<sup>&</sup>lt;sup>3</sup> Includes employee actions (reprimands, suspensions, demotions, or terminations of the employees of Federal, State, or local governments or of Federal contractors and grantees as the result of OIG activities), limited denials of participation, and indemnifications.

<sup>\*</sup>Following the issuance of SAR 90, OIG identified a recommended restitution of \$69,853,850 that was incorrectly reported as final in the FY 23 totals. Accordingly, the FY 2023 totals have been revised. Consistent with OIG practice the pending restitution will be reported in a future semiannual report upon approval by the cognizant U.S. District Court.





## **Making an Impact**

# **Protecting Communities Through Outreach and Stakeholder Engagement**

Beyond its audits, investigations, and evaluations, the Office of Inspector General (OIG) continues to engage in significant outreach, to include multiple listening sessions, with the U.S. Department of Housing and Urban Development (HUD), Congress, industry stakeholders, and its law enforcement partners to maximize transparency around its oversight portfolio and to protect HUD's programs and beneficiaries. On June 9, 2023, the Inspector General addressed the Attorney General Advisory Committee's Subcommittees for Environmental Justice and Civil Rights on HUD OIG priorities around environmental hazards and unsafe living conditions, as well as sexual misconduct in housing.

Below are some highlights:

# **Community Outreach: Promoting Health and Safety in HUD- Assisted Housing**

On September 29, 2023, U.S. Attorney
Jacqueline Romero of the Eastern District of
Pennsylvania and HUD Inspector General Rae
Oliver Davis hosted a Safe Housing outreach
event focused on promoting the health and
safety of tenants residing in HUD-assisted
housing. The event, which took place at the U.S.
Attorney's Office in Philadelphia, comprised a
two-part discussion on eliminating
environmental hazards and combatting sexual
misconduct in HUD-assisted housing. Read the
press release.



#### **Community Outreach: Federal & Tribal Regional Summit**

In July 2023, HUD OIG was pleased to join U.S. Attorney Vanessa R. Waldref, Eastern District of Washington, for the Federal & Tribal Regional Summit in Spokane, WA, alongside cohosts from the U.S. Department of Justice's Environmental and Natural Resources Division, the Office of Environmental



Justice, and the Office of Tribal Justice. HUD OIG provided an overview of its environmental justice initiative, focused on impactful oversight and investigative work that promotes the health and safety of HUD's beneficiaries.



#### **Oversight Hearing**

On June 21, 2023, Inspector General Rae Oliver Davis testified before the House Financial Services Committee, Subcommittee on Housing and Insurance, during a hearing entitled "HUD Oversight: Testimony of the HUD Inspector General." During the hearing, Inspector General Oliver Davis discussed HUD OIG's recent work and ongoing audits and evaluations and outlined priority areas in which HUD action is needed. The testimony also addressed the top management challenges that HUD faces in delivering housing and community development services to the communities and individuals that rely on HUD programs.



Watch: Oversight Hearing - Department of Housing and Urban Development

#### Management Alert: HUD Should Take Additional Steps To Protect Contractor Employees Who Disclose Wrongdoing

On May 31, 2023, Inspector General Rae Oliver Davis issued a <u>management alert</u> recommending that HUD be proactive in addressing the substantial gap in protections for potential contractor employees who blow the whistle on wrongdoing. As a result of several recent investigations, HUD OIG learned that employees of thousands of contractors that receive funds from HUD may not be protected against retaliation for whistleblowing due to gaps in protections for contracts that predate July 1, 2013, the date on which the antiretaliation law codified at 41 U.S.C. (United States Code) 4712 (Section 4712) became effective. These gaps in the retaliation protections exist because HUD has not modified thousands of its contracts to include Section 4712 antiretaliation provisions that would protect the employees.



Read: <u>Statement of Inspector General Rae Oliver Davis on HUD OIG's Management Alert: HUD</u> Should Take Additional Steps To Protect Contractor Employees Who Disclose Wrongdoing

Whistleblowers perform an important service to the public and the government when they report evidence of waste, fraud, abuse, and gross mismanagement. HUD OIG is committed to working with whistleblowers to provide maximum protections available under the law.

For more information and resources, please see below:



Watch: National Whistleblower Day 2023



Read: <u>HUD Contractor & Grantee Whistleblowing</u>



#### Joint Oversight with the Pandemic Response Accountability Committee

As part of a joint effort led by the Pandemic Response Accountability Committee, HUD OIG, along with nine other OIGs, identified and evaluated pandemic-related funding to six selected communities, which included two small to medium-size cities, two rural counties, and two Native American reservations, to determine how much pandemic relief they received. In its related report, <a href="Tracking Pandemic Relief">Tracking Pandemic Relief</a>
Funds that Went to Local Communities Reveals Persistent Data Gaps and Data Reliability Issues, the team determined that \$2.65 billion in pandemic relief funding was received by the six communities from 10 Federal agencies, including HUD, and the analysis was complicated and time consuming. Tracking the funding to the community level required access to several data systems, and complete data were either unavailable or insufficient. These challenges highlighted the limits on the degree of transparency in the use of the pandemic relief funds. Upcoming phases of this project, which include field visits to the communities identified, will provide more insight into how the funding was used and whether the funding helped the communities as intended.

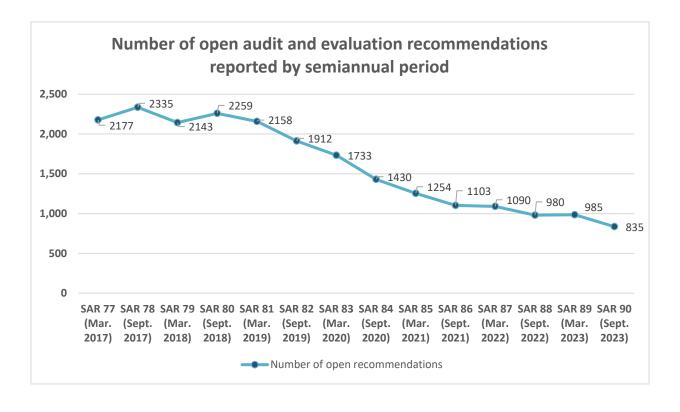
#### **Resolution of Open Recommendations**

OIG continues to work with HUD toward resolving open recommendations from OIG's audit and evaluation reports, focusing on <u>priority open recommendations</u> and strategies to resolve groups of recommendations with commonalities. During this semiannual period, HUD closed 229 open recommendations from prior audits and evaluations, to include 4 that were designated as priority open recommendations, as highlighted throughout this report.

One significant accomplishment from the strategic approach of resolving recommendations with commonalities is consensus on closing recommendations that involve repayment agreements HUD has with auditees. Many of these agreements have terms that extend for several years or even decades. Historically, these recommendations remained open until the auditee satisfied repayment or HUD otherwise resolved the debt. HUD and HUD OIG agreed to close recommendations if auditees had complied with the terms of the repayment agreements and were current on the debts at the time of closure. As part of the consensus, HUD will continue to track repayments still-owed, while HUD and HUD OIG monitor auditees' repayment progress. As of September 30, 2023, HUD had closed 68 such recommendations and continues to evaluate an additional 111 open recommendations that may also meet the closure criteria.



This collaborative approach has resulted in a significant reduction in open recommendations over time, as demonstrated in the chart below.





# Oversight Focused on HUD's Top Management Challenges

As in our last Semiannual Report to Congress (SAR), we have aligned our reporting during this semiannual period with our 2023 Top Management Challenges report, under the following sections:

- Ensuring access to and availability of affordable housing
- Mitigating counterparty risks in mortgage programs
- Eliminating hazards in HUD-assisted housing
- Improving information technology (IT) modernization and cybersecurity
- Administering disaster recovery and grants management
- Sustaining progress in financial management
- · Fraud risk management

In each section, we include our reports issued, investigations completed, and outreach carried out during this semiannual period, as well as any new oversight reports started during this period, to help HUD meet its top management challenges. Additional ongoing work announced during prior semiannual periods addressing all of HUD's top management challenges can be found on <u>our website</u>. We also share progress made by HUD in resolving HUD OIG priority open recommendations.







# **Ensuring Access to and Availability of Affordable Housing**

The Housing Choice Voucher (HCV) Program provides housing assistance for approximately 2.3 million families, including the elderly and persons with disabilities. In fiscal year 2023, HUD received more than \$30 billion from Congress for the HCV Program to help low-income families afford decent, safe, and sanitary housing in the private market. As of November 2020, more than 300,000 HUD housing choice vouchers were unused. When vouchers are not used, they become unfunded, and each of these equates to a low-income family's not being housed.

#### **Related Investigation**

Justice Department Secures \$400,000 in Sexual Harassment Lawsuit Against Connecticut Landlord

A former HCV Program landlord entered into a consent decree with the United States in U.S. District Court for the District of Connecticut to resolve allegations that he violated the Fair Housing Act by sexually harassing female tenants and housing applicants. The consent decree also resolved claims against the properties where the alleged harassment occurred. Between 2011 and 2017, the former HCV Program landlord housed 14 housing assistance payments tenants, while receiving approximately \$382,412 in payments. The former landlord agreed to pay a \$350,000 settlement, which will be divided among the aggrieved parties as monetary damages, and a \$50,000 civil penalty to the United States.



#### New and Ongoing Related Oversight

Multifamily Mortgage Application Processing Delays, announced April 2023

HUD-Held Vacant Loan Sales
Controls for Mission-Driven
Entities, announced April 2023

HUD and CoC Collection and Use of Homelessness Data To Assess Performance, announced May 2023





## Mitigating Counterparty Risks in Mortgage Programs

HUD's mission includes supporting sustainable homeownership and encouraging investment in affordable rental housing.

The Federal Housing Administration (FHA) administers HUD insurance programs, and the Government National Mortgage Association (Ginnie Mae) administers the guarantee of government-insured mortgage-backed securities.

Through FHA and Ginnie Mae, HUD employs a two-pronged approach to accomplishing this mission:

- by insuring mortgage loans that lenders provide to traditionally underserved home buyers and to owners of various affordable rental housing and
- by guaranteeing payments to investors who purchase securities collateralized by government-insured loans, providing liquidity in the market.

FHA and Ginnie Mae must work with outside entities, including property owners, banks, nonbank lenders, and issuers. Each one of these outside entities has responsibilities and obligations it must meet in responsibly doing business with the government. FHA, Ginnie Mae, and HUD must identify, mitigate, and manage risks related to each entity (also referred to as "counterparty") to protect the Mortgage Insurance Fund and the Guaranty Fund.

OIG has engaged in the following related oversight during this semiannual period.

#### **Recent OIG Reports**

HUD Can Improve Oversight of Its Temporary Endorsement Policy for Loans in COVID-19 Forbearance

OIG conducted an audit of HUD's temporary policy for endorsement of loans with coronavirus disease 2019 (COVID-19) forbearance activity to determine (1) whether HUD's temporary endorsement policy related to COVID- 19 forbearance activity was properly followed by lenders, (2) whether HUD monitored and enforced indemnification agreements for loans that were subject to the temporary policy, and (3) HUD's reasons for ending the policy during the pandemic and its plans to evaluate and use such policies in the future. The audit found that HUD did not ensure that lenders consistently followed policy requirements or that indemnification agreement data and records related to the policy were complete and accurate. OIG made several recommendations to HUD to resolve these findings and protect the FHA insurance fund from the risks identified. (HUD OIG Report No. 2023-NY-0002, Office of Single Family Housing)

Nationstar Generally Did Not Meet HUD Requirements When Providing Loss Mitigation to Borrowers of Delinquent FHA-Insured Loans

OIG conducted an audit of Nationstar Mortgage, LLC's compliance with FHA's requirements for providing loss mitigation assistance to borrowers. This audit was initiated due to a 2021 risk assessment



that identified a significant volume of delinquent loans with prior COVID-19 forbearance in Nationstar's portfolio and OIG's awareness of complaints made about Nationstar to the Consumer Financial Protection Bureau and the HUD OIG hotline. OIG found that Nationstar did not provide proper loss mitigation assistance to more than 80 percent of borrowers with delinquent FHA-insured loans after their COVID-19 forbearance ended. The report made six recommendations, including that HUD require Nationstar to take corrective actions to review and remediate sampled loans for which borrowers did not receive appropriate loss mitigation and implement controls and employee training. (HUD OIG Report 2023-KC-1001, Office of Single Family Housing)

Servicers Generally Did Not Meet HUD Requirements When Providing Loss Mitigation Assistance to Borrowers With Delinquent FHA-Insured Loans

OIG conducted an audit of loan servicers' compliance with FHA's requirements for providing loss mitigation assistance to borrowers after their COVID-19 forbearance ended. OIG initiated this audit because the loss mitigation programs available to the large number of borrowers exiting forbearance were new and created a risk for both borrowers and the FHA insurance fund when servicers did not properly provide loss mitigation. OIG found that the servicers did not provide proper loss mitigation assistance to approximately two-thirds of delinquent borrowers after their COVID-19 forbearance ended. OIG made six recommendations to HUD to address these findings, to include providing training and



#### New and Ongoing Related Oversight

Multifamily Mortgage Application Processing Delays, announced April 2023

<u>HUD-Held Vacant Loan Sales</u> <u>Controls for Mission-Driven</u> <u>Entities, announced April 2023</u>

COVID-19 Moratorium

Foreclosures, announced May
2023

Servicer Post-Moratorium
Foreclosures, announced May
2023

HUD's Measurement of Held
Vacant Loan Sales Mission
Objectives, announced July 2023

guidance to servicers and developing a plan to mitigate noncompliance moving forward. (HUD OIG Report 2023-KC-0005, Office of Single Family Housing)

The Inspector General issued a <u>press release</u> on the Office of Single Family Housing's loss mitigation for FHA loan servicing audit.

#### **Closure of Priority Recommendation**

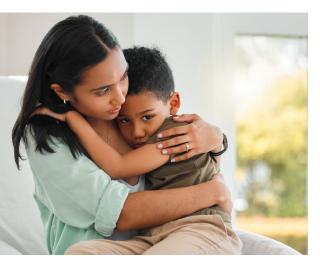
☑ In June 2023, HUD resolved recommendation 1B of HUD OIG Report 2022-KC-0002, Approximately 31,500 FHA-Insured Loans Did Not Maintain the Required Flood Insurance Coverage in 2020, by developing the following controls to detect loans that did not maintain the required flood insurance to put \$1.5 billion to better use and avoid potential future costs to the FHA insurance fund from inadequately insured properties.



- In November 2022, FHA published the Acceptance of Private Flood Insurance for FHA-Insured Mortgages final rule (Docket No. FR-6084-F-02) in the Federal Register and issued Mortgagee Letter 2022-18, Acceptance of Private Flood Insurance for FHA-Insured Mortgages. These policy changes not only strengthened the Office of Single Family Housing's lender requirements regarding flood insurance, but they also introduced the ability for borrowers and lenders to purchase private flood insurance.
- In January 2023, HUD updated the FHA Single Family Housing Policy Handbook (Handbook 4000.1), incorporating from Mortgagee Letter 2022-18 the requirement that the lenders review all FHA-insured properties annually to determine whether the property is located within a special flood hazard area. For properties located within a special flood hazard area, the lender must ensure that flood insurance is in force for the life of the mortgage and that the property has sufficient flood insurance coverage. To ensure compliance with the policy requirements, the lender must include updated flood insurance information for properties where flood insurance is required in the servicing and claims file. In addition, the Handbook includes flood insurance servicing policy updates.

The expansion of flood insurance to include private insurance and the addition of the requirement for lenders to review all FHA-insured properties annually to determine the flood zone and ensure adequate coverage will help ensure that properties have adequate flood insurance.





#### **Eliminating Hazards in HUD-Assisted Housing**

HUD is responsible for ensuring that all properties used in HUD programs are free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances. HUD is also responsible for ensuring that HUD-assisted programs and projects comply with HUD's environmental regulations. For instance, HUD is responsible for ensuring compliance with the Lead Disclosure Rule and Lead Safe Housing Rule through enforcement mechanisms and increased community awareness of lead and other health and safety hazards through outreach.

HUD OIG has conducted and continues to conduct related oversight focusing on HUD's approaches to identifying and

mitigating specific hazards and HUD's progress in enhancing its process for inspecting physical conditions in HUD-assisted housing. In furtherance of an <a href="Environmental Justice Initiative">Environmental Justice Initiative</a> announced earlier this year, OIG enhanced its outreach to focus on these critical issues and has worked with United States Attorneys' Offices across the country to help protect HUD's programs and beneficiaries from these hazards and from fraud, waste, and abuse.

#### **Recent OIG Reports**

#### Improvements Are Needed To Ensure That Public Housing Properties Are Inspected in a Timely Manner

OIG audited HUD's Real Estate Assessment Center's (REAC) inspection process to determine whether REAC (1) ensured that public housing properties were inspected within required timeframes before the COVID-19 pandemic, (2) could improve its "Big Inspection Plan" for inspecting high-priority non-National Standards for the Physical Inspection of Real Estate (NSPIRE) demonstration public housing properties, and (3) had experienced delays in inspecting the physical condition of public housing properties approved under the NSPIRE demonstration. The audit found that under phase I of the Plan, the Center did not inspect all of the high-priority non-NSPIRE public housing properties by December 2021. Under phase II, the inspections for these properties were generally not given priority. Further, REAC experienced delays in inspecting public housing properties approved to participate in the NSPIRE demonstration. In addition, procurement delays were found in the national inspection contract's being awarded. OIG made two recommendations to help HUD improve its procedures and controls, to prioritize certain properties for inspection, and to ensure that public housing properties are inspected in a timely manner. (HUD OIG Report No. 2023-CH-0003, Office of Public and Indian Housing)

#### HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments

OIG conducted an audit to assess whether HUD had adequate oversight of PHAs' (1) corrective actions in response to periodic REAC inspections and (2) annual self-inspections to ensure that units were maintained in a decent, safe, and sanitary condition. The audit found that:

 HUD field offices were inconsistent in overseeing whether PHAs corrected life-threatening deficiencies identified during REAC inspections,



- HUD did not track PHAs' corrections of non-life-threatening health and safety deficiencies identified during REAC inspections,
- HUD staff had varying interpretations of its requirements regarding the number of public housing units PHAs should self-inspect annually, and
- HUD's field office staff generally did not monitor PHAs for compliance with HUD's requirements for self-inspections.

OIG made several recommendations to address these findings, to include that HUD develop and implement a nationwide inspection review protocol and associated training for its field office staff. (HUD OIG Report No. 2023-CH-0004, Office of Public and Indian Housing)

<u>Statement of Inspector General Rae Oliver Davis on HUD OIG's audit of HUD's Real Estate Assessment</u> Center's process for inspecting the physical conditions of public housing units

#### **Closure of Priority Recommendations**

☑ On September 5, 2023, PIH resolved <u>recommendation 1A</u> from HUD OIG Audit Report 2020-CH-0003, <u>HUD Lacked Adequate Oversight of Public Housing Agencies' Compliance With the Lead Safe Housing Rule</u>, issued March 18, 2020, by ensuring that its staff appropriately determines exemptions from the Lead Safe Housing Rule and documents support of the determinations.

Specifically, in June 2023, HUD publicly issued Notice 2023-16, Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE) Administrative Procedures, providing guidance covering the process and operational requirements for HUD's public housing programs, which clarifies for its staff (1) actions that should be taken by the PHA and (2) documentation that must be provided to support that a housing unit is exempt from the Lead Safe Housing Rule.

The guidance describes the process that a PHA or property owners or agents must take when an NSPIRE inspection identifies deteriorated paint in a property or housing unit. Specifically, the PHA or property owners or agents should first verify that the property or housing unit is considered "target housing" and if so, determine whether it is exempt from the Lead Safe Housing Rule. If an exemption applies, documentation, such as a lease or other residency agreement affirming that the property is designated exclusively for occupancy by the elderly or persons with disabilities, must be provided to HUD. Other residency agreements could include a HUD-approved designated housing plan, a property deed or charter, or occupancy restrictions approved by HUD or the PHA's board of commissioners.

☑ On September 22, 2023, PIH resolved recommendation 1B from HUD OIG Audit Report 2020-CH-0003, HUD Lacked Adequate Oversight of Public Housing Agencies' Compliance With the Lead Safe Housing Rule, issued March 18, 2020, by ensuring that its staff determines whether a child under 6 years of age resides in an exempted development. If a child is determined to reside in an exempted development, PIH takes appropriate actions in accordance with its internal policies.

The Office of Field Operations (OFO) updated the Lead-Based Paint Response Tracker's standard protocol to identify the roles and responsibilities of HUD's headquarters and field office staff in ensuring PHAs' compliance with the Lead Safe Housing Rule. The protocol provides that the OFO



field office staff works directly with PHAs to resolve issues of noncompliance with the Rule and other lead-based paint guidance by responding to or escalating questions or issues to the headquarters team, directing PHAs to available training and resources on HUD.gov or HUD Exchange, and working with PHAs to obtain sufficient documentation to promptly close a lead-based paint case in the Lead-Based Paint Response Tracker. Regarding a child under 6 years of age residing in an exempted development, staff from the field offices must upload supporting documentation determining whether a pregnant woman or child 6 years of age or younger lives in the development, collect missing information if applicable, coordinate with the OFO team to close cases in the Lead-Based Paint Response Tracker, indicate in the Lead-Based Paint Response Tracker whether the PHA has provided the documents or the property is exempt, and upload supporting documents.





#### **Improving IT Modernization and Cybersecurity**

HUD and its stakeholders increasingly rely on HUD's information technology (IT) systems, which maintain at least a billion records containing personally identifiable information and facilitate thousands of transactions daily. OIG has made several priority recommendations through its oversight work to assist HUD in reaching its goal of strengthening its IT, cybersecurity, and data management systems and continuing toward adapting and implementing a secure and modernized IT environment.

#### **Recent OIG Report**

#### Fiscal Year 2023 Federal Information Security Modernization Act and Penetration Testing

OIG is conducting the fiscal year 2023 evaluation of HUD's information security program and practices, as required by the Federal Information Security Modernization Act of 2014 (FISMA). The evaluation objectives are to

- 1. Assess the maturity level of HUD's information security programs and practices based on the annual Inspector General (IG) FISMA reporting metrics. The assessment included 20 core IG metrics that are evaluated annually and group 1 of the supplemental FISMA metrics that are evaluated on a 2-year cycle.
- 2. Prepare responses for each Office of Management and Budget (OMB) and U.S. Department of Homeland Security CyberScope FISMA metric, including the support and documented conclusions for each response.
- 3. Conduct a limited network vulnerability assessment and penetration testing of a sample of HUD information systems and applications.

The assessment included 20 core metrics that OIG evaluates annually and group 1 of the supplemental FISMA metrics that are evaluated on a 2-year cycle. HUD's overall information security program scored a 2.60 for the 20-core metrics and a 2.86 for the fiscal year 2023 supplemental metrics. However, based on the fiscal year 2023 FISMA metrics issued by OMB, HUD's information security program was evaluated as level 2, "defined," which was not considered an effective level of maturity. On August 28, 2023, OIG reported its responses to the FISMA reporting metrics to the U.S. Department of Homeland Security's CyberScope portal. Testing for the FISMA narrative and penetration testing report is ongoing.





## Administering Disaster Recovery and Grants Management

Grant making is an essential component of HUD's business. HUD's grant portfolio includes a diverse range of programs that contribute toward HUD's strategic goals, including programs designed to advance housing justice, reduce homelessness, invest in the success of communities, increase the supply of affordable housing, strengthen environmental justice, and provide emergency funding for communities devastated by natural disasters and impacted by the pandemic.

HUD is responsible for administering billions of grant dollars each year effectively and in a timely manner. These funds are distributed to a wide variety of public and private grantees that often distribute funds to subgrantees, subcontractors, and other subrecipients to carry out work that advances HUD's mission. Under this structure, funds—as well as documentation and data—are distributed across a diverse range of organizations, geographic locations, and systems, making effective oversight a challenge.

#### **Recent OIG Reports**

#### HUD's Oversight of CDBG-DR Grantees' Use of Program Income

OIG conducted an audit of HUD's oversight of Community Development Block Grant Disaster Recovery (CDBG-DR) grantees' use of program income. The audit found that some grantees did not always (1) spend a substantial amount of their program income funds before using their disaster recovery funds and (2) submit Federal financial reports quarterly as required. As a result, HUD could not effectively track the status of grantee financial data related to program income and did not have reasonable assurance that it provided accurate grant data reports to Congress. OIG made several recommendations to HUD to improve its oversight of program income funds to reduce risks related to the reporting, reconciling, and spending of program income. (HUD OIG Report No. 2023-FW-0002, Office of Community Planning and Development)

#### <u>The Virgin Islands Housing Finance Authority's Administration of Its Non-Federal Match Program</u> Had Weaknesses

OIG conducted an audit of the Virgin Islands Housing Finance Authority's Non-Federal Match Program for CDBG-DR funds because of the \$415 million allocated by the Authority under its Match Program and to support HUD's strategic objective of promoting effectiveness and accountability in long-term disaster recovery. OIG determined that the Authority had (1) insufficient financial controls, (2) insufficient oversight of its Match Program-funded projects, (3) inaccurate performance measures reported in its quarterly performance reports, and (4) insufficient documentation to support its national objectives. OIG recommended that the Deputy Assistant Secretary for Grant Programs require the Authority to (1) develop and implement policies and procedures to address the challenges identified and (2) conduct training for its staff and disaster recovery Match Program recipients. (HUD OIG Report No. 2023-FW-1002, Office of Community Planning and Development)



# The Virgin Islands Housing Finance Authority Ineffectively Monitored CDBG-DR Activities

OIG conducted an audit of the Virgin Islands Housing Finance Authority's monitoring of its CDBG-DR-funded activities because of the large amount of disaster recovery funds awarded to the U.S. Virgin Islands for the 2017 disasters and to aid in HUD's strategic objective to support effectiveness and accountability in long-term disaster recovery. OIG found that the Authority did not (1) assess the activities' performance during its monitoring, (2) consistently track the status of corrective actions, (3) verify that the activities' national objectives were or are being met, and (4) consistently monitor the activities. OIG made several recommendations that the Deputy Assistant Secretary for Grant Programs require the Authority to develop and implement monitoring policies and detailed procedures to ensure that an activity's performance is assessed, corrective actions in monitoring reports are tracked, and documentation supporting the national objectives is verified. In addition, OIG recommended that the Authority revise subrecipient agreements to include performance metrics and milestones that are tailored to the activity.

(HUD OIG Report No. 2023-FW-1003, Office of Community Planning and Development)



#### New and Ongoing Related Oversight

New York-Based Grantee's
Emergency Solutions Grant CARES
Act (ESG-CV) Program Fraud Risk
Management Assessment,
announced April 2023

<u>HUD National Disaster Resilience</u> <u>Project Activity Status, announced</u> <u>June 2023</u>

Six Non-State Grantees' Use of CDBG-DR Grant Fund, announced July 2023

Hawaii-Based Grantee's ESG-CV
Program Fraud Risk Management
Assessment, announced July 2023

#### State of California, 2018 Disasters Owner-Occupied Rehabilitation and Reconstruction Program

OIG conducted an audit of the State of California's 2018 disaster owner-occupied rehabilitation and reconstruction program to determine to what extent resilience-based mitigation efforts help home owners to withstand potential future disasters, along with how the State is prioritizing its efforts in the program to assist qualified low-to-moderate-income beneficiaries. California had received more than \$1 billion for the 2018 disasters and had not yet disbursed most of its funding. OIG found that the State's program generally planned for resilience-based mitigation efforts and that the State prioritized its efforts to assist qualified low-to-moderate-income beneficiaries. The State faced some challenges in implementing this program due to its being one of the first housing rehabilitation and reconstruction programs addressing a wildfire disaster, such as verifying structure type and size and assessing ownership and primary residency. OIG recommended that the State ensure that it has proper documentation for compliance with building standards and ownership and primary residence determinations. (HUD OIG Report No. 2023-FW-1004, Office of Community Planning and Development)



#### Disaster Recovery Data Portal

OIG conducted an audit related to HUD's Disaster Recovery Data Portal, a technological solution planned by HUD to facilitate the rapid and secure transmission of data from the Federal Emergency Management Agency (FEMA) to HUD's CDBG-DR grantees. OIG found that (1) HUD prioritized the project but had not developed all of the required project management documents because the project team had been waiting for congressional approval of its project plan and (2) the Disaster Recovery Data Portal has the potential, once deployed, to be an effective mechanism to assist grantees in preventing and detecting duplication of benefits. However, the project's performance plan indicated that the Disaster Recovery Data Portal would include data from only one FEMA program, and the audit found that HUD's grantees could benefit from including additional data sources. OIG recommended that HUD (1) develop the required project management documents for the Disaster Recovery Data Portal and (2) pursue additional data sources to incorporate into the Disaster Recovery Data Portal. (HUD OIG Report No. 2023-FW-0003, Office of the Chief Information Officer, Office of Policy Development and Research and Office of Community Planning and Development)

<u>HUD's Assistance and Grantee Challenges With the Office of Native American Programs' COVID-19</u> Recovery Programs

OIG conducted an audit of HUD's Office of Native American Programs' (ONAP) COVID-19 recovery programs. OIG found that HUD provided information, guidance, and training to assist grantees in navigating the programs soon after the funding was appropriated. Most grantees reported that they were satisfied with the resources and assistance HUD provided but reported facing challenges in using funds that were primarily outside HUD's control, including a lack of supplies, contractors, and capacity, as well as increased cost of supplies. These challenges occurred in part due to many factors, such as the worldwide supply chain problems and the influx of Federal funding, and existing systemic problems, including the lack of affordable housing. As a result, approximately \$531.5 million of the \$1.03 billion that Congress authorized for the ONAP COVID-19 recovery programs remained available to be drawn by grantees (about 52 percent) approximately 2 years after the funding was appropriated. OIG recommended that the Deputy Assistant Secretary for Native American Programs consider grantee feedback on the challenges they faced as part of ONAP's planning for technical assistance and training of ONAP COVID-19 recovery program grantees. (HUD OIG Report No. 2023-LA-0005, Office of Native American Programs)

#### **Closure of Priority Recommendation**

☑ In September 2023, HUD resolved recommendation 1B from HUD OIG Report 2022-AT-1001, Opportunities Exist To Improve CPD's Oversight of and Monitoring Tools for Slow-Spending Grantees, by updating its policies and procedures for tracking expenditures related to slow-spending grantees, including steps for assisting the grantees to expedite spending (including the grantee's steps or actions to address slow spending), identifying the reasons for the delays with the grant, and documenting the outcome of its efforts.

Specifically, the Office of Community Planning and Development (CPD) updated guidance addressing grantee slow spending through technical assistance, including actions grant managers can take when grantee expenditures do not appear to be "on pace" to meet the expenditure deadlines, and



demonstrated that it was providing technical assistance to grantees during monitoring. CPD also issued an additional Standard Monitoring Findings and Corrective Actions Guide for its staff to promote a consistent framework for crafting monitoring findings and the corrective actions needed to resolve identified deficiencies and prevent future occurrences. This new resource provides general guidance and examples for presenting finding components in monitoring reports for 14 topics, including, "Failure To Meet Timeliness of Expenditures Requirements."

#### Outreach

During this semiannual period, OIG provided several anti-fraud training sessions related to disaster recovery to grantees, subrecipients, contractors, and vendors across the Nation:

- May 16, 2023: Iowa Department of Economic Development
- June 14, 2023: Missouri Department of Economic Development and New Jersey Department of Community Affairs
- August 22, 2023: Florida Department of Economic Opportunity
- August 29, 2023: Mississippi Development Authority, Alabama Department of Economic and Community Affairs, and Florida Department of Economic Opportunity

#### **Related Investigation**

<u>Former West Haven Employee and State Representative Sentenced to Prison for Stealing COVID Relief</u> and Other City <u>Funds</u>

A former State representative of the Connecticut State Legislature and administrative assistant to the City of West Haven Council, the wife of the former representative, a former housing specialist with the City of West Haven Community Development Administration, and a business owner were collectively sentenced in U.S. District Court for the District of Connecticut to 142 months incarceration, 6 months home confinement, and 18 years supervised release and ordered to pay more than \$1.2 million in restitution to the City of West Haven. From July 2020 to September 2021, the conspirators formed various businesses under the guise of providing COVID-related services to the City of West Haven. Through these businesses, the conspirators purported to provide COVID-related equipment and services, such as personal protective equipment; cleaning services and supplies for municipal buildings; wi-fi services for low- and moderate-income families; and legal, lobbying, and consulting services to the City of West Haven. The conspirators then submitted fraudulent invoices to the City of West Haven and received payment for services that were never provided.





#### **Sustaining Progress in Financial Management**

HUD OIG conducts mandatory annual audits of financial statements of HUD, FHA, and Ginnie Mae. Those financial statement audits are ongoing and will be released during the next reporting period.

In addition, HUD OIG conducts a mandatory annual audit of HUD's compliance with the Payment Integrity Information Act of 2019 (PIIA). This audit was completed during this semiannual period, and its findings are reported below.

#### **Recent OIG Report**

#### HUD Did Not Comply With the Payment Integrity Information Act of 2019

OIG issued its annual audit of HUD's fiscal year 2022 compliance with PIIA and implementation of OMB guidance. The audit found that HUD did not comply with PIIA because it did not report improper and unknown payment estimates for PIH's Tenant-Based Rental Assistance (PIH-TBRA) program and the Office of Multifamily Housing Programs' Project-Based Rental Assistance (PBRA) program, which spent \$41 billion in fiscal year 2022 and represented 61.6 percent of HUD's total expenditures. In addition, the audit found opportunities for HUD to enhance its process for assessing improper payment risk and that PIH did not conduct monitoring reviews to detect, prevent, and recover improper payments in the PIH-TBRA program. OIG made several recommendations to address the report's findings, to include that HUD establish an improper payment council to identify risks and challenges to compliance and identify solutions as a collaborative group. Statement of Inspector General Rae Oliver Davis on HUD OIG's audit of HUD's compliance with the Payment Integrity Information Act of 2019

#### (HUD OIG Report 2023-FO-0009, Office of the Chief Financial Officer)

#### **Closure of Related Recommendations**

- ✓ HUD OIG is pleased to report that during this semiannual period, HUD closed several recommendations from prior financial statement audits as follows:
  - FHA closed seven recommendations, 1A-1G, in HUD OIG's <u>Audit of FHA's Fiscal Years 2022 and 2021 Financial Statements</u>, related to weaknesses in internal controls over FHA's borrowing authority that resulted in excess borrowing and late material errors in fiscal year 2022.
  - HUD's Office of the Chief Financial Officer revised its grants accrual policy and developed a
    procedure that closed three recommendations, 1A, 1B, and 1C, from HUD OIG's <u>Audit of HUD's</u>
    <u>Fiscal Years 2022 and 2021 Financial Statements</u>, related to a longstanding weakness in the area
    of grant accrual.





#### **Fraud Risk Management**

Fraud risk management is a challenge throughout the Federal Government. Beyond the monetary loss to taxpayers, fraud against HUD programs reduces HUD's ability to meet the needs of vulnerable communities with critical housing needs.

Through its oversight, OIG identified systemic challenges HUD faces in completing its testing and mitigation requirements for programs susceptible to significant improper and unknown payments. OIG has issued recommendations concerning the development of program-specific fraud risk assessments and risk

profiles for HUD's pandemic relief and other community planning and development programs to assist HUD in identifying and reducing improper payments. Implementation of these recommendations related to the development of program-specific fraud risk assessments and risk profiles will help HUD improve its fraud risk management practices, reduce the risk of fraud against its programs, and reduce reputational risk to the Department.

Throughout this SAR, OIG includes examples of fraud cases pursued by its Office of Investigation during this semiannual period. Many of these cases involved complex multiagency investigations conducted in coordination with OIG's law enforcement partners and in coordination with the U.S. Department of Justice.

#### **Recent OIG Report**

<u>Management Alert: HUD Should Take Additional Steps To Protect Contractor Employees Who Disclose</u>
Wrongdoing

HUD OIG issued a management alert identifying a substantial gap in whistleblower protections, whereby thousands of contractor employees may not be protected from retaliation for blowing the whistle on wrongdoing because they work under contracts that predate the 2013 antiretaliation statute, which provides those safeguards. OIG made several recommendations that HUD take steps to ensure protections for contractor employees who make disclosures of wrongdoing and identified three of these recommendations as "priority."

#### **Investigative Press Releases**

The press releases below are organized by category to demonstrate the types of schemes that impact HUD's programs and beneficiaries and the significant risk that fraud poses to HUD's programs and the communities that rely on them.



#### **Pandemic-Related Fraud:**

Former West Haven Employee and State Representative Sentenced to Prison for Stealing COVID Relief and Other City Funds

#### **Public Corruption:**

- West Haven Man Sentenced to 8 Years in Federal Prison for Role in Scheme to Steal City's COVID Relief Funds
- Former Housing Authority Executive Director Sentenced to Federal Prison for Using Funds for Personal Expenses
- Walter Pierluisi Isern, Eduardo Pierluisi Isern, and American Management and Administration Corporation Sentenced for Federal Program Theft in Excess of \$3.7 Million

#### **Federal Program Theft-Embezzlement:**

- Former Champaign, Illinois, Pastor Sentenced to 10 Months of Imprisonment for Misapplying Federal Funds and Bankruptcy Fraud
- Beckley Man Pleads Guilty to Federal Fraud Crime
- Albert Lea Woman Sentenced to Prison for Embezzling Over \$200,000 in Public Housing Rent Payments
- Former Islamic Center Director Sentenced to Prison for Embezzling Funds, Committing Fraud
- Former Housing Authority Executive Director Sentenced to Federal Prison for Using Funds for Personal Expenses

#### Bank, Mortgage, and Deed Fraud:

- Independence Man Sentenced to 17 Years in Prison for \$2.2 Million Fraud Schemes
- Movement Mortgage To Pay \$23.7 Million To Resolve Allegations It Caused the Submission of False Claims to Government Mortgage Programs



#### **Fraud Bulletins**

During this semiannual period, OIG developed and published multiple bulletins to protect communities from fraudulent schemes and misconduct that often target the most vulnerable populations.

<u>Sexual harassment</u> to inform the public of their rights to be protected from sexual harassment in housing, to provide examples of sexual harassment and misconduct, and to share information about how to report allegations and file a complaint.

<u>Foreclosure fraud schemes</u> in which scammers contact vulnerable populations at risk of losing their homes, falsely informing them that they can help with mortgage payments, offering false legal representation, or asking for money to help them save their homes. The bulletin shares red flags, tips for how to avoid these fraud schemes, and information on how to report foreclosure fraud.

<u>Social media scams</u> regarding fraudsters impersonating HUD employees and using social media to offer grants or housing assistance from HUD and asking for payment or personal information to receive grant funds. This bulletin warns the public that fraudsters may use social media schemes or other tactics to steal money by offering fake HUD benefits or fake HUD grants.

<u>Disaster repair scams and contractor fraud</u> regarding fraudsters who may try to take advantage of quick timeframes and difficult circumstances that individuals and communities face following a disaster.

<u>Mortgage rescue scams following a disaster</u> targeting home owners who experience a temporary or permanent loss of income due to a natural disaster or an increase in expenses post disaster who may be financially vulnerable, making it difficult for them to make mortgage payments. View the video.

<u>Hawaii wildfires: fraud risk awareness for affected residents</u> regarding the devastating and tragic wildfires on Hawaii's Maui that cause hardship conditions that leave individuals, businesses, and communities vulnerable to bad actors who take advantage of those impacted by these severe emergencies.



## **Additional Significant Reports**

HUD OIG's additional significant reports are highlighted in this section.

The Stark Metropolitan Housing Authority, Canton, OH, Did Not Always Comply With Federal and Its Own Procurement Requirements

OIG conducted an audit of the Stark Metropolitan Housing Authority's public housing program based on significant deficiencies noted during its prior audit of the Authority. The audit found that the Authority did not always comply with Federal and its own procurement requirements. Specifically, for the contracts reviewed, it did not always (1) maintain complete and consistent documentation detailing the significant history of procurements, (2) properly execute contracts for pest control services, (3) maintain sufficient documentation to support the reasonableness of contract costs, and (4) include the minimum and maximum quantity or amount in its indefinite-quantity delivery contracts. Further, the Authority paid more than the contract value for services procured with one contractor. OIG made several recommendations to HUD to address these findings. (HUD OIG Report No. 2023-CH-1002, Office of Public and Indian Housing)

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#### New and Ongoing Related Oversight

Assessing Equity in the Fair
Housing Initiatives Program
Education and Outreach Initiative,
announced April 2023

FY 2023 HUD Travel and Purchase Cards Continuous Monitoring, announced May 2023



#### **Whistleblower Protection**

Whistleblowers play a critical role in keeping Government programs honest, efficient, and accountable. OIG continues to ensure that HUD and OIG employees are aware of their rights to disclose misconduct, waste, or abuse in HUD programs without reprisal and to seek redress when employees believe that they have been subject to retaliation for whistleblowing. Generally, OIG will refer these employees to the U.S. Office of Special Counsel.

In addition, OIG receives complaints filed under 41 U.S.C. 4712, the statute that extends whistleblower protections to employees of Federal contractors, subcontractors, grantees, subgrantees, and personal services contractors. An employee covered by Section 4712 may file a retaliation complaint with OIG. In turn, OIG reviews these retaliation complaints and, when appropriate, investigates the allegations and provides a report of findings to the HUD Secretary for a determination as to whether unlawful reprisal has occurred.

The chart below provides further information on whistleblower retaliation complaints received by OIG during the period covered by this report.

Number of complaints alleging whistleblower retaliation	63
Complaints meeting threshold requirements for investigation	27

Alongside OIG's investigative role, the OIG's Whistleblower Protection Coordinator (WPC) also assists employees by providing training and information related to

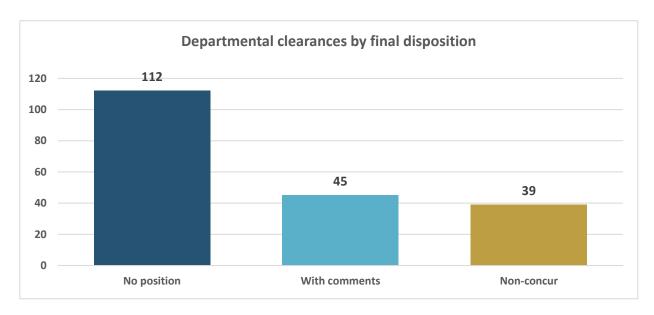
- options for disclosing misconduct, waste, or abuse in HUD programs;
- statutory protections for employees who make such disclosures; and
- the process for filing a complaint when an employee believes he or she has been retaliated against for making protected disclosures.

OIG's mandatory whistleblower training for OIG personnel is an interactive, virtual training about whistleblower rights and protections, making protected disclosures, and how to report wrongdoing. The WPC can be contacted via email at <a href="whistleblower@hudoig.gov">whistleblower@hudoig.gov</a>.



## Legislation, Regulations, and Other Directives

Reviewing and making recommendations on legislation, regulations, and policy issues is a critical part of OIG's responsibilities under the Inspector General Act of 1978, as amended. During this 6-month reporting period, OIG reviewed 196 issuances. The draft directives consisted of 137 notices, 12 mortgagee letters, and 47 other directives. OIG provided comments on 45 (23 percent) of the issuances and nonconcurred on 39 (20 percent). Of the 47 other directives, OIG reviewed 17 research reports, 3 final rules and 10 proposed rules, 9 handbooks-guidebooks, 1 frequently asked questions document, 1 policy statement, and 6 other items.



#### Legislation

# **HUD's Request for Permanent Authorization of the CDBG-DR Program in Response to OIG Recommendations**

CDBG-DR grant funds are not provided under a program codified in the Code of Federal Regulations (CFR). Although the CDBG program requirements provide a framework, HUD must issue Federal Register (FR) notices with additional, disaster-specific program requirements and waivers for each supplemental appropriation. With each newly issued FR notice, grantees must navigate the various notices, consider their communities' pressing unmet needs, and develop a program that navigates both. These steps are expected to be completed during a time of great uncertainty, given that personnel, operations, and infrastructure may have been impacted following a disaster. OIG and the U.S. Government Accountability Office have issued multiple oversight reports with recommendations to ensure that HUD's disaster recovery funding reaches vulnerable communities quickly.

HUD OIG has recommended that HUD codify the CDBG-DR program through regulations to simplify and standardize the process and, more recently, that HUD pursue codification of the CDBG-DR program through regulations or, if necessary, seek legislative action. HUD has consistently maintained that it does not have the statutory authority to codify the CDBG-DR program through the regulatory process. It has



taken positive steps it believes it has the authority to take, including through its consolidated notices and program guides for grantees and others. HUD has also taken consistent, meaningful steps to address OIG's recommendations to pursue permanent authorization through legislative action. Secretary Fudge and former Secretary Carson have both expressed public support for permanent authorization in testimony before committees of Congress. Importantly, HUD's Fiscal Year 2024 Congressional Budget Justification notes:

Permanent authorization of CDBG-DR would improve the transparency and predictability of CDBG-DR funds made available to impacted communities. Permanent authorization would also require HUD to establish consistent regulatory requirements for CDBG-DR across all future disasters, eliminating the current practice of establishing new requirements in response to each supplemental appropriation of CDBG-DR funds.

In successive Congresses, bipartisan, bicameral congressional support for permanent authorization has resulted in bills, such as the House and Senate versions of The Reforming Disaster Recovery Act, which are responsive to HUD OIG's recommendations. Permanently authorizing the CDBG-DR program would streamline, reform, and inject greater fiscal responsibility into the program; mitigate funding lags and duplicative requirements; and ultimately help HUD achieve its mission of serving communities struck by natural disasters with critical housing assistance in a timely manner.

#### Whistleblower Protections for Employees of Contractors, Subcontractors, Grantees, and Subgrantees

On May 31, 2023, HUD OIG issued a management alert identifying a substantial gap in whistleblower protections, whereby thousands of contractor employees may not be protected from retaliation for blowing the whistle on wrongdoing because they work under contracts that predate the 2013 antiretaliation statute that provides those safeguards. OIG made several recommendations that HUD take steps to ensure protections for contractor employees who make disclosures of wrongdoing and seek legislative authority to modify contracts to include Section 4712 without waiting for a future renegotiation of the contracts. HUD has provided a partial draft management plan, which is being considered by OIG. By addressing this recommendation, HUD can close a substantial gap in protections for potential whistleblowers and promote integrity in HUD's programs.

#### **Warnings and Certifications**

According to the Inspector General Act of 1978, as amended, OIG is responsible for providing policy direction for, recommending policies to promote economy and efficiency in the administration of, and preventing and detecting fraud and abuse in HUD's programs and operations, to include the identification and prosecution of participants in such fraud or abuse. OIG regularly makes recommendations to HUD to include standard warnings and certifications in its policies and forms to protect HUD's programs from fraud. Clear warnings on HUD documents put fraudsters on notice that there can be serious criminal, civil, and administrative consequences to their actions to help discourage fraud. Certifications of accuracy and truthfulness under penalty of perjury, as well as warnings, play an important role in promoting accountability and enabling effective prosecution of those who commit fraud.



Based on the above, OIG continues to recommend that HUD include the following language in policies that it reviews:

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

HUD has continuously been receptive to these recommendations and has accepted and incorporated OIG's recommended warning and certification language into several of its policies.

#### **Notices and Other Directives**

Fiscal year 2023 notices of funding opportunity – On May 30, 2023, HUD OIG issued a management alert recommending that HUD take additional steps to ensure that contractors are protected by the whistleblower antiretaliation provisions codified at 41 U.S.C. 4712. In HUD's response to the management alert, HUD asserted that "a provision incorporating Section 4712 is included in HUD's program Notices of Funding Opportunities in its 'Administrative, National and Departmental Policy Requirements and Terms for HUD Applicants and Recipients of Financial Assistance Awards.'" However, during HUD OIG's review of subsequent notices of funding opportunities (NOFO), Section 4712 protections were not adequately included in HUD's standard NOFO language. As a result, HUD OIG nonconcurred on 14 NOFOs. Following close collaboration on this issue between HUD OIG and HUD's Office of General Counsel, HUD has resolved 10 of the nonconcurrences by adding language suggested by HUD OIG. The other four NOFOs are still under HUD review. In addition, HUD is incorporating HUD OIG's suggested language into its fiscal year 2024 NOFO template, so that all NOFOs will include the language going forward.

Departmental policy for addressing radon in the environmental review process – HUD issued this notice to clarify that radon must be considered in the contamination analysis required under 24 CFR parts 50 or 58, as applicable; to provide guidance on recommended best practices for considering radon; and to identify the HUD programs that have established specific radon guidance. This notice does not impose radon testing requirements; however, it does include guidance on strategies for considering radon in the site contamination analysis. In 2021, OIG issued an <u>evaluation</u> of HUD program offices' policies and approaches for radon. As a result of the evaluation, OIG recommended, among other things, that HUD "[d]evelop and issue a departmentwide policy that notes that radon is a radioactive substance and outlines HUD's requirements to test for and mitigate excessive radon levels in accordance with 24 CFR 50.3(i)(1) and 58.5(i)(2)(i)." The notice addresses this recommendation.

<u>Departmental grant accrual policy</u> (14-002, Revision 1) – HUD issued this document to establish a policy for estimating and validating accruals for HUD grant programs. HUD followed guidance in the Federal Accounting Standards Advisory Board's Federal Financial Accounting Technical Release 12 (TR12), Accrual Estimates for Grant Programs, in the development of the Department's grant accrual policy. All accrual estimates for grant programs are to be calculated in accordance with TR12. This policy outlines recommended methods for accruing grant expenses.



The changes respond to OIG Report 2023-FO-0004, Audit of HUD's Fiscal Years 2022 and 2021 Financial Statements, recommendation 1A, which recommended that HUD "[d]evelop and issue a departmental grant accrual validation policy or update the existing grant accrual policy to include the validation process. The policy should include:

- 1) specific control activities over the grant accrual validation and outline all of the specific roles and responsibilities;
- 2) a periodic review of the grant accrual validation to evaluate and reassess its continued relevance and control effectiveness, and ensure any changes are designed and implemented appropriately; and
- 3) a clear communication plan that requires formal and documented communications between appropriate program offices and OCFO [Office of the Chief Financial Officer] to ensure the validation results are used to update the grant accrual methodology and subsequent period's estimate, as appropriate."

Award closeout standard operation procedures — This guidance provides the process and requirements for closing out awards. Closeout is the process by which HUD determines that all applicable administrative actions and all required work of the Federal award have been completed by the award recipient according to 2 CFR 200.1. In addition, this standard operation procedures (SOP) guidance addresses HUD's implementation of closeout requirements (2 CFR 200.344 for new awards and 2 CFR 200.343 for old awards) and reminds recipients of post closeout adjustments and continuing responsibilities (2 CFR 200.345 for new awards and 2 CFR 200.344 for old awards). Further, this SOP is applicable to discretionary grants and cooperative agreements made before August 13, 2020, ("old awards") and made on and after August 13, 2020, ("new awards"), collectively referred to as "awards." This was a management letter item from the fiscal year 2022 HUD financial statement audit (2023-FO-0007-ML). The recommendation was to establish and implement a policy and procedure for ensuring that the program offices close out grants in accordance with 2 CFR 200.344 (g) and (h). OIG provided comments but did not nonconcur on the substance of the notice.

National Standards for the Physical Inspection of Real Estate: Inspection Standards – The series of clearances serves to complement the Economic Growth Regulatory Relief and Consumer Protection Act: Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE). The purpose of NSPIRE is to strengthen HUD's physical condition standards and improve HUD oversight through the alignment and consolidation of the inspection regulations used to evaluate HUD housing across multiple programs. Specifically, the implementation of NSPIRE seeks to ensure that residents of HUD housing live in safe, habitable dwellings and the items and components located in inside and outside of HUD housing are functionally adequate, operable, and free of health and safety hazards. NSPIRE applies to public housing and multifamily housing programs, as described in the NSPIRE rule. The scoring methodology converts observed defects into a numerical score and sets a threshold for HUD to perform additional administrative oversight when a property fails an inspection (less than 60 points) or refer a property for enforcement (less than or equal to 30 points).

To incorporate resident feedback into the NSPIRE inspection program, HUD will gather customer experience type insights through a HUD inspection feedback survey, a mechanism to quickly identify and

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address residents' pain points about the inspection process and to guide HUD's efforts to improve residents' general satisfaction with their housing conditions. Supplementary departmental notices will be issued when HUD has increased capability to gather resident feedback beyond customer experience type insights.

All participating landlords and families must be notified of NSPIRE, what the NSPIRE Standards are, and when these changes will take effect for their inspections. To properly prepare for NSPIRE inspections, PHAs must also ensure that inspectors are trained on NSPIRE standards.

Moving to Work amendment to consolidated annual contributions contract - HUD is seeking approval from OMB for information collection regarding the Moving to Work (MTW) amendment to consolidated annual contributions contracts (ACC). The amendment to the ACCs is necessary for HUD to implement the expansion of the MTW program enacted by Congress in the Consolidated Appropriations Act, 2016 (Public Law 114-113, approved December 18, 2015) (2016 Appropriation). It establishes the basic terms and conditions that will apply to 100 new PHAs participating in the MTW demonstration under the 2016 Appropriation. Specifically, the MTW ACC amendment amends any ACCs for public housing or the HCV Program in effect between the PHA and HUD to establish the PHA's designation as an MTW agency and to operate in accordance with the requirements of the MTW demonstration program, as amended by the Act. The MTW ACC amendment establishes the terms of participation in MTW, including the requirement that the PHA follow the MTW operations notice and its respective selection notice. The PHAs remain subject to the applicable ACCs to the extent that the provisions are not otherwise waived by the operations notice or the applicable MTW selection notice. Additionally, the MTW ACC amendment outlines PHA transition out of the demonstration and HUD termination rights upon PHA default.

<u>Certain regulatory waivers for the HCV Program</u> – To assist PHAs in managing ongoing challenges related to rental market fluctuations, HUD has created a streamlined waiver process for four payment standard-related waivers for (1) new payment standard amounts through December 31, 2024, and (2) increasing the payment standard during the housing assistance payments contract term. Note that waivers offered under this notice are different from those offered under Notice PIH 2022-30 and its predecessor notices. In the prior notices, the regulatory waiver of 24 CFR 982.503(b)(1)(i) allowed PHAs to adjust the fair market rent basic range up to 120 percent. Under this notice, PHAs will apply for regulatory waivers related to exception payment standards.





## **Peer Review**

The Dodd-Frank Wall Street Reform and Consumer Protection Act (Public Law No. 111-203), section 989C, requires inspectors general to report the latest peer review results in their semiannual reports to Congress. The purpose of doing so is to enhance transparency within the Government. HUD OIG's Office of Audit, Evaluation, and Office of Investigation are required to undergo a peer review every 3 years. The purpose of the review is to ensure that the work completed by the respective organizations meets the applicable requirements and standards.

The following is a summary of the status of the latest round of peer reviews:

Table 1. Peer reviews conducted of HUD OIG

Type of review	Date of peer review	Reviewing OIG	Rating	Outstanding recommendations
Audit	December 17, 2021	USAID* OIG	Pass	None
Evaluation	March 28, 2023	DHS** OIG	In compliance	None
Investigation	October 14, 2022	SSA*** OIG	In compliance	None

Table 2. Peer reviews conducted by HUD OIG

Type of review	Date of peer review	OIG Reviewed	Rating	Outstanding recommendations
Audit	June 24, 2022	DOE**** OIG	Pass	None
Evaluation	August 24, 2023	TVA**** OIG	In compliance	None
Investigation	June 5, 2020	DHS OIG	In compliance	None

<sup>\*</sup> U.S. Agency for International Development

<sup>\*\*</sup> U.S. Department of Homeland Security

<sup>\*\*\*</sup> Social Security Administration

<sup>\*\*\*\*</sup> U.S. Department of Energy

<sup>\*\*\*\*\*</sup> Tennessee Valley Authority



# **Appendix 1 - Reports Issued This Semiannual Period**

## **Audit Reports**

# Chief Financial Officer 2023-FO-0009 HUD Did Not Comply With the Payment Integrity Information Act of 2019, Washington, DC, 05/22/2023.

Community Planning and Development		
2023-FW-0002	HUD's Oversight of CDBG-DR Grantees' Use of Program Income, 05/17/2023. Questioned: \$2,551,375. Unsupported: \$2,551,375.	
2023-FW-1002	The Virgin Islands Housing Finance Authority's Administration of Its Non-Federal Match Program Had Weaknesses, 06/12/2023.	
2023-FW-1003	The Virgin Islands Housing Finance Authority Did Not Effectively Monitor Its CDBG-DR Activities, 06/12/2023.	
2023-FW-1004	State of California, 2018 Disasters Owner-Occupied Rehabilitation and Reconstruction Program, 07/13/2023.	

Housing	
2023-KC-0005	Servicers Generally Did Not Meet HUD Requirements When Providing Loss Mitigation Assistance to Borrowers With Delinquent FHA-Insured Loans, 06/13/2023.
2023-NY-0002	HUD Can Improve Oversight of Its Temporary Endorsement Policy for Loans in COVID-19 Forbearance, 05/15/2023. Better use: \$32,144,945.
2023-KC-1001	Nationstar Generally Did Not Meet HUD Requirements When Providing Loss Mitigation to Borrowers of Delinquent FHA-Insured Loans, 06/13/2023.

Policy Developm	ent and Research
2023-FW-0003	Disaster Recovery Data Portal, 07/21/2023.



Public and Indian Housing			
2023-CH-0003	Improvements Are Needed To Ensure That Public Housing Properties Are Inspected in a Timely Manner, 05/23/2023.		
2023-CH-0004	HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments, 05/30/2023.		
2023-LA-0005	HUD Assisted Grantees in Navigating the Office of Native American Programs' COVID-19 Recovery Programs, but Grantees Reported Challenges, 07/28/2023.		
2023-CH-1002	The Stark Metropolitan Housing Authority, Canton, OH, Did Not Always Comply With Federal and Its Own Procurement Requirements, 05/24/2023. Questioned: \$186,897.  Unsupported: \$186,897.		

## **Management Alert**

Office of Special	Inquiry
2023-IG-002	HUD Should Take Additional Steps To Protect Contractor Employees Who Disclose Wrongdoing, 05/31/2023.



# **Appendix 2 – Streamlined Semiannual Reporting Requirements**

Section 5273 of the Fiscal Year 2023 National Defense Authorization Act (NDAA) included reforms recommended by the Inspector General community as part of its legislative priorities for the 117th Congress, streamlining and modernizing semiannual reporting requirements, maximizing transparency, and allowing OIGs to better focus semiannual reports on their most significant activities and most critical issues facing the agencies they oversee.

These reforms provide more flexibility to each OIG to use the SAR as a conduit for information that it has already made public and to leverage external websites, to include www.oversight.gov. In addition, the NDAA eliminated certain reporting requirements that had been incorporated into The Inspector General Empowerment Act (Public Law 114-317), enacted in December 2016.

Below are HUD OIG's statutory requirements as set forth by the NDAA, as well as the Trafficking Victims Prevention and Protection Reauthorization Act of 2022.

#### Federal Financial Management Improvement Act of 1996 – (a)(7)

Section 803(a) of the Federal Financial Management Improvement Act (FFMIA) requires that each agency establish and maintain financial management systems that comply with (1) Federal financial management system requirements, (2) Federal accounting standards, and (3) the United States Standard General Ledger at the transaction level. Section 803(c) of FFMIA requires an agency to establish a remediation plan if it is determined that the agency's financial management systems do not comply with the requirements of section 803(a). Section 804(b) of FFMIA requires OIG to report in its SARs instances and reasons when an agency has not met the intermediate target dates established in its remediation plans.

As of September 30, 2023, OIG and HUD had not identified any systems that were noncompliant with the three section 803(a) elements of FFMIA. HUD has closed all previous recommendations related to previously noncompliant systems.



#### Statistical Table Showing Investigative Report Metrics – (a)(11) and (12)

The data used in this statistical table were extracted from HUD OIG's Case Management System. The Case Management System and its underlying infrastructure allow for data input and maintain data integrity during the complete investigative case cycle, while ensuring data privacy and confidentiality. The system was developed in .Net 4.8, and the database is SQL 2017. HUD OIG develops queries to extract data from the Case Management System to meet business requirements, such as the information used to create this statistical table. The footnotes table provides additional guidance pertaining to each requested category of information.

Measure	Total
A. Total number of investigative reports issued during the reporting period	130
B. Total number of persons referred to the U.S. Department of Justice for criminal prosecution during the reporting period	37
C. Total number of persons referred to State and local prosecuting authorities for criminal prosecution during the reporting period	9

D. Total number of indictments and criminal informations during the reporting period that resulted from any prior referral to prosecuting authorities

56

#### **Footnotes**

- A. Includes approved reports of investigation
- D. Includes all charging documents reported: criminal complaints, indictments, informations, and superseding indictments

#### Senior Government Employee Investigations - (a)(13)

A report on each investigation conducted by the Office where allegations of misconduct were substantiated involving a senior Government employee or senior official (as defined by the Office) if the establishment does not have senior Government employees, which shall include - (A) the name of the senior Government employee, if already made public by the Office; and (B) a detailed description of - (i) the facts and circumstances of the investigation; and (ii) the status and disposition of the matter, including - (I) if the matter was referred to the Department of Justice, the date of the referral; and (II) if the Department of Justice declined the referral, the date of the declination.

OIG initiated an investigation based on allegations that a senior HUD employee was working as a private contractor for another Federal agency while also being employed with HUD in a full-time capacity. Based upon this information, it was alleged that the subject had been employed full time outside the



subject's HUD employment without prior authorization or notification to the subject's supervisor. The investigation substantiated the allegations and determined that the senior HUD employee, while on a full-time telework agreement with HUD, also maintained a full-time private contractor position with another Federal agency. On March 6, 2023, this investigation was presented and subsequently declined for prosecution by the U.S. Attorney's Office for the District of Columbia. The employee resigned on December 30, 2022.

#### Instances of Whistleblower Retaliation – (a)(14)

(A) a detailed description of any instance of whistleblower retaliation, including information about the official found to have engaged in retaliation and (B) what, if any, consequences the establishment actually imposed to hold the official described in subparagraph (A) accountable.

None.

#### OIG Independence – (a)(15)

Information related to interference by the establishment, including - (A) a detailed description of any attempt by the establishment to interfere with the independence of the Office, including - (i) with budget constraints designed to limit the capabilities of the Office; and (ii) incidents where the establishment has resisted or objected to oversight activities of the Office or restricted or significantly delayed access to information, including the justification of the establishment for such action; and (B) a summary of each report made to the head of the establishment under section 6(c)(2) during the reporting period.

None.

#### Reports That Were Closed During the Period That Were Not Disclosed to the Public - (a)(16)

Detailed descriptions of the particular circumstances of each (A) Inspection, evaluation, and audit conducted by the Office that is closed and was not disclosed to the public and (B) Investigations conducted by the office involving a senior government employee that is closed and not disclosed to the public.

OIG initiated an investigation based on allegations that a senior HUD employee was working as a private contractor for another Federal agency while also being employed with HUD in a full-time capacity. Based upon this information, it was alleged that the subject had been employed full time outside the subject's HUD employment without prior authorization or notification to the subject's supervisor. The investigation substantiated the allegations and determined that the senior HUD employee, while on a full-time telework agreement with HUD, also maintained a full-time private contractor position with another Federal agency. On March 6, 2023, this investigation was presented and subsequently declined for prosecution by the U.S. Attorney's Office for the District of Columbia. The employee resigned from HUD on December 30, 2022.

OIG investigated allegations that a senior HUD official did not obtain proper approval to participate in a training program and also misused official funds to pay for the program. After conducting interviews and reviewing documents, including applicable laws and regulations, OIG concluded that there was insufficient evidence to substantiate these allegations.



#### **Trafficking Victims Prevention and Protection Reauthorization Act of 2022**

The Trafficking Victims Prevention and Protection Reauthorization Act of 2022 requires OIG to annually report (1) the number of suspected violations of the Act reported; (2) the number of investigations; (3) the status and outcomes of such investigations; and (4) any recommended actions to improve the programs and operations of such agency.

OIG performed a review of Fiscal Year 2023 records which resulted in no reportable instances of human trafficking as is required by the Trafficking Victims Prevention and Protection Reauthorization Act of 2022.



# **Appendix 3 - Reporting Table**

New citation	New requirement (NDAA for fiscal year 2023, sec. 5273)	Page number
(a)(1)	a description of significant problems, abuses, and deficiencies relating to the administration of programs and operations of the establishment and associated reports and recommendations for corrective action made by the Office	12-28
		Table A
(a)(2)	an identification of each recommendation made before the reporting period, for which corrective action has not been completed, including the potential costs savings associated with the recommendation	Oversight.gov  HUD OIG Open  Recommendations  Dashboard
(a)(3)	A summary of significant investigations closed during the reporting period.	12-28
(a)(4)	an identification of the total number of convictions during the reporting period resulting from investigations	<u>6</u>
(a)(5)	information regarding each audit, inspection, or evaluation report issued during the reporting period, including (A) a listing of each audit, inspection, or evaluation; (B) if applicable, the total dollar value of questioned costs (including a separate category for the dollar value of unsupported costs) and the dollar value of recommendations that funds be put to better use, including whether a management decision had been made by the end of the reporting period	Appendix 1 Table B Table C HUD OIG Open Recommendations Dashboard
(a)(6)	information regarding any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period	Table D
(a)(7)	the information described under section 804(b) of the Federal Financial Management Improvement Act of 1996	Appendix 2
(a)(8)	(A) an appendix containing the results of any peer review conducted by another Office of Inspector General during the reporting period; or (B) if no peer review was conducted within that reporting period, a statement identifying the date of the last peer review conducted by another Office of Inspector General;	<u>36</u>
(a)(9)	list of any outstanding recommendations from any peer review conducted by another Office of Inspector General that have not been fully implemented, including a statement describing the status of the implementation and why implementation is not complete;	<u>36</u>
(a)(10)	a list of any peer reviews conducted by the Inspector General of another Office of the Inspector General during the reporting period, including a list of any outstanding recommendations made from any previous peer review (including any peer review conducted before the reporting period) that remain outstanding or have not been fully implemented;	<u>36</u>



New citation	New requirement (NDAA for fiscal year 2023, sec. 5273)	Page number
(a)(11)	statistical tables showing  (A) the total number of investigative reports issued during the reporting period;  (B) the total number of persons referred to the Department of Justice for criminal prosecution during the reporting period;  (C) the total number of persons referred to State and local prosecuting authorities for criminal prosecution during the reporting period; and  (D) the total number of indictments and criminal informations during the reporting period that resulted from any prior referral to prosecuting authorities;	Appendix 2
(a)(12)	a description of the metrics used for developing the data for the statistical tables under paragraph (11);	Appendix 2
(a)(13)	a report on each investigation conducted by the Office where allegations of misconduct were substantiated involving a senior Government employee or senior official (as defined by the Office) if the establishment does not have senior Government employees	None
(a)(14)	<ul> <li>(A) a detailed description of any instance of whistleblower retaliation, including information about the official found to have engaged in retaliation; and</li> <li>(B) what, if any, consequences the establishment actually imposed to hold the official described in subparagraph (A) accountable;</li> </ul>	None Appendix 2
(a)(15)	information related to interference by the establishment, including -  (A) a detailed description of any attempt by the establishment to interfere with the independence of the Office, including—  (i) with budget constraints designed to limit the capabilities of the Office; and  (ii) incidents where the establishment has resisted or objected to oversight activities of the Office or restricted or significantly delayed access to information, including the justification of the establishment for such action; and  (B) a summary of each report made to the head of the establishment under section 6(c)(2) during the reporting period;	None Appendix 2
(a)(16)	Detailed descriptions of the particular circumstances of each - (A) Inspection, evaluation, and audit conducted by the Office that is closed and was not disclosed to the public; and (B)Investigations conducted by the office involving a senior government employee that is closed and not disclosed to the public.	Appendix 2



## Appendix 4 - Acronyms and Abbreviations

**2016 Appropriation**—Consolidated Appropriations Act, 2016

ACC—annual contributions contract

**CARES Act**—Coronavirus Aid, Relief, and Economic Security Act

**CDBG**—Community Development Block Grant

**CDBG-DR**—Community Development Block Grant Disaster Recovery

CFR—Code of Federal Regulations

**CoC**—Continuum of Care

COVID-19—coronavirus disease 2019

**CPD**—Office of Community Planning and Development

**DEO**—Department of Economic Opportunity

**DHS**—U.S. Department of Homeland Security

**DOE**—U.S. Department of Energy

**ESG-CV**— Emergency Solutions Grant CARES Act

**FEMA**—Federal Emergency Management Agency

**FFMIA**—Federal Financial Management Improvement Act

**FHA**—Federal Housing Administration

**FISMA**—Federal Information Security Modernization Act of 2014

FR—Federal Register

**Ginnie Mae**—Government National Mortgage Association

**HCV**—Housing Choice Voucher

**HUD**—U.S. Department of Housing and Urban Development

IG--Inspector General

**IS**—information security

IT—information technology

MTW-Moving to Work

NDAA—National Defense Authorization Act

**NSPIRE**—National Standards for the Physical Inspection of Real Estate

**NOFO**—notice of funding opportunities

OCFO-Office of the Chief Financial Officer

**OFO**—Office of Field Operations

**OIG**—Office of Inspector General

**OMB**—Office of Management and Budget

**ONAP**—Office of Native American Programs

PBRA—Project-Based Rental Assistance

PHA—public housing agency

PIH—Office of Public and Indian Housing

**PIIA**—Payment Integrity Improvement Act of 2019

**REAC**—Real Estate Assessment Center

**SAR**—Semiannual Report to Congress

SFHA—special flood hazard area

**SOP**—standard operation procedures

TBRA—Tenant-Based Rental Assistance

TR12—Technical Release 12

**U.S.C.**—United States Code

**WPC**—Whistleblower Protection Coordinator



# **Appendix 5 - HUD OIG Directory**

#### Office of Audit

HEADQUARTERS	Washington, DC	202-708-0364
HEADQUARTERS	washington, DC	202 700 0304
FAIR HOUSING AUDIT DIVISION	Boston, MA	617-994-8380
	Hartford, CT	860-240-9739
	Philadelphia, PA	215-656-0500
	Baltimore, MD	410-962-2520
	Pittsburgh, PA	412-644-6428
	Richmond, VA	800-842-2610
	,	
SINGLE FAMILY HOUSING	New York, NY	212-264-4174
(ORIGINATIONS)-MULTIFAMILY	Buffalo, NY	716-551-5755
INSURANCE AUDIT DIVISION	Newark, NJ	973-622-7900
PORTIONS OF AUDIT OPERATIONS	Atlanta, GA	404-331-3369
	Miami, FL	305-536-5387
RENTAL ASSISTANCE-SAFE AND	Chicago, IL	312-913-8499
AFFORDABLE HOUSING AUDIT DIVISION	Columbus, OH	614-280-6138
	Detroit, MI	313-226-6190
DISASTER RECOVERY AUDIT DIVISION	Fort Worth, TX	817-978-9309
	Baton Rouge, LA	225-448-3975
	Houston, TX	713-718-3199
	New Orleans, LA	504-671-3000
	San Juan, PR	787-766-5540
GINNIE MAE-SINGLE FAMILY HOUSING	Kansas City, KS	913-551-5870
(SERVICING) AUDIT DIVISION	Denver, CO	303-672-5475
	St. Louis, MO	913-551-5870
GRANTS MANAGEMENT	Los Angeles, CA	213-894-8016
	Phoenix, AZ	602-379-7100
	San Francisco, CA	415-489-6400

#### Office of Evaluation

HEADQUARTERS	Washington, DC	evaluations@hudoig.gov



## Office of Investigation

HEADQUARTERS	Washington, DC	202-708-0390
NORTHEAST REGION	Boston, MA	617-994-8450
	Buffalo, NY	716-646-7105
	Hartford, CT	860-240-4800
	Newark, NJ	973-776-7342
	New York, NY	212-264-8264
MID-ATLANTIC REGION	Alexandria, VA	206-498-6461
WIID-ATLANTIC REGION	Baltimore, MD	410-962-2520
	Cleveland, OH	216-357-7800
	Columbus, OH	
	-	614-280-6137
	Indianapolis, IN Philadelphia, IL	317-226-6303 215-430-6758
	Pittsburgh, PA	412-644-6598
	Richmond, VA	804-771-2100
	Ricilliona, VA	804-771-2100
SOUTHEAST REGION	Atlanta, GA	404-331-5001
	Birmingham, AL	205-731-2630
	Miami, FL	305-536-3087
	San Juan, PR	787-766-5872
	Tampa, FL	813-596-5764
MIDWEST REGION	Chicago, IL	312-353-4196
	Detroit, MI	313-226-7900
	Kansas City, KS	913-551-5866
	St. Louis, MO	314-539-6278
SOUTH CENTRAL REGION	Baton Rouge, LA	225-448-3941
SOUTH CENTRAL REGION	Fort Worth, TX	817-978-5440
	Houston, TX	713-718-3097
	New Orleans, LA	504-671-3700
	New Orleans, LA	504-071-3700
WESTERN REGION	Denver, CO	303-672-5350
	Los Angeles, CA	213-894-8000
	Phoenix, AZ	602-379-7251
	San Francisco, CA	415-489-6400

Report fraud, waste, and mismanagement in HUD programs and operations by Calling the HUD OIG hotline: 1-800-347-3735 Visiting online at

https://www.hudoig.gov/hotline

www.hudoig.gov

**SAR 90**