



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

SEMIANNUAL REPORT TO CONGRESS

For the period October 1, 2020 to March 31, 2021

★★ OFFICE *of* ★★
INSPECTOR GENERAL
UNITED STATES DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT



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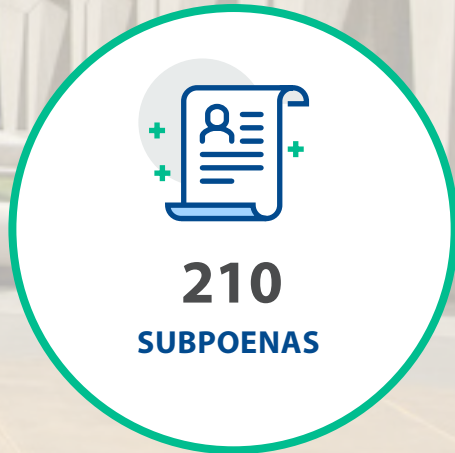
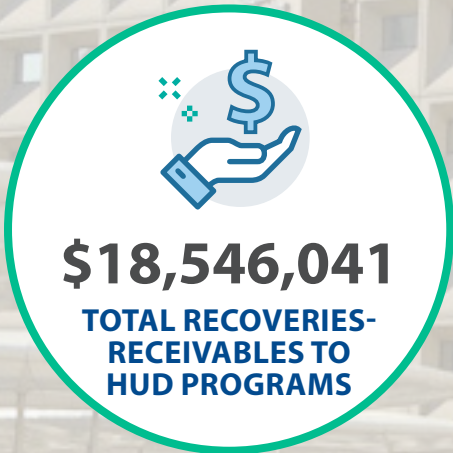
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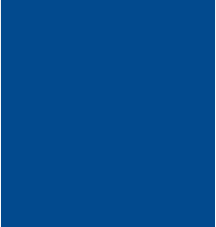


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HIGHLIGHTS

FOR THE PERIOD OCTOBER 1, 2020, TO MARCH 31, 2021





A MESSAGE FROM THE INSPECTOR GENERAL

It is with great pride that I submit the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General’s (OIG) Semiannual Report to Congress, which covers the period from October 1, 2020 to March 31, 2021.

We faced challenges during this period unlike any that we have seen before. My office demonstrated our ability to adapt and produce quality, timely reports to inform policymakers and the public, and we continued protecting HUD funds from fraud, waste, and abuse. During this period our audit and evaluation work resulted in the publication of 21 reports identifying over \$438 million in funds put to better use,

over \$12 million in questioned costs and \$90 million in collections. Our investigations during this period resulted in over \$18 million in recoveries for HUD programs.

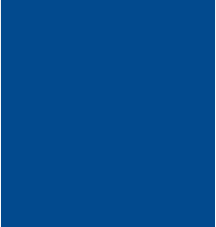
As the period closes, the fight against the COVID-19 pandemic continues and it will remain a central focus for HUD and my office. The assistance and relief provided through HUD’s pandemic response is crucial to the stability of American housing and communities. HUD was tasked with disbursing and overseeing more than \$12 billion in grant funding provided under the Coronavirus Aid, Relief, and Economic Stability (CARES) Act, as well as implementing program changes to provide relief

from evictions for renters and loan forbearance and foreclosure relief for homeowners. In March 2021, the passage of the American Rescue Plan (ARP) Act provided over \$10 billion through HUD programs to fund emergency housing vouchers, homeless assistance and supportive services, fair housing initiatives, and housing assistance and supportive services for Native Americans. As an active member of the Pandemic Response Accountability Committee or PRAC, the OIG helps promote transparency and accountability of these funds through our independent oversight.



Inspector General
Rae Oliver Davis





A MESSAGE FROM THE INSPECTOR GENERAL

During this period, we concluded several audits, evaluations, and investigations related to HUD’s pandemic response. We used agile approaches and limited-scope reviews to examine HUD’s communications with the public regarding eviction protections, the drawdown levels of CARES Act grants, key considerations from prior audits relevant to FHA’s implementation of forbearance requirements, and the pandemic-related challenges disaster-recovery grantees were facing.

We also initiated engagements focused on ensuring that timely and effective relief is provided to the intended recipients and those relief efforts are not undermined by fraud, waste, and abuse. We initiated

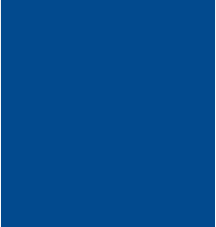
work during the period to examine mortgage loan servicers compliance with HUD’s forbearance requirements and HUD’s communications to homeowners about forbearance options. We also initiated work to review HUD’s administration of \$685 million in supplemental operating funds provided to public housing agencies to prevent, prepare for, and respond to the pandemic. Additionally, we are working jointly with the PRAC to assess HUD’s identification of fraud risks in over \$9 billion of CARES Act funding distributed through the Community Development Block Grant and Emergency Shelter Grant programs.

In addition to our pandemic work, we concluded a number of audits, evaluations, and investigations

focused on the health and safety of residents in HUD-assisted housing and protecting taxpayer funds. We identified that HUD needs to strengthen its approach for identifying HUD-assisted rental units near contaminated sites and mitigating resident exposure to those hazards. We also identified that the FHA needs to strengthen its controls to prevent ineligible mortgage loans on properties in special flood zones from becoming insured to prevent future losses to the FHA insurance fund. Based on the significant findings in that review, we initiated follow-on work in this area during the period to assess whether borrowers are maintaining flood insurance coverage.



Inspector General
Rae Oliver Davis



A MESSAGE FROM THE INSPECTOR GENERAL

Additionally, we continue to utilize the False Claims Act in partnership with HUD and the Department of Justice as primary tool for combating fraud in HUD programs, evidenced by an agreement reached with an FHA lender to pay nearly \$25 million to resolve allegations it knowingly submitting false claim to FHA for insurance benefits on defaulted mortgage loans.

My office has also prioritized oversight of HUD’s Office of Fair Housing and Equal Opportunity (FHEO), which plays a vital role in eliminating discrimination in housing. To that end, we initiated an audit to examine how FHEO and its partners process discrimination

complaints and determine whether full investigations are necessary. The OIG continued influencing positive change in HUD programs during this period through our open recommendations “tiger team” collaboration with the Offices of the Chief Financial Officer. This collaboration reduced the number open recommendations to 1,116 at the end of this reporting period, which was 179 fewer than the prior period. HUD has addressed many OIG recommendations in the information technology and financial management areas resulting in a positive impact on HUD’s mission and operations allowing HUD to improve its maturity in financial management and information security.

I want to express my sincere admiration to the staff of HUD OIG for their outstanding accomplishments and dedication. Throughout this challenging period, they demonstrated determination and excellence. Finally, I would like to thank you, our stakeholders, for your continued support and look forward to working together to further our efforts to improve housing opportunities for Americans nation-wide.

Rae Oliver Davis



Inspector General
Rae Oliver Davis

SNAPSHOT

Spotlight

Our Fiscal Year 2021 performance has helped us deliver for the U.S. Department of Housing and Urban Development (HUD), Congress, and our other stakeholders, including HUD communities nationwide. Our work has helped the Department achieve its mission to create strong, sustainable, inclusive communities and quality affordable homes for all. Our scale, reach, and activities range from efforts to identify and mitigate health risks to residents living in HUD-funded properties to providing oversight of relief efforts provided by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), as well as providing oversight to more than 300 of HUD’s programs and operations. This section draws attention to our reports and performance since October 1, 2020.





SNAPSHOT



OIG found that FHA insured at least 3,870 loans that closed in 2019, totaling \$940 million, which were not eligible for insurance because they were made for properties in flood zones without the required flood insurance coverage.

FHA Insured \$940 Million in Loans for Properties in Flood Zones Without the Required Flood Insurance

HUD’s Office of Inspector General (OIG) audited Federal Housing Administration (FHA)-insured loans that originated in calendar year 2019. OIG’s audit objective was to determine whether FHA insured loans that were ineligible for insurance because they did not have the required flood insurance coverage. The National Flood Insurance Act of 1968 (Public Law 90-448) established the National Flood Insurance Program (NFIP). NFIP is a Federal program that enables property owners in participating communities to purchase flood insurance as protection against flood losses, while requiring State and local governments to enforce floodplain management ordinances that aim to reduce future flood damage.

The Flood Disaster Protection Act of 1973 (Public Law 93-234) made the purchase of flood insurance mandatory for federally insured loans in special flood hazard areas (SFHA). The Biggert-Waters Insurance Reform Act of 2012 (Public Law 112-141) further amended the Federal flood insurance statutes to encourage private-sector participation. It did not apply to FHA-insured loans but, instead, applied to other types of loans. FHA’s current rules regarding the requirement to maintain flood insurance coverage on property located in an SFHA do not permit private flood insurance as an option to satisfy the purchase requirement. To qualify for FHA insurance, properties in an SFHA must be covered by NFIP insurance in an amount equal to either the outstanding balance of the mortgage, less estimated land costs, or the maximum amount of NFIP insurance available, whichever is less.





SNAPSHOT

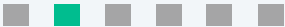


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FHA Insured \$940 Million in Loans for Properties in Flood Zones Without the Required Flood Insurance *(Continued)*

OIG found loans that either did not have the required flood policies or had policies that did not meet the minimum amount required by FHA guidance. These conditions occurred because FHA did not require underwriters to enter information into HUD systems to show compliance with Federal flood insurance regulations. Underwriters did not enter information into FHA’s system regarding whether an NFIP flood insurance policy was obtained or the coverage amount. They also did not enter the flood zone or the site value, both of which would be needed to determine whether insurance was required and, if so, the minimum coverage amount. FHA also did not have a control mechanism in place to prevent endorsement of loans that did not comply with the flood insurance requirement.

OIG recommended that FHA require lenders to provide evidence of sufficient flood insurance or execute indemnification agreements for the 43 loans in the statistical sample that did not have sufficient flood insurance at the time of the audit. OIG also recommended that FHA add to HUD databases the information necessary to ensure that the required flood insurance is obtained. **(Audit Report: 2021-KC-0002)**



SNAPSHOT



However, OIG identified several aspects of HUD’s communication to renters on its website and published guidance that could be strengthened and areas of the joint website that could be improved.

Opportunities Exist to Improve HUD’s Communication to Renters About Eviction Protections

As part of the CARES Act, OIG reviewed HUD’s communication to renters regarding the eviction moratorium found in Section 4024. The Section 4024 eviction moratorium protects millions of households residing in properties that participate in certain housing programs or have federally backed mortgage loans. These households include renters connected to HUD’s public housing and rental assistance programs as well as those who rent in FHA-insured single-family homes, FHA-insured multifamily properties, and other properties related to HUD programs. OIG’s objective was to highlight HUD’s progress and identify areas for improvement. OIG found that HUD provided critical information to many of these renters through its website and published guidance.

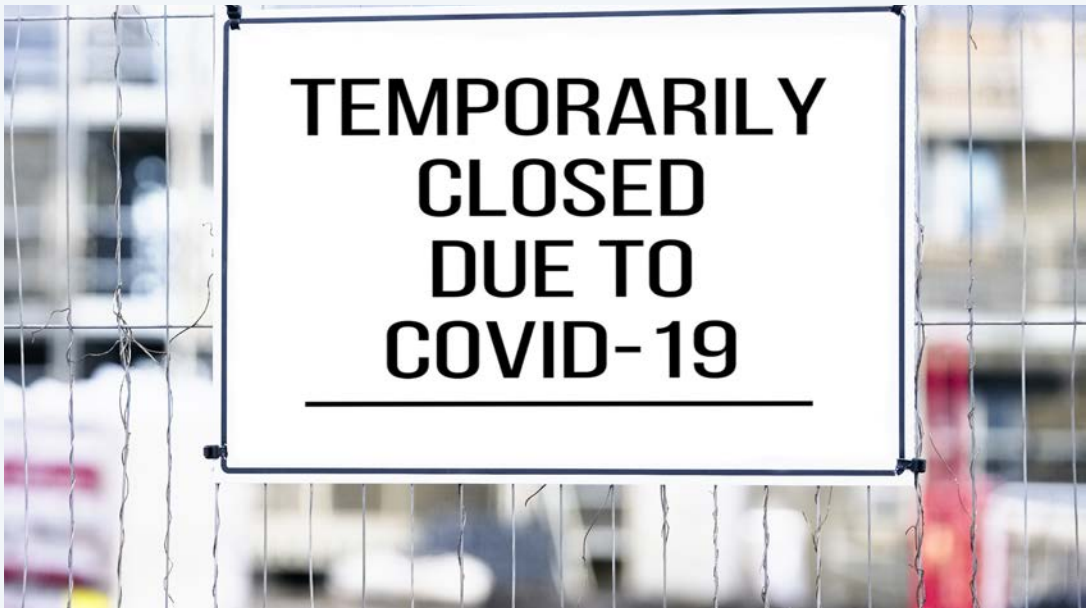
For example, (1) guidance for renters can be difficult to locate, does not cover all impacted renters, and does not consistently provide key information; (2) search tools and other information on its website do not help all impacted renters determine whether they are protected; and (3) HUD’s website and published guidance do not consistently inform renters about additional eviction protections available.

While the Section 4024 eviction moratorium expired on July 24, 2020,¹ it is still crucial that HUD have clear, complete, and accessible guidance available to help renters at a time when their health and financial stability may be at risk. If HUD maintains up-to-date and easily accessible information for all impacted renters, it will help to ensure that renters know their rights, maintain housing stability through the pandemic, and avoid homelessness. **(Audit Memorandum: 2021-NY-0801)**

¹ Mortgagee Letter 2021-05, published February 16, 2021, extends the foreclosure and eviction moratorium through June 20, 2021.



SNAPSHOT



Many HUD CDBG-DR grantees reported facing challenges with alternative systems-technology and communications with program participants, subrecipients, contractors, and local governments and reported substantial challenges with project construction delays and incurring additional costs due to State-ordered shutdowns and scarcity of materials.

HUD and Its CDBG-DR Grantees Have Experienced Challenges Related to the COVID-19 Pandemic

OIG completed a survey of the impact of the COVID-19 pandemic on HUD’s Community Development Block Grant Disaster Recovery (CDBG-DR) grantees to determine the challenges that HUD and its grantees are experiencing related to the COVID-19 pandemic and to help inform the Office of Community Planning and Development and Congress on the issues faced in responding to the pandemic. The survey focused on key questions regarding the grantees’ challenges and experiences with respect to their ability to monitor CDBG-DR activities, future challenges in administering the program as a result of the pandemic, additional support they will need to effectively administer the program, and whether HUD’s revised requirements address the challenges.

Other challenges reported by the grantees included adjusting to the technology for virtual monitoring, construction resources and lack of capacity, travel restriction impact on tourism-based project activities, fear of possible COVID-19 infection and case resurgence, telework and managing work-home balance, and ensuring having essential equipment and technology. OIG determined that there were eight recurring themes faced by CDBG-DR grantees and HUD officials during the COVID-19 pandemic. Although HUD’s assistance emerged as a recurring theme, grantees identified a range of actions and coordination efforts they received from HUD in response to the pandemic. OIG did not identify HUD assistance as a challenge but an opportunity for HUD to continue to cultivate its relationship with the grantees and collaborate with them to help them navigate and maintain continuity of operations during this emergency situation. OIG issued a memorandum, which contained no recommendations. **(Audit Memorandum: 2021-GA-0801)**





SNAPSHOT



“They also state that particular attention should be given to any proposed site on or in the general proximity of such areas as dumps, landfills, industrial sites, or other locations that contain hazardous wastes.”

Contaminated Sites Pose Potential Health Risks to Residents at HUD-Funded Properties

The West Calumet Housing Complex (WCHC), located in East Chicago, IN, is a housing development that opened on top of a former lead smelting plant in 1972. WCHC was built on the former site of Anaconda Lead Products and the International Lead Refining Company and downwind of the USS Lead facility, all part of the USS Lead Superfund site. Lead is one of the most commonly found hazards at Superfund sites. In 2009, the Environmental Protection Agency (EPA) put the USS Lead site on the National Priorities List for contamination cleanup. As of 2016, approximately 1,100 residents, about 680 of whom were children, resided in WCHC. On August 3, 2016, HUD officially ordered the relocation of WCHC’s residents due to lead contamination. The City of East Chicago began demolition of WCHC in 2018 and completed it by June 2019. OIG’s objectives were to determine (1) the circumstances surrounding the resident lead poisoning at WCHC, (2) what steps HUD has taken to determine the potential health risks posed to residents in HUD-funded properties by Superfund and non-Superfund sites contaminated with heavy metals, and (3) what HUD has done to mitigate these potential health risks.

HUD developed two environmental review regulations in response to the National Environmental Policy Act of 1969 (NEPA). The objective of NEPA was, in part, to stimulate the health and welfare of the people. NEPA also established a national policy that would encourage harmony between people and their environment and promoted efforts to prevent or eliminate damage to the environment. Both regulations state that it is HUD policy that “[a]ll property proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gasses, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property.”





SNAPSHOT



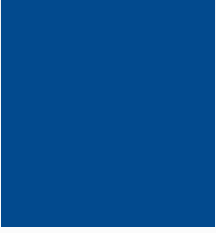
“They also state that particular attention should be given to any proposed site on or in the general proximity of such areas as dumps, landfills, industrial sites, or other locations that contain hazardous wastes.”

Contaminated Sites Pose Potential Health Risks to Residents at HUD-Funded Properties *(Continued)*

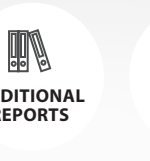
HUD’s Office of Environment and Energy, within the Office of Community Planning and Development, has overall departmental responsibility for policies and procedures that implement NEPA and related laws and authorities known as compliance factors.

HUD and other agencies missed multiple opportunities to identify site contamination at WHCH, resulting in residents’ continuing to live in unsafe conditions for decades, and inadequate oversight led to the lead poisoning of children. HUD would have become aware of lead contamination at WCHC sooner if HUD and the City of East Chicago had properly conducted environmental reviews or if better communication among Federal, State, and City authorities had occurred. HUD partnered with and relied on the EPA to identify and develop a mitigation strategy for contaminated HUD-funded properties. Since 2016, HUD and EPA have been working to update a list of HUD-funded properties on or near contaminated sites, and while HUD has taken steps to improve communication with EPA, it can do more with the information it receives to understand how contaminated sites might impact HUD-funded properties. OIG recommended that HUD develop and implement strategies to research properties and determine whether site contamination should be considered in future reviews and monitor those reviews. Also, OIG recommended that HUD monitor completed environmental reviews for properties identified as potentially contaminated to ensure that site contamination was appropriately considered. **(Evaluation Report: 2019-OE-0003)**





SNAPSHOT



Making an Impact

OIG’s oversight work results in recommendations to encourage improvements in the conduct of government programs and operations. This section highlights connections between OIG’s work and positive impact for HUD’s programs, operations, mission, and beneficiaries. While there are many factors that may cause programmatic change, OIG’s reviews and other work often play a role. This section draws attention to recommendations closed during this semiannual reporting period that have made a positive impact on HUD’s mission and operations.



SNAPSHOT



OIG’s fiscal year (FY) 2020 FISMA evaluation found that HUD consistently implemented the IT security metrics that are used to measure the maturity of HUD’s IT security program.

HUD Program Area: Office of the Chief Information Officer

HUD closed 27 recommendations associated with information technology (IT) and information security evaluations completed by HUD OIG. Some of those recommendations had been longstanding since 2014. Most of those recommendation impacted one of the eight Federal Information Security Modernization Act of 2014 (FISMA) domains. Three of the FISMA domains, including Risk Management, IT Security Training, and Incident Response, had maturity level improvements.

HUD’s maturity had been at the “defined” level since FY 2018 when all Federal agencies began conducting annual evaluations in accordance with the maturity model criteria. The concerted effort to close recommendations correlates to HUD’s increased maturity level. This is a stepping-stone toward HUD’s achieving the next maturity level of “managed and measurable,” which the Office of Management and Budget associates with an effective program.



SNAPSHOT



This work reflects the improvements HUD and its component entities have made in their financial management environment, which we have reported as one of HUD’s top management challenges for the last several years.

The Office of the Chief Financial Officer, Ginnie Mae, FHA

HUD closed 10 recommendations that focused on deobligating funds not needed, correctly accounting for and taking appropriate action to track and pursue funds owed to HUD, and recognizing unrecorded assets and liabilities related to leasehold improvements. The Government National Mortgage Association (Ginnie Mae), HUD’s component entity, also closed seven recommendations that focused on improving Ginnie Mae’s financial management governance, specifically in the areas of models used for its estimates and its financial systems.

Further, HUD closed three significant deficiencies and two instances of noncompliance with laws and regulations, Ginnie Mae closed two material weaknesses and one instance of noncompliance, and FHA closed one significant deficiency and reported no internal control findings or instances of noncompliance with laws and regulations in its audit report. Many of these findings represented longstanding deficiencies in HUD’s overall financial management environment. The work that HUD and its component entities have done over the past year, along with the closure of recommendations and internal control findings during this semiannual reporting period, have helped HUD and Ginnie Mae to achieve clean opinions on their financial statements for the first time in 8 years.

A clean opinion provides stakeholders of HUD’s financial statements with reasonable assurance that the information contained in HUD’s financial statements is accurate, which helps stakeholders make more informed decisions about HUD’s current operations and future needs. It also gives HUD more credibility with the public. Further, reducing material weaknesses and significant deficiencies in HUD’s controls is essential to building sound financial management. These improvements have allowed HUD to improve its financial management posture, based upon on the U.S. Department of the Treasury’s Financial Management Maturity Model.





AUDIT



5

KEY PROGRAM RESULTS



\$437,835,534

RECOMMENDED FUNDS PUT TO BETTER USE

INVESTIGATION



\$32,908,467

INVESTIGATIVE RECOVERIES



25

CONVICTIONS-PLEAS-
PRETRIAL
DIVERSIONS



13

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HIGHLIGHTS



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HOUSING

The Office of Housing plays a vital role for the nation’s homebuyers, homeowners, renters, and communities through its nationally administered programs. It includes Single Family Housing, Multifamily Housing, and the Federal Housing Administration (FHA), the largest mortgage insurer in the world. FHA singlefamily programs provide mortgage insurance to mortgage lenders that, in turn, provide financing to enable individuals and families to purchase, rehabilitate, or construct homes.

With the multifamily housing developments with the Office of Housing and Urban Development-held (HUD) or HUD-insured mortgages and the Office of Healthcare Programs, HUD subsidizes rents for low-income households, finances the construction or rehabilitation of rental housing, and provides support services for the elderly and disabled. Some of the highlights from this semiannual period are noted in this chapter.

HOUSING

OFFICE OF AUDIT

Key Considerations From Prior Audits of the Single Family Default Monitoring System and the Partial Claim Loss Mitigation Option

The Office of Inspector General (OIG) provided a memorandum to HUD with key considerations from prior audits of the HUD Single Family Default Monitoring System (SFDMS) and the partial claim loss mitigation option. In past audits, OIG identified HUD’s lack of effective controls for ensuring that lenders reported timely and accurate information on defaults and promptly filed for partial claims and that partial claims fully reinstated delinquent loans. Additionally, OIG identified that the current design of partial claims results in an inferior lien position on the securing property during a foreclosure sale. OIG recommended that HUD address this situation now to ensure program integrity and minimize the risk of financial loss during the COVID-19 pandemic.

Agencywide, Audit Memorandum: 2021-KC- 0801



HOUSING

OFFICE OF AUDIT

Necessary System Interfaces Between HERMIT and the National Servicing Center Were Not in Place

OIG audited selected general and application controls of the FHA Home Equity Reverse Mortgage Information Technology (HERMIT) system as part of the internal control assessments required for the fiscal year 2019 financial statement audit under the Chief Financial Officer’s Act of 1990. OIG’s objective was to review the selected controls over HERMIT for compliance with HUD information technology policies and Federal information system security and financial management requirements. This report is not available for public disclosure.

Agencywide, Audit Report: 2021-DP-0002



HOUSING

OFFICE OF AUDIT

FHA Insured \$940 Million in Loans for Properties in Flood Zones Without the Required Flood Insurance

OIG audited FHA-insured loans that originated in calendar year 2019. OIG’s objective was to determine whether FHA insured loans that were not eligible for insurance because they did not have the required flood insurance coverage. OIG found that FHA insured at least 3,870 loans that closed in 2019, totaling \$940 million, which were not eligible for insurance because they were made for properties in flood zones without the required flood insurance coverage. OIG recommended that FHA require lenders to provide evidence of sufficient flood insurance or execute indemnification agreements for the 43 loans in the statistical sample that did not have sufficient flood insurance at the time of the audit. OIG also recommended that FHA add to HUD databases the information necessary to ensure that the required flood insurance is in place at loan origination.

Agencywide, Audit Report: 2021-KC-0002



HOUSING

OFFICE OF AUDIT

HUD's Office of Multifamily Housing Programs Did Not Always Follow Mitigation Requirements for Its FHA-Insured Multifamily Projects

OIG audited HUD's Office of Multifamily Housing Programs. The objective was to determine whether (1) a complainant's allegations were substantiated for the 8 properties reviewed and (2) HUD properly followed mitigation requirements for the 17 properties reviewed. OIG found that HUD did not always properly follow mitigation requirements for its Federal Housing Administration-insured multifamily projects and did not conduct the required radon mitigation for one of its projects before final endorsement because multifamily HUD Environmental Review Online System (HEROS) users lacked training, HUD did not have procedures in place, and radon requirements were not updated on the closing documents. OIG recommended that HUD (1) conduct and make available internal HEROS training for all multifamily HEROS users on how to document the environmental review mitigation measures, (2) establish and implement written procedures specifying which multifamily employees are required to upload mitigation resolutions after construction completion and at final endorsement, (3) upload the 17 missing mitigation resolutions and the 1 missing radon testing document into HEROS for the projects in this finding, (4) strengthen HEROS or internal procedures to add a requirement confirming that the mitigation resolutions have been uploaded at final endorsement, and (5) strengthen HEROS by adding a column on the dashboard to show the progress of the overall mitigation status.

Agencywide, Audit Report: 2021-KC-0001



HOUSING

OFFICE OF AUDIT

Interim Audit Memorandum – The HUD Single Family Insurance Operations Division Should Take Additional Action To Inform Homeowners of Changes to Its FHA Refund Process Resulting From the COVID-19 Pandemic

OIG audited HUD’s Office of Multifamily Housing Programs. The objective was to OIG audited HUD’s response to COVID-19 to determine (1) whether it appropriately, effectively, and efficiently tracked, monitored, and issued FHA refunds owed to homeowners with terminated loans, and (2) how COVID-19 has affected policies, procedures, and distribution of FHA refunds and whether HUD’s response was appropriate. OIG determined that COVID-19 generally did not affect the Single Family Insurance Operations Division’s (SFIOD) FHA refund policies and procedures; however, SFIOD did not fully notify homeowners of operational changes to its physical mail procedures, which potentially impacted its distribution of refunds. The audit prompted HUD to take immediate corrective action for all three recommendations, one of which will be closed concurrently with the issuance of this memorandum and two of which will be completed during audit resolution.mitigation status.

Agencywide, Audit Memorandum: 2021-LA-0802





HOUSING

OFFICE OF INVESTIGATION



HUD-Approved Direct Endorsement Lender Agrees To Pay \$24.9 Million

Guild Mortgage Company, a HUD-approved direct endorsement lender, entered into a settlement agreement with the United States and agreed to pay \$24.9 million, of which \$16.9 million will be paid to FHA to resolve allegations that the lender violated the False Claims Act. Guild Mortgage Company failed to comply with program rules that require lenders to maintain quality control programs and failed to follow the self-reporting requirements. Although Guild Mortgage Company’s participation in this settlement did not constitute an admission of liability, the defined unallowable costs make it clear that the company certified and approved loans that were not eligible for FHA mortgage insurance and that without the lender’s actions, HUD would not have insured or guaranteed the loans. The lender also indicated in the agreement that it would identify similar situations not covered by this agreement and reimburse the United States for additional unallowable costs.

Washington, DC





HOUSING

OFFICE OF INVESTIGATION



Investors Agree To Pay HUD \$200,000 in Real Estate-Owned Flipping Scheme

Laziza Abdullaeva and Aziz Ashurov, real estate investors, entered into a settlement agreement with the United States and agreed to pay \$200,000 to HUD to resolve allegations that they violated HUD’s real estate-owned (REO) program rules. During the purchase of four REO properties, Abdullaeva and Ashurov falsely represented to HUD that they intended to occupy the properties as a primary residence for a period of 12 months. Abdullaeva and Ashurov failed to comply with the residency requirement and, instead, purchased, renovated, and resold the properties through their real estate investment company, Capital Invest, LLC. HUD OIG conducted this investigation.

Nashville, TN





HOUSING

OFFICE OF INVESTIGATION



Trio Sentenced in Mortgage Loan Modification Scheme

Sara Cordry and Ruby Price, co-owners of The Arize Group, Incorporated (AGI), and Tylor Korn, co-owner of Reliant Home Financial Group (RHFG), were collectively sentenced in U.S. District Court to 63 months incarceration, 6 years supervised release, and 1 year probation. Cordry was convicted of conspiracy, mail fraud, and wire fraud. She also pleaded guilty to defrauding HUD and was ordered to pay more than \$1 million in restitution to FHA. Korn and Price were ordered to pay jointly and severally more than \$1.3 million in restitution to individual victims in connection with their guilty pleas to conspiracy to commit mail and wire fraud. During a 1-year span, the conspirators, through AGI and RHFG, orchestrated a mortgage loan modification scheme, whereby they promised struggling homeowners that they would provide them with mortgage modification services in exchange for an advance fee. However, no modification services were provided, and the homeowners often found themselves worse off financially than they were before dealing with the conspirators. HUD OIG and the Federal Housing Finance Agency OIG conducted this investigation.

Kansas City, KS



PUBLIC AND INDIAN HOUSING

The U.S. Department of Housing and Urban Development (HUD) provides grants and subsidies to more than 3,100 public housing agencies (PHA) nationwide. Many PHAs administer both public housing and Section 8 programs. HUD also provides assistance directly to PHAs’ resident organizations to encourage increased resident management entities and resident skills programs.

Programs administered by PHAs are designed to enable low-income families, the elderly, and persons with disabilities to obtain and reside in housing that is safe, decent, sanitary, and in good repair. Some of the highlights from this semiannual period are noted in this chapter.



PUBLIC AND INDIAN HOUSING

OFFICE OF AUDIT

HUD’s PIH Office of Field Operations Generally Confirmed That PHAs Complied With the Implementing Guidance of HUD’s Smoke-Free Policy Requirements

HUD’s Office of Inspector General (OIG) audited HUD’s Office of Public and Indian Housing (PIH), Office of Field Operations’ (OFO) oversight of PHA compliance in implementing HUD’s smoke-free policy. OIG’s objective was to determine whether OFO ensured that PHAs complied with implementation guidance for HUD’s smoke-free policy requirements in public housing programs. OFO generally confirmed that it provided technical assistance to PHAs before the implementation deadline to help ensure their compliance and obtained self-reporting from a majority of more than 3,000 PHAs that they had obtained their board’s approval for implementing the policy and had amended their tenants’ leases as required. This report contains no recommendations.

Agencywide, Audit Report: 2021-AT-0001



PUBLIC AND INDIAN HOUSING

OFFICE OF AUDIT

Use of Landlord Incentives in the Housing Choice Voucher Program

OIG conducted a limited review to determine the use of landlord incentives to increase landlord participation and retention and expand housing options for program participants outside areas of low-income or minority concentration. The majority (28 of 34) of responsive Moving to Work (MTW) PHAs used the program and funding flexibilities of the MTW program to offer landlord incentives. These PHAs generally stated that the incentives they offered were somewhat effective, but it should be acknowledged that the effectiveness of an incentive varied widely. HUD should consider conducting further studies of incentives to better understand their effectiveness, which can help HUD better serve and connect with its landlords.

Agencywide, Audit Memorandum: 2021-LA-0803



PUBLIC AND INDIAN HOUSING

OFFICE OF AUDIT

Review of the Nampa Housing Authority's Public Housing Program

OIG audited the Nampa Housing Authority's public housing program. The objective was to determine whether the Authority followed HUD public housing requirements pertaining to (1) calculating contract rents, (2) maintaining its waiting lists, (3) providing its staff the credentials needed to access HUD systems, and (4) storing and securing tenant files. OIG found that the Authority charged 11 tenants the incorrect rent for at least 1 month, improperly maintained its waiting lists for housing tenants out of order, could not show that all HUD system users had proper credentials and that only employees with credentials accessed the system, and generally stored and secured tenant files properly. OIG recommended that HUD require the Authority to (1) reimburse the six tenants who overpaid rent totaling \$1,550 using non-Federal funds; (2) develop and implement internal control procedures that support its policy and ensure a proper tenant selection process when selecting tenants for housing; and (3) ensure that it follows all applicable HUD requirements related to accessing, using, and safeguarding credentials of HUD systems.

Nampa, ID, Audit Memorandum: 2021-SE-1801





PUBLIC AND INDIAN HOUSING

OFFICE OF INVESTIGATION

Landlord Agrees to Pay \$180,000 After Collecting Illegal Rents From HUD-Assisted Tenants

Hans Kuhn, Housing Choice Voucher Program (HCVP) landlord and owner of QN Corporation, entered into a settlement agreement with the United States and agreed to pay \$180,000, of which \$140,000 will be paid to HUD, to resolve allegations that he and QN Corporation knowingly violated the False Claims Act when they charged and collected rents from multiple tenants who received rental assistance through HUD’s HCVP. The additional rents collected violated contractual and regulatory certifications and conditions for rental subsidy payments by including rents for units subsidized under HUD’s HCVP that exceeded rents permitted by contract and the PHA. HUD OIG conducted this investigation.

Chicago, IL





PUBLIC AND INDIAN HOUSING

OFFICE OF INVESTIGATION

Former Public Housing Agency Executive Director Sentenced to 5 Years Probation

Tana Gutierrez, former executive director of a PHA, was sentenced in U.S. District Court in connection to her earlier guilty plea to theft from programs receiving Federal funds. Gutierrez was sentenced to 5 years probation and ordered to pay a \$23,258 special assessment to HUD. For more than 3 years, Gutierrez awarded herself duplicate payroll checks, unauthorized overtime payments, and unauthorized payments from the PHA’s Public Housing Capital Fund program, resulting in an overpayment of payroll and bonuses, which were not approved by the PHA’s board of directors. HUD OIG and the Federal Bureau of Investigation conducted this investigation.

Del Rio, TX





PUBLIC AND INDIAN HOUSING

OFFICE OF INVESTIGATION

Convicted Sex Offender Found Living in HUD-Subsidized Housing Sentenced to 10 Years Incarceration

Kristopher Boutin, a previously convicted sex offender subject to lifetime sex offender registration, was sentenced in U.S. District Court to 10 years incarceration for failing to register as a sex offender with the State of California upon his arrival in the State in 2013 in violation of the Sex Offender Registration and Notification Act. While in California, Boutin resided in a HUD-subsidized Continuum of Care rental unit as an unauthorized tenant in violation of HUD’s program regulations. HUD OIG, the U.S. Marshals Service-Sex Offender Investigations Branch, and Homeland Security Investigations conducted this investigation.

Los Angeles, CA



AUDIT



4

KEY PROGRAM
RESULTS



\$7,101,383

RECOMMENDED
QUESTIONED
COSTS



\$854,223

RECOMMENDED
FUNDS PUT TO
BETTER USE

INVESTIGATION



\$4,020,006

INVESTIGATIVE
RECOVERIES



19

CONVICTIONS-PLEAS-
PRETRIAL
DIVERSIONS



8

ADMINISTRATIVE -
CIVIL ACTIONS

COMMUNITY PLANNING AND DEVELOPMENT

The Office of Community Planning and Development (CPD) seeks to develop viable communities by promoting integrated approaches that provide decent housing, suitable living environments, and expanded economic opportunities for low- and moderate-income persons. The primary means toward this end is the development of partnerships among all levels of government and the private sector. Some of the highlights from this semiannual period are outlined in this chapter. Additionally, in response to disasters, Congress may appropriate additional funding to Community Development Block Grant Disaster Recovery (CDBG-DR) to rebuild the affected areas and provide crucial seed money to start the recovery process. Since fiscal year 2001, the U.S. Department of Housing and Urban Development (HUD) has allocated \$89.8 billion in CDBG-DR and CDBG Mitigation (CDBG-MIT) grants to help cities, counties, and States recover from presidentially declared disasters. Of the \$89.8 billion in disaster allocations that have been allocated nationwide, nearly \$69.3 billion has been obligated and more than \$45.3 billion has been disbursed as of the end of the period.



COMMUNITY PLANNING AND DEVELOPMENT

OFFICE OF AUDIT

HUD and its CDBG-DR grantees have experienced challenges related to the COVID-19 Pandemic

HUD’s Office of Inspector General (OIG) completed a survey of the impact of the COVID-19 pandemic on HUD’s CDBG-DR grantees to determine the challenges that HUD and its grantees are experiencing related to the COVID-19 pandemic and to help inform HUD and Congress on the issues faced in responding to the pandemic. Many HUD CDBG-DR grantees reported facing challenges with systems-technology and communications and reported substantial challenges with project construction delays and incurring additional costs. Other challenges reported by the grantees included monitoring, construction resources and lack of capacity, travel restrictions and telework, and work-home balance. OIG determined that there were eight recurring themes faced by CDBG-DR grantees and HUD officials during the COVID-19 pandemic. OIG issued a memorandum, which contained no recommendations.

Agencywide, Audit Memorandum: 2021-GA-0801



COMMUNITY PLANNING AND DEVELOPMENT

OFFICE OF AUDIT

Neighborhood Housing Services of Los Angeles County, Los Angeles, CA, Did Not Always Follow Program Requirements in Administering Its NSP2

OIG audited the Neighborhood Housing Services of Los Angeles County’s (NHSLA) Neighborhood Stabilization Program 2 (NSP2). The objective was to determine whether NHSLA administered its NSP2 in accordance with program requirements, focusing on procurement and contracting expenditures of program income. NHSLA did not always follow program requirements in administering its NSP2. OIG found that HUD did not have assurance that more than \$5.1 million in program income was used for its NSP2, \$1.7 million in salary expenditures was in accordance with program requirements, and \$85,692 in construction costs was reasonable. OIG provided HUD with six recommendations requiring NHSLA to support these costs or repay them.

Los Angeles, CA, Audit Report: 2021-LA-1002



COMMUNITY PLANNING AND DEVELOPMENT

OFFICE OF AUDIT

Drawdown Levels for the Initial Round of CARES Act Emergency Solutions Grants Were Minimal

OIG conducted a limited review to identify the HUD Coronavirus Aid, Relief, and Economic Security Act (CARES Act) drawdown levels for the initial round of Emergency Solutions Grants (ESG) funding. The objective was to highlight the grantees’ (1) drawdown levels for the initial round of ESG CARES Act funding and (2) published information on how the funds have been and will be used. The review determined that as of July 1, 2020, the ESG CARES Act drawdown levels for the initial round of funding of \$1 billion had been minimal. Most grantees in the sample had not elected to waive their citizen participation plans or indicated whether they would use their consultation waiver, and many had not published their planned uses of the funds. OIG did not make any recommendations to HUD.

Agencywide, Audit Memorandum: 2021-LA-0801



COMMUNITY PLANNING AND DEVELOPMENT

OFFICE OF AUDIT

The City of Compton, Compton, CA, Did Not Always Administer Neighborhood Stabilization Program Funds in Compliance With Procedures and Regulations

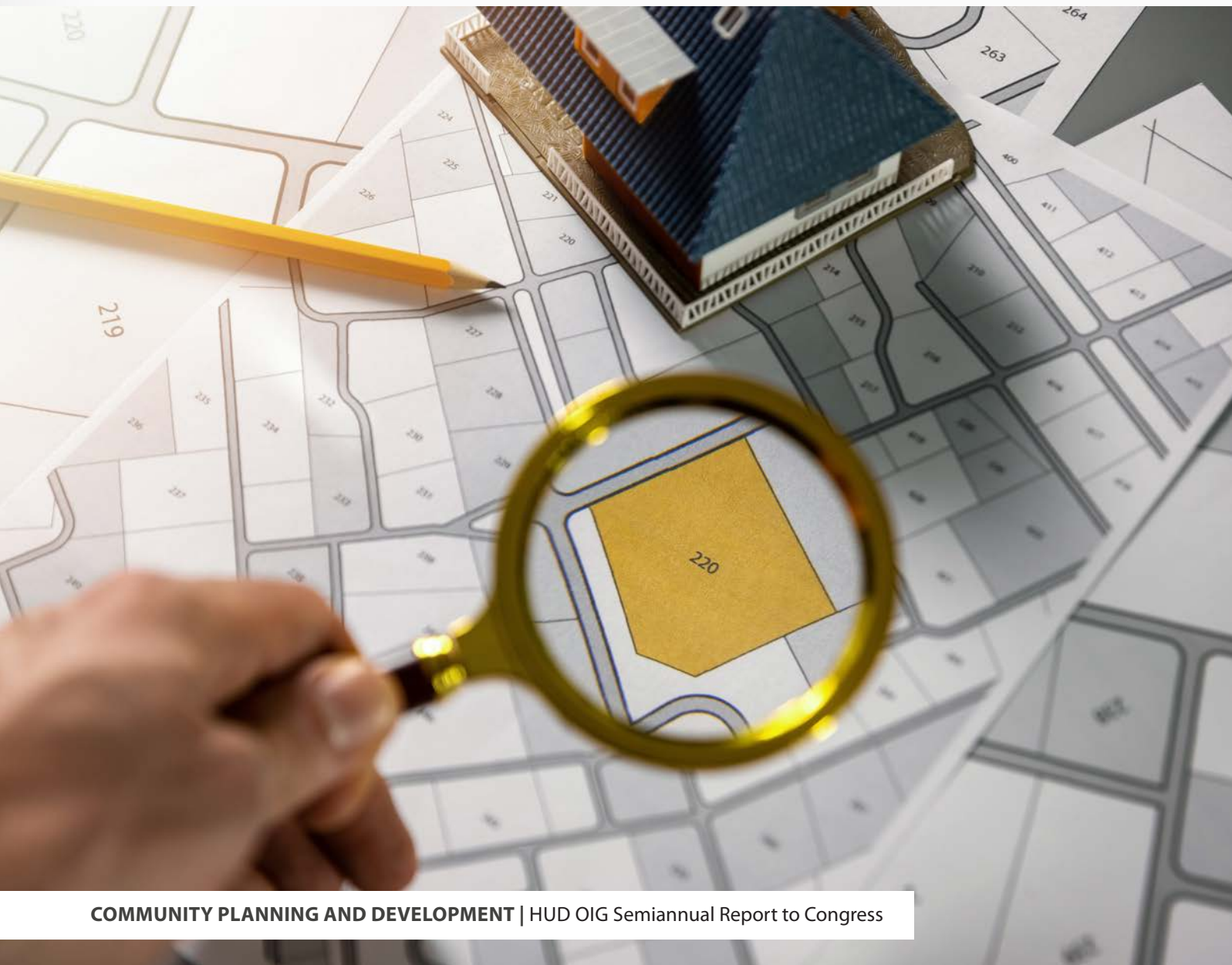
OIG audited the City of Compton’s Neighborhood Stabilization Programs (NSP) 1 and 3. The objective was to determine whether the City administered NSP1 and NSP3 funds in compliance with its own procedures and HUD regulations. The City did not implement its procurement controls and experienced high staff turnover, which did not allow it to administer these programs in compliance with HUD regulations. As a result, the City did not give vendors the opportunity to bid in fair and open competition for the services needed in the targeted areas. Also, the City disbursed a total of \$272,206 in questioned program expenses, and the City’s late submission of required reports to HUD and lack of posting performance reports on its website prevented stakeholders from knowing the progress of its program-funded projects and activities. OIG recommended that HUD require the City to (1) implement procurement controls to maintain complete procurement documents, (2) provide adequate documents to support \$270,656 in program expenses, and (3) submit future required reports to HUD on time and post the missing and future HUD quarterly performance reports on its website.

Compton, CA, Audit Report: 2021-LA-1001



COMMUNITY PLANNING AND DEVELOPMENT

OFFICE OF INVESTIGATION



United Cerebral Palsy of Northern, Central, and Southern New Jersey Ordered To Dissolve and Pay \$385,000 in Restitution and Fines

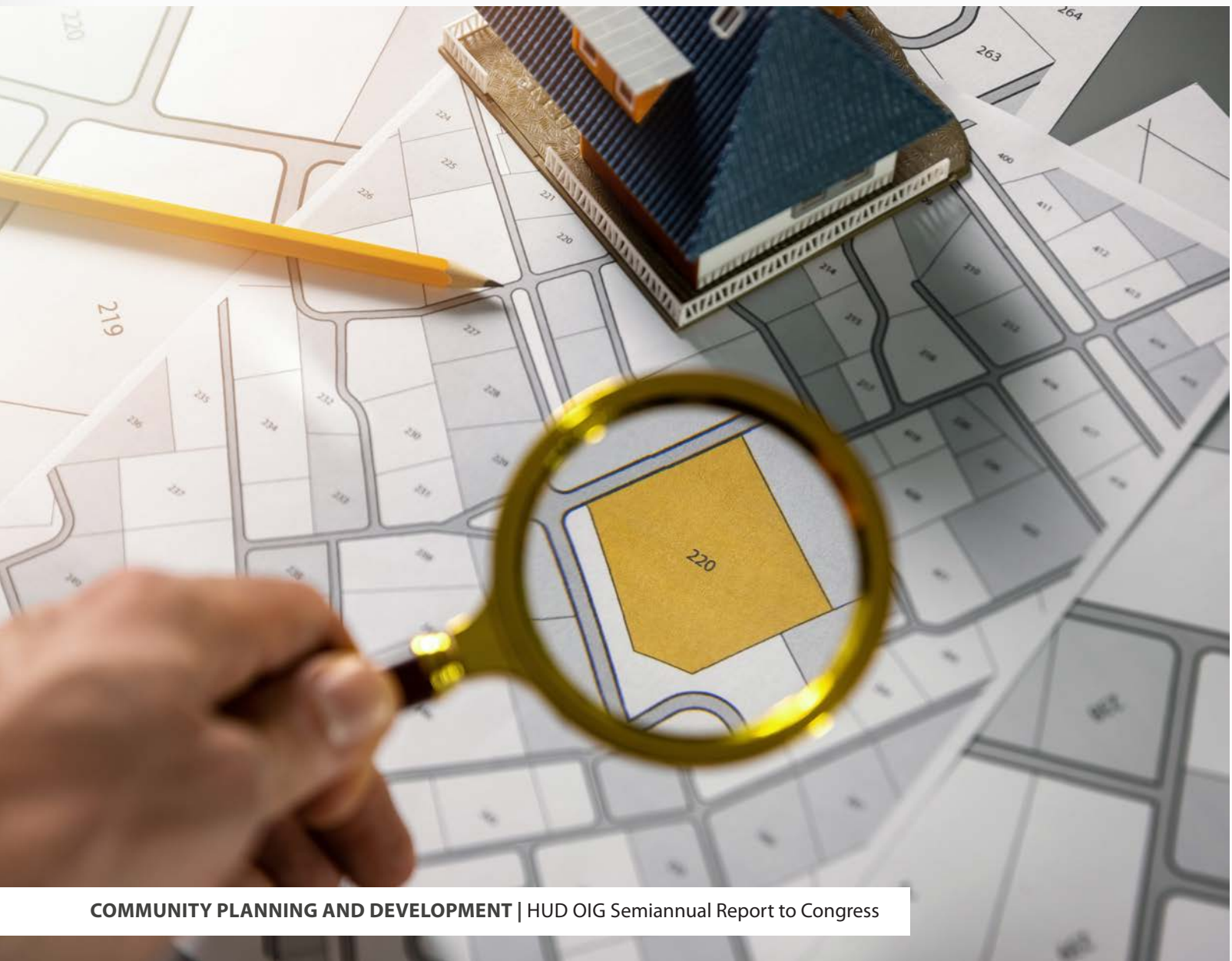
The United Cerebral Palsy of Northern, Central, and Southern New Jersey Inc. (UCPNCSNJ), a nonprofit corporation, was sentenced in the Superior Court of New Jersey in connection to its earlier guilty plea to theft by failure to make required disposition of property received. UCPNCSNJ was sentenced to dissolve the company and ordered to pay \$225,000 in restitution to United Cerebral Palsy’s national organization and \$160,000 in civil fines to the State of New Jersey for failure to register as a charitable organization. For nearly 1 year, UCPNCSNJ failed to register as a charitable organization within the State of New Jersey and purposely obtained and retained funds that were to be used for helping individuals with cerebral palsy or similar charitable activities. UCPNCSNJ also applied as a nonprofit organization and received 2 HUD-funded CDBG-DR loans totaling \$920,000, which were administered by the State of New Jersey and were for the construction of 9 single-family homes and the conversion of a hotel into an 84-unit condominium for low- to moderate-income families and housing to service disabled individuals. The allegations of fraud and misuse of the CDBG-DR loan funds were unsubstantiated. HUD OIG and the New Jersey Division of Criminal Justice conducted this investigation.

Chester, NJ



COMMUNITY PLANNING AND DEVELOPMENT

OFFICE OF INVESTIGATION



13 Conspirators Sentenced in Scheme To Defraud Homeless-Serving Nonprofit

Clarissa Combs, Bridgit Michaud, Aishia Bell, former employees of a nonprofit organization that provides housing and related services to the homeless, and Jalonda Combs, Aisha Davis, Anthony Oliver, Leteaste Henry-Davis, Rachael Ekholm, Sharre Rush, Shaneka Mzee, Audrey Heath, Neal Burton, and Tyrone Burton, purported landlords and vendors of the nonprofit, were collectively sentenced in U.S. District Court to 10 years incarceration, 32 years supervised release, and 1,125 hours community service and ordered to pay \$684,081 in restitution jointly and severally to the nonprofit. For nearly 7 years, the conspirators devised and participated in a scheme to defraud \$684,081 in funds intended to help the homeless by recruiting other employees of the nonprofit, as well as friends, family members, and associates, to pose as landlords and vendors, causing the nonprofit to make direct payments to the fictitious landlords and vendors, who then provided Combs with monetary kickbacks. The nonprofit receives its funding from private donors, charitable foundations, and HUD’s ESG program, among others, to provide services to the homeless. An undetermined amount of the embezzled funds was attributable to the ESG program. HUD OIG, the U.S. Postal Inspection Service, and the Federal Bureau of Investigation conducted this investigation.

Minneapolis, MN

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Reimbursements Received Through Rent Credits From the General Services Administration

OIG initiated an audit of the rent credits that HUD received from the General Services Administration (GSA) during fiscal years 2015 through 2018 due to concerns OIG identified while completing a review of HUD's use of funds approved by Congress for building improvements. OIG's objective was to determine whether HUD accounted for and managed rent credits issued by GSA in exchange for HUD's financial contributions for building improvements in accordance with applicable requirements. OIG found that HUD did not properly account for and manage reimbursements totaling nearly \$7.8 million, which it obtained through rent credits issued to it by GSA in 2017 in exchange for improvements that it made in its headquarters building in 2016, that HUD exceeded its fiscal year 2017 appropriated funding level and potentially violated the Antideficiency Act, and that HUD's Chief Financial Officer has the sole authority to investigate this potential violation and determine whether HUD was required to deposit the value of rent credits into the U.S. Department of the Treasury's general funds. OIG recommended that HUD's Chief Financial Officer investigate the facts surrounding the potential Antideficiency Act violation and develop corrective action plans and take disciplinary actions if it is determined that a violation has occurred.

Agencywide, Audit Report: 2021-PH-0002

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Fiscal Year 2019 Review of Information Systems Controls in Support of the Financial Statements Audit

OIG audited the information systems controls over HUD’s computing environment as part of the internal control assessments for the fiscal year 2019 financial statements audit under the Chief Financial Officer’s Act of 1990. The objective was to assess general controls over HUD’s computing environment for compliance with HUD information technology policies and Federal information system security and financial management requirements, with a focus on the general controls over HUD’s IBM mainframe general support system. OIG has determined that the contents of this audit report would not be appropriate for public disclosure and has, therefore, limited its distribution to those officials listed on the report distribution list.

Agencywide, Audit Report: 2021-DP-0001

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Audit of HUD's Fiscal Year 2020 Consolidated Financial Statements

In accordance with the Chief Financial Officers Act of 1990, as amended, OIG is required to annually audit the consolidated financial statements of HUD. OIG's objective was to express an opinion on the fair presentation of HUD's consolidated financial statements in accordance with U.S. generally accepted accounting principles applicable to the Federal Government. OIG identified deficiencies that constituted one material weakness and one instance of noncompliance with applicable laws, regulations, contracts, and grant agreements. This report contains several current recommendations for corrective actions addressed to the Offices of the Chief Financial Officer, Community Planning and Development, Housing – Federal Housing Administration (FHA), and Public and Indian Housing. Most significant are those recommendations related to properly accounting for certain funding provided to HUD under the Coronavirus Aid, Relief, and Economic Security Act and improving and better documenting HUD's estimation and validation methodologies for accrued grant liabilities.

Agencywide, Audit Report: 2021-FO-0003

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Audit of Ginnie Mae's Fiscal Year 2020 Financial Statements

OIG audited the Government National Mortgage Association's (Ginnie Mae) fiscal year 2020 financial statements, which included a report on Ginnie Mae's internal control and test of compliance with selected provisions of laws, regulations, and contracts applicable to Ginnie Mae. OIG reported that Ginnie Mae had a significant deficiency in the control design of its organizational structure for two key functions, estimation model development and model verification. OIG further reported that this control deficiency potentially prevents an effective challenge to models used to develop significant estimates for financial reporting.

Agencywide, Audit Report: 2021-FO-0002

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Audit of the Federal Housing Administration's Fiscal Years 2020 and 2019 Financial Statements

The Chief Financial Officers Act of 1990 (Public Law 101-576), as amended, requires OIG to audit the financial statements of FHA annually. OIG audited the accompanying FHA financial statements and notes as of and for the fiscal years ending September 30, 2020 and 2019, as well as FHA's internal control and test of compliance with selected provisions of laws, regulations, and contracts applicable to FHA. This audit did not disclose any deficiencies in internal control that were material weaknesses or significant deficiencies and no instances of noncompliance with applicable laws, regulations, and contracts. OIG has no new recommendations in this report; however, the "Followup on Prior Audits" section contains recommendations from prior-year audits that remain unresolved. FHA should continue to track and resolve these recommendations in accordance with departmental procedures.

Agencywide, Audit Report: 2021-FO-0001

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Opportunities Exist To Improve HUD's Communication to Renters About Eviction Protections

As part of the Coronavirus Aid, Relief, and Economic Security Act, OIG reviewed HUD's communication to renters regarding the eviction moratorium found in Section 4024. The objective was to highlight the progress HUD has made and identify areas for improvement. OIG found that HUD provided critical information to many of these renters through its website and published guidance. However, OIG identified several aspects of HUD's communication to renters on its website and published guidance that could be strengthened and areas of the joint website that could be improved. While the Section 4024 eviction moratorium expired on July 24, 2020, it is still crucial that HUD have clear, complete, and accessible guidance available to help renters at a time when their health and financial stability may be at risk. If HUD maintains up-to-date and easily accessible information for all impacted renters, it will help to ensure that renters know their rights, maintain housing stability through the pandemic, and avoid homelessness.

Agencywide, Audit Memorandum: 2021-NY-0801

OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF AUDIT

The U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) more significant reports are highlighted in this chapter.

Wage Determinations for FHA-Insured Multifamily Construction Projects

OIG audited HUD’s implementation of the prevailing wage provisions of the Davis-Bacon Act for its FHA-insured multifamily construction projects. The objectives were to determine whether (1) the allegation in a complaint had merit and (2) HUD implemented the correct Davis-Bacon wage determinations for its multifamily construction projects. Based on the audit results, OIG recommended that HUD (1) seek guidance from the U.S. Department of Labor (DOL) to correct the wage determinations for the five projects addressed in this report; (2) determine the correct wages to be paid to workers and ensure that appropriate actions are taken to pay the workers; (3) update HUD’s guidance to comply with DOL’s policies and guidance on the application of multiple wage determinations for construction projects; and (4) develop and implement controls to ensure that the appropriate Davis-Bacon wage rate determinations are implemented in the contracts of FHA-insured multifamily construction projects that require multiple wage determinations, including the requirement that contract specifications clearly identify the portions of the contract subject to each assigned wage determination.

Agencywide, Audit Report: 2021-PH-0001



OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF EVALUATION

Contaminated Sites Pose Potential Health Risks to Residents at HUD-Funded Properties

The West Calumet Housing Complex (WCHC), located in East Chicago, IN, is a housing development that opened on top of a former lead smelting plant in 1972. HUD and other agencies missed multiple opportunities to identify site contamination at WHCH, resulting in residents’ continuing to live in unsafe conditions for decades, and inadequate oversight led to the lead poisoning of children. HUD partnered with and relied on the Environmental Protection Agency (EPA) to identify and develop a mitigation strategy for contaminated HUD-funded properties. Since 2016, HUD and EPA have been working to update a list of HUD-funded properties on or near contaminated sites, and while HUD has taken steps to improve communication with EPA, it can do more with the information it receives to understand how contaminated sites might impact HUD-funded properties. OIG recommended that HUD develop and implement strategies to research properties, determine whether site contamination should be considered in future reviews, and monitor those reviews.

Agencywide, Evaluation Report: 2019-OE-0003





OTHER SIGNIFICANT AUDITS AND EVALUATIONS

OFFICE OF EVALUATION

HUD Fiscal Year 2020 Federal Information Security Modernization Act of 2014 (FISMA) Evaluation Report

The Federal Information Security Modernization Act of 2014 directs Inspectors General to conduct an annual evaluation of the agency information security program. OIG conducted this evaluation to assess the overall effectiveness of HUD’s information security program, assess its compliance with Federal guidance, and respond to Office of Management and Budget reporting questions for the fiscal year 2020 annual assessment. OIG has determined that the contents of this report would not be appropriate for public disclosure and has, therefore, limited its distribution to selected officials.

Agencywide, Evaluation Report: 2020-OE-0001



OFFICE OF INSPECTOR GENERAL

U.S. Department of Housing and Urban Development

For the period October 1, 2020
to March 31, 2021

Read the full report at www.hudoig.gov

