



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE of INSPECTOR GENERAL
QUARTERLY RECAP

A Message from the Inspector General



I am pleased to share the U.S. Department of Housing and Urban Development (HUD) Office of Inspector General's (OIG) Quarterly Recap. In addition to our regular updates, this newsletter provides updates about HUD OIG's recently issued reports, newly announced work, featured highlights from the Inspector General, press releases from recent investigations, and more.

We appreciate your readership as we continue to prioritize positive outcomes for HUD by doing the right work at the right time. If you have questions or want to learn more about our oversight work, contact us at oigmediarelations@hudoig.gov.

Rae Oliver Davis

Rae Oliver Davis | INSPECTOR GENERAL

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HUD Inspector General **IN THE NEWS**

Congressional Testimony

On Wednesday, September 18th Inspector General Oliver Davis testified before the House Appropriations Transportation, Housing and Urban Development, and Related Agencies Subcommittee (THUD). She was joined at the witness table by the IGs from the Department of Transportation and AMTRAK. The subcommittee invited the Inspector General to discuss her views on HUD programs, OIG's oversight strategies, and the great work of HUD OIG.

- [Please read the IG's testimony by clicking here.](#)
- [Please click here to view a recording of the hearing.](#)

Community Outreach



The OIG team with Team USAO-New Jersey

In July, the IG joined U.S. Attorney Philip Sellinger in penning an [op-ed](#) highlighting their partnership and commitment to pursue criminal and civil prosecution and penalties for those who sexually assault or harass HUD tenants. The op-ed compliments the IG's initiative launched in 2023 to combat sexual misconduct in housing. Since that time HUD OIG has conducted myriad training and community outreach events with U.S. Attorney's Offices across the country designed to build direct connections with stakeholders in the USAOs and within the communities reliant upon HUD's efforts, and to protect tenants from predatory landlords and others with authority over their housing.



The OIG team with Team USAO-Eastern District of Virginia

The IG also continued cohosting community outreach events focused on combatting sexual misconduct in housing and addressing environmental hazards like lead. This quarter the IG joined U.S. Attorney Sellinger on July 18 at the U.S. Attorney's Office in Newark, followed on September 16 in Richmond, Virginia with U.S. Attorney Jessica Aber.

These events provided the opportunity to communicate directly with representatives from organizations who routinely work with vulnerable populations most likely to be impacted by environmental injustices, such as lead paint in their homes, or who are subjected to sexual harassment in housing by their landlords, property managers, or others with control over housing. The organizations represented included legal services offices, fair housing organizations, civil rights groups, shelters, and social service organizations and advocates.

- [Click here to read the press release for the Newark, New Jersey event.](#)
- [Click here to read the press release for the Richmond, Virginia event.](#)

HUD OIG's Office of Investigation Highlights

False Statements

On August 14, 2024, an HCVP participant, was sentenced to 3 years of probation and ordered to pay \$16,201 in restitution to HUD OIG for her role in making false statements. The defendant made allegations that her landlord racially discriminated against her and was evicting her for being African American. The defendant provided text messages and a voicemail that she claimed were from her landlord as examples of the racial discrimination. The investigation revealed that the defendant lied to her attorney and investigators and fabricated the communications between her and her landlord, ultimately determining that no racial discrimination occurred.

False Claims Act

On July 12, 2024, a landlord and his property management company agreed to pay \$570,000 to resolve allegations that they violated the False Claims Act related to their participation in HUD's Housing Choice Voucher Program (HCVP). From January 1, 2017, through December 31, 2020, the defendant allegedly, regularly charged HCVP tenants more than unassisted tenants in comparable properties. These overcharges arose, in part, from the landlord's engagement in a prohibited quid pro quo sexual relationship with an unassisted tenant in which he made an unwelcome proposal to lower that tenant's monthly rental payments in exchange for sex. In doing so, the defendant overcharged the HCVP tenants whose rent was higher than this unassisted tenant, whose rent was regularly reduced.

- [Read the press release >](#)

On August 26, 2024, a local municipality agreed to pay more than \$38.2 million to resolve allegations that it knowingly failed to meet federal accessibility requirements when it sought and used HUD grant funds for multifamily affordable housing. In 2017, the United States filed a complaint in a whistleblower action filed under the False Claims Act alleging that for over a decade, the local municipality failed to follow federal accessibility laws when building and rehabilitating affordable multifamily properties, failed to make its affordable multifamily housing program accessible to people with disabilities, and failed to maintain a publicly available list of accessible units and their accessibility features.

- [Read the press release >](#)



On August 26, 2024, a landlord has agreed to pay a \$15,200 settlement to resolve allegations that he submitted false claims to a housing authority after receiving side payments more than the approved monthly rent from a low-income tenant participating in the HCVP. HUD provides this funding through local public housing agencies, which establish the total monthly rent due to landlords of HCVP tenants. HUD pays the housing subsidy directly to landlords and in return, landlords agree to comply with certain program requirements, including that they will not charge HCVP tenants rent exceeding the amount set by the public housing agency. Despite this restriction, the defendant demanded and received side payments from a HCVP tenant, who brought a lawsuit against the defendant under the whistleblower provisions of the False Claims Act.

- [Read the press release >](#)

Public Corruption

On August 6, 2024, a former Executive Director for a Housing Authority was sentenced to 5 years of probation and ordered to pay restitution in the amount of \$48,930 joint and severally with a co-defendant to the Housing Authority for her role in committing grand larceny and corrupting the government. Between 2016 and 2022, the defendant made purchases using the Housing Authority's credit cards and other accounts to make unauthorized personal purchases for personal items and expenses.

- [Read the press release >](#)

Mortgage Fraud

On July 29, 2024, a former loan officer was sentenced to 18 months in prison, 3 years of supervised release, and ordered to pay restitution in the amount of \$65,302 to the Federal Housing Administration (FHA) for his role in committing false. Evidence at trial proved that the defendant fraudulently obtained a \$223,870 FHA-insured mortgage from his then-employer, lied to investigators about his application for the FHA-insured mortgage, and denied submitting false bank statements with his loan application. The defendant provided false bank statements and a falsified Internal Revenue Service tax transcript to obtain his mortgage.

- [Read the press release >](#)

Housing Assistance Fraud

On August 2, 2024, a Housing Choice Voucher Program participant, was sentenced to 18 months in prison, 3 years of supervised release, and ordered to pay restitution in the amount of \$125,753. for her role in committing theft of federal benefits. From 2014 to 2021, the defendant received benefits from four different federal programs intended to benefit eligible persons in need, including the HCVP subsidy funded by HUD. From approximately September 2016 through September 2018, the defendant operated as a landlord, collecting rental income from her residence. This income was not reported to the Housing Authority as required by HUD. Instead, the defendant falsely reported to the Housing Authority that her children were living in her residence when in fact they were living with relatives at various times from 2015 through 2021.

- [Read the press release >](#)





On September 11, 2024, a defendant was sentenced to 1 year in prison and ordered to pay restitution in the amount of \$341,455 to HUD for his role in committing theft of government property and aiding and abetting. Between approximately August 2006 and February 2020, the defendant wrongfully claimed \$341,455 in Section 8 housing subsidies by falsely reporting that he did not own his residence but was renting the home from a Russian national to whom he made payments. He also admitted that he opened several bank accounts, including in the Russian national's name, and used these bank accounts to conceal his use of the falsely obtained Section 8 subsidies.

- [Read the press release >](#)

HUD OIG's Recently Issued Oversight Work

[FHEO Faces Challenges in Completing Investigations Within 100 Days](#)

HUD OIG audited HUD's Office of Fair Housing and Equal Opportunity's (FHEO) challenges in completing housing discrimination investigations within 100 days. We found that FHEO faces several challenges in completing investigations within 100 days for Title VIII complaints, including (1) limited staffing and training, (2) staff workload, (3) complexity of the case work, (4) uncooperative or unresponsive parties, and (5) inconsistent review processes with the Office of General Counsel (OGC). Aware of these challenges, FHEO took steps to address its limited staffing and increase the availability of training. However, FHEO does not have control over the complexity of the cases it receives and whether the parties to each case are cooperative or responsive. Despite being unable to control all the factors that lead to a timely investigation, FHEO has opportunities to review its investigative processes across regions to make processes more efficient and increase the number of timely outcomes.

[HUD Has Met the Responsibilities of the Geospatial Data Act of 2018 During the Implementation Phase](#)

We audited HUD's efforts to meet the geospatial data requirements of The Geospatial Data of 2018 which governs the collection, production, acquisition, maintenance, distribution, use, and preservation of

geospatial data of covered agencies, including HUD. Two previous audits during fiscal years 2020 and 2022 identified a lack of adequate resources as a recurring challenge that prevented HUD from fully meeting its responsibilities under the Act. However, this year, OIG found HUD now has the necessary resources to meet the responsibilities and implement the geospatial program. In addition, HUD successfully executed a formal 5-year contract for the management of its Geocode Services Center, which is used to help meet geospatial objectives and responsibilities. As a result, HUD is meeting the responsibilities and is positioning itself to meet the responsibilities stated in the Act once the implementation phase ends.

HUD Grantees Need to Enhance Monitoring of ESG CARES Act Subrecipients

HUD OIG audited HUD and its grantees' monitoring of subrecipients and contractors in HUD's Emergency Solutions Grants Coronavirus Aid, Relief, and Economic Security Act (ESG-CV) program to assess subrecipient monitoring in the program. ESG and ESG-CV grantees often rely on subrecipients and contractors to carry out ESG-CV-funded activities on behalf of the grantees and are required to monitor subrecipients to ensure that the purpose of the grant funds awarded is achieved and funds are spent on only eligible applicants and activities. HUD is responsible for ensuring that grantees are performing this oversight. OIG found that 87 percent of ESG-CV grantees provided funds to subrecipients, and of that group 84 percent reported the pandemic affected their ability to effectively monitor subrecipients. The ESG-CV funding represented a 1,379 percent increase to the regular 2020 annual ESG appropriation. These factors place an increased importance on HUD's Office of Community Planning and Development's (CPD) monitoring how well its grantees, in turn, monitor subrecipients and contractors.

HUD's Office of Fair Housing and Equal Opportunity is Making Progress in Addressing Civil Rights Compliance Review Challenges

HUD OIG audited FHEO's process for conducting civil rights compliance reviews. FHEO's operational readiness to carry out robust compliance reviews is critical to HUD's goals to advance equity and support underserved communities. Based on our survey, FHEO is making progress in addressing several challenges in conducting civil rights compliance reviews, including (1) limited staff and resources, (2) the need for trained and experienced staff, (3) a lack of centralized guidance for conducting compliance reviews, (4) a lack of guidance for making strategic target selections, and (5) structural barriers that affect compliance reviews. With increased resources and capacity, improved guidance, increased authority to determine and interpret civil rights related program requirements within the Department, and a commitment from all program offices, FHEO's compliance review function can be more effective in promoting compliance with civil rights laws.

The Boston Housing Authority Did Not Always Comply with HUD's Requirements for Its Housing Choice Voucher Program Units

HUD OIG audited the Boston Housing Authority's compliance with HUD's requirements for its Housing Choice Voucher (HCV) Program units, focusing on housing quality standards and monitoring and data collection requirements for cases of children with elevated blood lead levels (EBLL). We found that the Authority did not always ensure





that its HCV Program units met HUD’s housing quality standards and did not consistently stop payments to owners who failed to correct unit deficiencies. We also found the Authority did not comply with HUD’s monitoring and data collection requirements of the Lead Safe Housing Rule for cases of children with elevated blood lead levels (EBLLs).

The Housing Authority of the City of Los Angeles Did Not Adequately Manage Lead-Based Paint in Its Public Housing

HUD OIG audited the Housing Authority of the City of Los Angeles’ management of lead-based paint and lead-based paint hazards in its public housing units. HUD OIG found the Authority appropriately managed a case of a child with an EBLL. It also maintained lead-based paint inspection reports for the 69 units reviewed. However, the Authority did not adequately manage lead-based paint and lead-based paint hazards in its public housing units, and lacked adequate policies, procedures, and controls to ensure that it appropriately managed its housing units that contained lead-based paint. Specifically, for all 69 units reviewed, the Authority did not complete visual assessments in a timely manner. The Authority also did not conduct risk assessments and reevaluations for lead-based paint stabilization projects at 5 of the 10 developments reviewed, which included work at approximately 200 buildings.

HUD OIG Review of Puerto Rico’s Electrical System Enhancement Efforts

HUD OIG reviewed the Puerto Rico Department of Housing’s (PRDOH) Electrical Power System Enhancements and Improvements programs to provide (1) background and funding information, (2) an update on the status of the programs and their progress, and (3) other relevant program information for interested stakeholders including Congress and the public. HUD OIG found that PRDOH budgeted most of its \$1.93 billion disaster recovery funds for its two main electrical grid programs: (1) \$500 million for the Energy Grid Rehabilitation and Reconstruction Cost Share Program (ER1), and (2) \$1.3 billion for the Electrical Power Reliability and Resilience Program (ER2). PRDOH launched both the ER1 and ER2 electrical grid programs in 2023, and both programs are in their early implementation stages. As of July 12, 2024, PRDOH had spent less than 1 percent of its total budget for both programs (\$179,760 of \$1.93 billion). For ER1, PRDOH is working with its partners including the Central Office for Recovery, Reconstruction, and Resilience (COR3) and the Puerto Rico Electric Power Authority (PREPA). For ER2, PRDOH opened and closed its competitive application process and expects to award funds by the end of 2024. In addition, on August 5, 2024, it announced 20 ER2 projects and expects to finalize the selection and award of the remaining strategic projects by the end of the first quarter of 2025.

HUD Addressed Multifamily Mortgage Application Processing Delays, but Additional Action Is Needed To Manage Future Backlogs

HUD OIG audited the Department’s Office of Multifamily Housing Programs’ efforts to address multifamily mortgage application processing delays. We conducted this audit to assess HUD’s efforts for receiving and screening applications and assigning them to underwriters. We found that HUD took steps to address delays in assigning applications to underwriters, but its methods and systems could be improved to help it manage applications and future challenges. We also found that although HUD eliminated a nationwide backlog in November 2022, it was unable to transition successfully to a state-of-the-art processing platform. As a result, HUD still uses multiple systems, email, and other manual methods to process applications. We found this creates a future risk that HUD cannot process applications as quickly and effectively as possible. With a more integrated system and a plan for which methods will be used when applications exceed underwriter capacity, HUD can more easily identify, monitor, and address processing delays; evaluate its performance and processes; and manage future challenges, such as fluctuations in application volume.

The City and County of Honolulu Should Enhance Its Fraud Risk Management Practices for Its ESG CARES Act Program

HUD OIG audited the City and County of Honolulu’s Department of Budget and Fiscal Services’ and Department of Community Services’ (City) fraud risk management practices for its Emergency Solutions Grants Coronavirus Aid, Relief, and Economic Security Act (ESG CARES Act) program with the objective of assessing the maturity of the City’s fraud risk management framework that encompasses control activities to prevent, detect, and respond to fraud. The audit found that the City’s approach to fraud was reactive, not proactive, and did not include robust anti-fraud practices. The City had some specific anti-fraud controls but did not include best practices, such as the use of data analytics to identify potential fraud. The audit also revealed that without a formal fraud risk management framework in place, there is an increased risk of fraud being undetected and unreported. These deficiencies resulted in the lowest desired maturity goal state-- Ad Hoc-- for the City’s anti-fraud initiatives and put more than \$25 million in ESG-CV funds administered by the City at a greater risk of fraud.

The California Department of Housing and Community Development Should Improve Its Fraud Risk Management Practices for Its ESG CARES Act Program

HUD OIG audited the California Department of Housing and Community Development (HCD) with the objective of evaluating HCD’s fraud risk management practices for its Emergency Solutions Grants Coronavirus Aid, Relief, and Economic Security Act (ESG CARES Act) program and assessing the maturity of its efforts to prevent, detect, and respond to fraud. The audit found that HCD was not adequately prepared to prevent, detect, and respond to fraud due to the lack of focus it placed on identifying fraud





risks and establishing a robust fraud risk management framework. HCD established a departmentwide enterprise risk management framework; however, it was not robust enough to proactively identify fraud risks, and it was not developed with leading industry standards and best practices. Additionally, HCD did not conduct a fraud risk assessment and has not developed an anti-fraud strategy to prioritize and mitigate fraud risks. These deficiencies resulted in the lowest desired maturity goal state— Ad Hoc-- for HCD’s anti-fraud initiatives and put more than \$319.5 million in homelessness assistance funding at an increased risk of fraud.

HUD’s FHA Appraiser Roster is Generally Reliable but Opportunities to Improve Data Management Exist

HUD OIG audited HUD’s management of its FHA appraiser roster to determine whether the roster was accurate and reliable. We selected this review because a prior audit identified weaknesses related to roster oversight and because this topic aligns with HUD’s strategic goals related to promoting home ownership and strengthening its internal capacity, as well as increased interest in the appraisal process. HUD’s FHA appraiser roster was generally reliable. HUD’s system controls prevented ineligible appraisers from being assigned appraisals on FHA-insured properties. Though it did not affect the assignment of appraisals, HUD could improve its data management by timely removing ineligible appraisers with expired licenses or disciplinary actions within specified timeframes, and better maintain historical information and supporting documentation. Additionally, HUD’s processes, policies, procedures, and regulations for maintaining the appraiser roster did not consistently align, were not clear, or were undocumented. HUD had begun to make several system enhancements to address the concerns identified, and it should continue to improve its guidance and data management to help ensure the integrity of the roster.

The Cuyahoga Metropolitan Housing Authority Did Not Have Adequate Oversight of Lead-Based Paint in Its Public Housing

HUD OIG audited the Cuyahoga Metropolitan Housing Authority’s management of lead-based paint in its public housing program based on our assessment of the risks of lead-based paint in public housing. We found the Authority did not comply with HUD’s reporting and verification requirements for cases of

children with EBLLs. Specifically, it did not report all 10 confirmed cases of children with an EBLL to HUD or notify HUD that it was unable to verify 4 additional cases. Further, for 6 of 10 of the confirmed cases, the Authority did not complete adequate environmental investigations to appropriately determine the source of each child’s lead poisoning. The Authority also did not adequately manage lead-based paint and lead-based paint hazards in its public housing. Additionally, we reviewed a sample of 77 units, consisting of 67 units with lead-based paint and 10 units that had a child with a confirmed EBLL, and determined that the Authority did not (1) perform visual assessments for 59 units (nearly 77 percent) within the required timeframe, including 9 units that had a child under 6 years of age with a reported EBLL and (2) provide accurate lead disclosures to tenants for 38 units (nearly 50 percent), including 5 units that later had a child with a reported EBLL. Lastly, we reviewed three units for which a reevaluation was required, since the lead-based paint inspection for those units identified deteriorated paint and, thus, required hazard reduction, and determined that the Authority did not reevaluate those three units every 2 years as required.

The Columbus Metropolitan Housing Authority Did Not Always Comply With HUD’s Requirements for Its Housing Choice Voucher Program Units

HUD OIG audited the Columbus Metropolitan Housing Authority’s Housing Choice Voucher (HCV) Program. The audit was initiated based on our assessment of risks associated with public housing agencies’ HCV Program units and recent media attention and public concern about the conditions of subsidized housing properties. We found the Authority did not always ensure that its HCV Program units met HUD’s housing quality standards (HQS). Specifically, we reviewed a sample of 84 units that had passed a recent HQS inspection and determined that 48 units had 248 deficiencies. More than 56 percent of the 48 units had 67 deficiencies that existed before the Authority’s last inspection. In addition, the Authority did not consistently stop housing assistance payments (HAP) to owners for uncorrected unit deficiencies. It also did not ensure that its contractors (1) categorized deficiencies as life threatening, requiring corrective actions within 24 hours and (2) conducted the required number of quality control inspections in 2022. Further, the Authority did not comply with HUD’s reporting and data collection requirements of the Lead Safe Housing Rule (LSHR) for cases of children with elevated blood lead levels (EBLL).



HUD OIG’s Recently Announced Work

New York City Department of Social Services ESG CARES Act Improper Payments

HUD OIG is auditing a New York-based grantee’s Coronavirus, Aid, Relief, and Economic Security (CARES) Act, Emergency Solutions Grants (ESG-CV) program. The CARES Act provided nearly \$4 billion in special ESG funds to grantees to prevent, prepare for, and respond to the coronavirus pandemic and supports activities, such as, rapid re-housing, homelessness prevention programs, and emergency shelters for people experiencing homelessness. Our objective is to determine if improper payments exist in the grantee’s program.



Puerto Rico Community Energy and Water Resilience Installations Program

HUD OIG is auditing Puerto Rico's Community Energy and Water Resilience Installations Program (CEWRI). HUD awarded Puerto Rico over \$20 billion dollars in CDBG-DR funding after the impact of Hurricanes Irma and Maria. Of the total award, \$395 million was budgeted to the CEWRI program. Our objective is to determine to what extent did the CEWRI program address the energy and water system vulnerabilities of its low-and-moderate income participants.

The U.S. Department of Housing and Urban Development's Reporting of Elevated Blood Lead Levels in HUD-Assisted Multifamily Properties Receiving Section 8 Project-Based Rental Assistance

HUD OIG is conducting an evaluation of HUD's reporting of elevated blood lead levels (EBLL) in HUD-assisted Multifamily properties receiving Section 8 project-based rental assistance. Our objective is to (1) determine how the Office of Multifamily Housing tracks and reports EBLL cases in HUD-assisted Multifamily properties receiving Section 8 project-based rental assistance.

Review of HUD's Monetary Closed Audit Recommendations

HUD OIG is reviewing monetary audit recommendations that were closed by HUD under the new Closed Collection process. Upon receipt of a valid repayment agreement, HUD closes the recommendation but is still responsible for maintaining repayment documentation and ensuring adherence to the repayment agreement. Our review objective is to determine if HUD has established a repayment agreement and is receiving payments in accordance with the repayment agreement from entities for closed monetary audit recommendations.

HUD Oversight of Lead Grants

HUD OIG is auditing HUD's oversight of Lead-Based Paint Hazard Control (LBPHC) and Lead Hazard Reduction Demonstration (LHRD) grant programs. Between fiscal years 2020 to 2024, HUD committed more than \$200 million in grant funds as part of addressing lead based in targeted communities. Our objectives are to assess (1) HUD's evaluation of grantees' capacity to manage grant funds and (2) HUD's tracking and monitoring of grants performance goals for its LBPHC and LHRD grants.

The Changing Hazard Insurance Market and FHA

HUD OIG is auditing the changing hazard insurance market on FHA borrowers and FHA. Our review will involve the review of hazard insurance cost data from January 1, 2018, through July 31, 2024, in Florida, Texas, Louisiana, and California overlaid with FEMA high-risk disaster maps and risk exposure associated with FHA insured homes in those states. Our objective is to assess the impact of the changing hazard insurance market on FHA borrowers and the Mutual Mortgage Insurance Fund.

A California-Based Grantee ESG CARES Act Improper Payments Audit

HUD OIG is auditing a California-based grantee's Coronavirus, Aid, Relief, and Economic Security (CARES) Act, Emergency Solutions Grants (ESG-CV) program. The CARES Act provided nearly \$4 billion in special ESG funds to grantees to prevent, prepare for, and respond to the coronavirus pandemic and supports activities, such as, rapid re-housing, homelessness prevention programs, and emergency shelters for people experiencing homelessness. Our objective is to determine if improper payments exist in the grantee's program.

Challenges FHA Borrowers Face in Foreclosure

HUD OIG is auditing barriers impacting borrowers who were attempting to avoid FHA foreclosures. There were 85,000 FHA foreclosures started in 2022 following the conclusion of the COVID-19 foreclosure moratorium. Our audit objective is to assess the challenges facing FHA borrowers trying to avoid foreclosure.

A Hawaii-Based Grantee ESG CARES Act Improper Payments Audit

HUD OIG is auditing a Hawaii-based grantee's Coronavirus, Aid, Relief, and Economic Security (CARES) Act, Emergency Solutions Grants (ESG-CV) program. The CARES Act provided nearly \$4 billion in special ESG funds to grantees to prevent, prepare for, and respond to the coronavirus pandemic and supports activities, such as, rapid re-housing, homelessness prevention programs, and emergency shelters for people experiencing homelessness. Our objective is to determine if improper payments exist in the grantee's program.

The U.S. Department of Housing and Urban Development Nondisclosure Agreements' Incorporation of Whistleblower Protections

HUD OIG is conducting an evaluation (1) to determine whether HUD's nondisclosure policies, forms, and agreements include the anti-gag provision specified in the Whistleblower Protection Enhancement Act (WPEA) of 2012; (2) to determine HUD's process to ensure its nondisclosure policies, forms, and agreements include the anti-gag provision as required by WPEA; and (3) to determine whether HUD posts the anti-gag provision on its agency website as required by WPEA.



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