Recommendation Num Report Date		Recommendation Text	Balance Due
		Require that the PHA reimburse \$2,568,000, less any restitution, for the fictitious training	
2000-AT-1003-003-C	3/6/2000	invoices.	\$1,114,897
		Obtain additional supporting documentation or recover from city \$795,178 paid for police	
2001-AT-1001-001-A	10/20/2000	protection, recreation and code enforcement activities.	\$573,658

2 \$1,688,555

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Take action to refinance mixed financing developments, recover inappropriately	
		expended Annual Contributions Contract funds, sanctions for Annual Contributions	
2001-PH-1803-001-A	8/31/2001	Contract violations.	\$160,000

\$160,000

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support unsupported expenditures of \$60,750 that were drawn down for the grant.	
2002-PH-1005-001-C	9/30/2002	For any unsupported expenditures require grantee reimburse HUD.	\$60,750
2002-PH-1005-001-D	9/30/2002	Reimburse HUD for the \$23,422 ineligible expenditures charged to the grant.	\$22,854
		If implementation continues we recommend that HUD complete and implement the	
2002-NY-0001-001-B	2/25/2002	regulations.	\$0
	3		\$83,604

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Establishes a formal repayment agreement with the Housing Authority that will allow the	
		current debt owed to HUD of \$533,432 to be repaid without disrupting the Section 8	
		Program. The following should be included in the agreement: prior HUD approval of the	
		Housing Authority's proposed budgets; and a requirement that the Housing Authority	
		revise its funding requisitions when leasing levels materially change so that future	
2003-CH-1019-001-B	7/25/2003	overpayments will be avoided.	\$504,290
		Recover from owner \$2,687,822, the difference between \$3,662,822 owed to HUD by	
2004-BO-1002-001-A	11/4/2003	owner and \$975,000 proceeds of foreclosure sale.	\$333,581
		Provides documentation to support that it appropriately made \$324,364 in Housing	
		Assistance Payments. If adequate documentation cannot be provided, then the	
		Authority should reimburse its Section 8 Housing Program from non-Federal funds for	
2004-CH-1001-003-B	11/26/2003	the appropriate amount.	\$300,327
		Ensures that the \$287,224 of housing work cited in this finding is completed correctly	
		using non-federal funds. If the Authority is unable to ensure the work is completed	
		correctly, then the Authority should reimburse its Comprehensive Assistance	
		Improvement Program (now the Capital Fund Program) from non-Federal funds the	
2003-CH-1011-001-A	3/24/2003	applicable amount of work not completed correctly or not provided.	\$286,408
		Reimburses its Section 8 Housing Program \$150,851 from non-Federal funds for the	
		Section 8 administrative fees collected by the Authority (\$14,942) and the Housing	
		Assistance Payments (\$135,909) improperly made for the Section 8 housing units that did	
2004-CH-1001-002-B	11/26/2003	not meet HUD's Housing Quality Standards.	\$95,965
		Provides documentation to support the \$72,329 of unsupported salaries and wages cited	
		in this finding. If documentation cannot be provided, the Authority should reimburse its	
2003-CH-1014-002-A	3/28/2003	Public Housing Program the appropriate amount from non-Federal funds.	\$71,513
		Provides documentation to support the \$43,132 of unsupported payments cited in the	
		Indiana State Board of Accounts audit report. If documentation cannot be provided, then	
		the Authority should reimburse its Section 8 Voucher Program for the amount that	
2003-CH-1019-002-D	7/25/2003	cannot be supported from non-Federal funds.	\$43,132
		Reimburses its Section 8 Voucher Program \$42,206 from non-Federal funds for the	
2003-CH-1019-002-A	7/25/2003	ineligible costs cited in this finding.	\$41,146

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Reimburses its Section 8 Voucher Program \$40,708 from non-Federal funds for ineligible	
2003-CH-1019-002-C	7/25/2003	costs cited in the Indiana State Board of Accounts audit report.	\$40,708
		Reimburses its Voucher Program from non-Federal funds \$60,399 for Section 8 subsidy at	
2003-CH-1019-003-A	7/25/2003	units it incorrectly certified met Housing Quality Standards.	\$28,248
		Provides documentation to support the \$1,672 of unsupported payments cited in this	
		finding. If documentation cannot be provided, then the Authority should reimburse its	
		Section 8 Voucher Program from non-Federal funds for the amount that cannot be	
2003-CH-1019-002-B	7/25/2003	supported.	\$1,672
		Provides documentation to support the annual income used in 26 reexaminations for	
		\$112,753 in Housing Assistance Payments. If adequate documentation cannot be	
		provided, then the Authority should reimburse its Section 8 Housing Program from non-	
2004-CH-1001-003-D	11/26/2003	Federal funds for the appropriate amount.	\$0

12 \$1,746,990

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Require the PRPHA to submit all supporting documentation and determine the	
		accuracy of the \$4,230,646 owed by PBA and its public housing management agents.	
		Any amounts determined ineligible must be reimbursed to the ACC projects, from non-	
2004-AT-1006-001-B	4/22/2004	Federal funds.	\$4,230,256
		Require the Authority to repay its programs \$6,855,271 spent for ineligible	
		procurements. Repayment should be from non-Federal funds and paid in the	
		following amounts and to the following programs: Conventional Public Housing	
		General Fund \$2,818,331, Capital Fund \$3,630,215, HOPE VI \$259,289, Section 8	
		\$115,128, Drug Elimination \$12,048, Economic Development Support Services	
2005-AT-1004-002-E	11/19/2004	\$13,831, and Turnkey III Program \$6,429.	\$3,497,547
		Direct the Authority to provide adequate documentation to support \$1,943,993 or	
2004-PH-1011-002-B	9/8/2004	reimburse HUD from nonfederal sources.	\$175,935
		We recommend that HUD's Director of Public Housing Hub, Detroit Field Office, assure	
		the Royal Oak Township Housing Commission: Reimburse its Public Housing Program	
		\$367,516 from non-Federal funds for the improper use of HUD operating subsidy funds	
2005-CH-1003-001-A	11/29/2004	cited in this finding.	\$91,879
		We recommend that HUD's Director of Public Housing Hub, Detroit Field Office, assure	
		the Royal Oak Township Housing Commission: Reimburse its Public Housing Program	
		\$45,220 from non-Federal funds for the operating subsidy that was not used in	
2005-CH-1003-002-A	11/29/2004	accordance with HUD's One Strike Policy.	\$45,220
		We recommend that HUD's Director of Public Housing Hub, Detroit Field Office, assure	
		the Royal Oak Township Housing Commission: Reimburse its Public Housing Program	
2005-CH-1003-002-C	11/29/2004	\$3,340 from non-Federal funds for thee ineligible travel costs.	\$3,340
2004-PH-1011-001-B	9/8/2004	Require the Authority to reimburse HUD \$882,916 from nonfederal sources.	\$0

7 \$8,044,177

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Descrive the Municipality to obtain and submit all supporting desurportation and IIID	
		Require the Municipality to obtain and submit all supporting documentation and HUD	
		determine the eligibility and propriety of \$1,011,801 in administrative costs the	
		Corporation charged to the Block Grant revolving fund. Any amounts determined	
2005-AT-1013-002-A	9/15/2005	ineligible must be reimbursed to the Block Grant program from nonfederal funds.	\$1,011,801
		We recommend that the director of HUD's Public Housing Hub, Cleveland Field Office,	
		require the Authority to provide support or reimburse its Section 8 program \$812,967	
		(\$738,708 in housing assistance payments plus \$74,259 in related administrative fees)	
		from nonfederal funds for unsupported housing assistance payments and unearned	
2005-CH-1020-004-A	9/29/2005	administrative fees related to the 65 tenants cited in this finding.	\$767,977
		We recommend that the director of HUD's Public Housing Hub, Cleveland Field Office,	
		require the Authority to reimburse its Section 8 administrative fees \$805,585 from	
2005-CH-1020-003-A	9/29/2005	nonfederal funds for inappropriately funding HOPE VI expenses.	\$733,979
		Require the Municipality to obtain and submit all supporting documentation and HUD	
		determine the eligibility and compliance with national objectives of the \$631,195 the	
		Corporation disbursed for the four loans. Any amounts determined ineligible must be	
2005-AT-1013-003-A	9/15/2005	reimbursed to the Block Grant program from nonfederal funds.	\$471,578
		We recommend that HID's Director of Public Housing Hub, Chicago Pagional Office	
		We recommend that HUD's Director of Public Housing Hub, Chicago Regional Office,	
	4/0/200	assure that the Authority reduces its Low-Rent Performance Funding Operating Subsidy	
2005-CH-1010-001-A	4/8/2005	by \$119,376 for the excessive operating subsidy cited in this finding.	\$14,026

5 \$2,999,361

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		For the overpayments of phase-down funding identified in appendix C, recover \$20.6	
		million in ineligible phase-down funding requests from the public housing agencies for	
2006-BO-0001-001-C	7/11/2006	fiscal years 2004 and 2005.	\$6,855,367
		We recommend that the director of HUD's Detroit Office of Public Housing require the	
		Commission to Reimburse its program \$535,903 from nonfederal funds (\$507,860 for	
		the property purchase plus \$28,043 for legal costs) for the improper use of program	
2006-CH-1018-001-A	9/28/2006	funds to pay for the property's acquisition costs.	\$535,903
		We recommend that the director, New Jersey Office of Public Housing, instruct the	
		Authority to recapture or reduce the Section 8 administrative fee reserve account by	
		\$590,042 to comply with the requirements of PIH [Public and Indian Housing] Notice	
2006-NY-1012-001-B	9/22/2006	2005-30.	\$295,021
		We recommend that the director of HUD's Chicago Office of Public Housing require the	
		Authority to provide supporting documentation or reimburse its program \$582,926	
		(\$547,238 in housing assistance and utility allowance payments and \$35,688 in	
		associated administrative fees) from nonfederal funds for the unsupported payments	
		and associated administrative fees related to the 73 household files cited in this	
		finding.	
2006-CH-1020-001-A	9/29/2006		\$293,425
		We recommend that the director of HUD's Chicago Office of Public Housing require the	
		Authority to review the remaining 717 (779 minus 62) zero-income households as of	
		September 23, 2005, to determine whether they had unreported income. For	
		households that received excessive housing assistance and utility allowance payments,	
		the Authority should pursue collection and/or reimburse its program the applicable	
2006-CH-1021-002-C	9/30/2006	amount from nonfederal funds.	\$254,879
		We recommend that the director, New Jersey Office of Public Housing, instruct the	
		Authority to reimburse the capital fund from the Section 8 program the \$401,046 in	
2006-NY-1012-001-D	9/22/2006	excess/ineligible capital fund transfers.	\$213,892
		Require the Commonwealth to provide documentation to substantiate the eligibility of	
		\$150,000 provided to Southampton or repay the HOME program from nonfederal	
2006-PH-1013-001-B	9/18/2006	funds.	\$125,000

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the director of HUD's Detroit Office of Public Housing require the	
		Commission to provide documentation to support the \$206,224 in unsupported	
		program disbursements cited in this finding or reimburse its program from nonfederal	
		funds for the applicable amount.	
2006-CH-1010-001-A	5/18/2006		\$115,149
		We recommend that the director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$80,776 (\$49,034 for the overpayment of housing	
		assistance and utility allowance payments for 34 households and \$31,742 in	
		administrative fees associated with the overpayment and underpayment of housing	
2006-CH-1020-001-B	9/29/2006	assistance and utility allowance payments for 48 households) from nonfederal funds.	\$67,944
		We recommend that the director of HUD's Cleveland Office of Public Housing require	
		the Authority to reimburse its public housing operating fund \$181,513 from nonfederal	
2007-CH-1001-001-A	12/13/2006	funds for the inappropriate disbursements cited in this finding.	\$57,405
		We recommend that the director, New Jersey Office of Public Housing, require the	
		Authority to provide additional documentation for the \$23,592 in unsupported costs	
		related to managerial services and legal and auditing costs so that HUD can determine	
		the eligibility of these items. Any amounts determined to be ineligible should be	
2006-NY-1010-002-B	9/20/2006	repaid.	\$23,592
		Obtain and review support (as identified in recommendation 1D) for \$15.1 million in	
		unsupported phase-down funding in fiscal years 2004 and 2005, determine the correct	
		amount of phase-down funding, and require the public housing agencies to reimburse	
2006-BO-0001-001-B	7/11/2006	HUD for any ineligible funding received.	\$0

12 \$8,837,577

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the director of HUD's Cleveland Office of Public Housing require	
		the Agency to reimburse its program administrative fee reserve \$1,636,075 from the	
2007-CH-1011-001-A	7/23/2007	appropriate funds for the excessive administrative expenses cited in this finding.	\$1,636,075
		We recommend that the director of HUD's Cleveland Office of Public Housing require	
		the Authority to provide documentation to support that the \$913,365 in refunding	
		savings cited in this finding was used to provide affordable, decent, safe, and sanitary	
		housing to very low-income households or reimburse from nonfederal funds its	
2007-CH-1005-001-A	2/22/2007	refunding savings account(s), as appropriate, to be able to trace its use of the savings.	\$913,365
2007-CH-1005-001-A	3/23/2007	refunding savings account(s), as appropriate, to be able to trace its use of the savings.	3913,303
		We recommend that the director of HUD's Office of Public Housing instruct the	
		Authority to reimburse the capital fund program \$818,536 related to the administrative	
2007-NY-1011-001-A	8/17/2007	and management improvement costs that exceeded HUD limitations.	\$818,536
		We recommend that the director of HUD's Office of Public Housing instruct the	
		Authority to reduce the Authority's future capital funds by \$632,039 related to the fiscal	
2007-NY-1011-001-C	8/17/2007	years 2003 and 2004 capital funds transferred to the low-rent public housing program.	\$442,428
		We recommend that the director of HUD's Office of Public Housing instruct the	
		Authority to reimburse HUD for the excessive administrative fee charge of \$692,990 in	
2007-NY-1006-001-A	5/24/2007	capital funds in accordance with the procedures described in 24 CFR 905.120.	\$415,796
		Repay its low-rent public housing program \$834,969 from nonfederal funds for the	
2007-PH-1013-001-B	9/27/2007	ineligible disbursements related to the credit union.	\$184,969
		We recommend that the director of HUD's Chicago Office of Public Housing require the	
		Authority to provide supporting documentation or reimburse its program \$140,521	
		(\$126,224 in housing assistance and utility allowance payments plus \$14,297 in related	
		administrative fees) from nonfederal funds for the unsupported payments and	4
2007-CH-1010-002-C	7/20/2007	associated administrative fees related to the 20 households cited in this finding.	\$140,521

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Cleveland Office of Public Housing require	
		the Authority to reimburse its Public Housing program \$337,870 from nonfederal funds	
		for the rental income received by its nonprofit from the Turnkey III properties.	
2008-CH-1001-001-D	11/19/2007		\$135,145
2007-KC-1004-002-A	1/12/2007	Repay from nonfederal sources, the \$147,934 improperly spent for employee leave.	\$88,486
		We recommend that the director of HUD's Detroit Office of Public Housing require the	
		Commission to provide supporting documentation or reimburse its program \$166,782	
		from nonfederal funds for the unsupported operating subsidies related to the 51	
		household files cited in this finding.	
2007-CH-1002-002-A	1/25/2007		\$80,637
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$54,024 from nonfederal funds (\$47,295 for housing	
		assistance payments and \$6,729 in associated administrative fees) for the 28 units that	
2007-CH-1014-001-B	9/24/2007	materially failed to meet HUD's housing quality standards.	\$50,874
		We recommend that the director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$39,428 in housing assistance from nonfederal funds	
		for the overpayment of housing assistance and utility allowance payments cited in this	
		finding.	
2007-CH-1010-002-A	7/20/2007		\$32,886
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$52,421 from nonfederal funds in associated	
		administrative fees for the 402 units that were more than 30 days late in receiving their	
2007-CH-1014-001-F	9/24/2007	annual inspections.	\$37,831
		We recommend that the director of HUD's Chicago Office of Public Housing require the	
		Authority to review the remaining 36 (70 minus 34) zero-income households as of	
		September 11, 2006, to determine whether they had unreported income. For	
		households that received excessive housing assistance and utility allowance payments,	
		the Authority should pursue collection and/or reimburse its program the applicable	
2007-CH-1010-003-C	7/20/2007	amount from nonfederal funds.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
	14		\$4,977,549

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Execute loan agreements between the City and its Agency indicating specific loan terms for	
		repayment of the loans totaling \$139,201,997 (\$63,072,960 principal and \$76,129,037	
		interest), which would result in an estimated additional recovery of \$7,269,854 in CDBG	
2009-LA-1005-002-A	12/30/2008	program income over the first year.	\$64,039,600
		Review all of the remaining 392 grants coded ineligible or lacking an eligibility determination	
2008-AO-1002-001-C	1/30/2008	and either support or repay \$14,697,812 disbursed for them.	\$4,615,112
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to provide supporting documentation or reimburse its program \$587,022 from	
		nonfederal funds for the unsupported payments related to the 59 households cited in this	
2008-CH-1006-002-D	4/15/2008	finding.	\$587,022
2008-AO-1002-001-A	1/30/2008	Repay \$743,344 disbursed for the 17 ineligible grants to its Road Home program.	\$403,904
		Request from responsible management agents supporting documentation for the \$265,412	
		in unsupported costs charged to the project so that the eligibility of these costs can be	
		determined. For any amounts determined to be ineligible, the project owner should repay	
		or seek reimbursement from responsible management agent to pay the project from non-	
		project funds or remove payables from the project's accounting.	
2009-BO-1002-001-E	11/6/2008		\$265,412
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to reimburse its program \$192,854 (\$113,973 for overpaid housing assistance,	
		\$17,257 for overpaid utility allowances, and \$61,624 in associated administrative fees) for	
2008-CH-1006-002-A	4/15/2008	the 63 households cited in this finding from nonfederal funds.	\$192,854
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to provide supporting documentation or reimburse its Public Housing program	
		\$153,223 (\$22,092 for household eligibility and \$131,131 for continued occupancy) from	
		nonfederal funds for the unsupported operating subsidies related to the 36 household files	
2008-CH-1003-001-A	2/15/2008	cited in this finding.	\$153,223

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Authority to provide documentation to support its allocation of time spent correctly	
		administering its Family Self-Sufficiency Program or reimburse its program's undesignated	
		fund balance for administration account from nonfederal funds the appropriate portion of	
		the \$151,661 in Coordinator funds received for fiscal years 2004 and 2005 that were	
2008-CH-1007-003-G	4/18/2008	incorrectly administered.	\$151,661
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to provide support that the use of \$82,774 (\$27,286 to three family members,	
		\$23,418 to two independent contractors, \$22,150 to CLM Architects, and \$9,920 to Harold	
		Dunne, Attorney at Law) in Public Housing program funds for housing maintenance, cleaning,	,
		and professional services were reasonable or reimburse its program from nonfederal funds	
2008-CH-1003-002-B	2/15/2008	for the applicable amount.	\$82,774
		Reimburse or require the responsible management agent(s) to reimburse \$64,601 to the	
		project for ineligible project costs of \$15,331 and for ineligible administrative, site	
		supervisor, HUD 202 and site management fees of \$49,270.	
2009-BO-1002-001-B	11/6/2008		\$64,601
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to provide supporting documentation for the use of \$61,202 for work	
		performed under its Public Housing Capital Fund program or reimburse its program from	
2008-CH-1003-002-A	2/15/2008	nonfederal funds for the applicable amount.	\$61,202
		Reimburse its program \$55,047 from nonfederal funds (\$50,356 for housing assistance	
		payments and \$4,691 in associated administrative fees) for the 28 units that materially failed	
2008-CH-1016-001-B	9/29/2008	to meet HUD's housing quality standards.	\$51,815
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to reimburse its program \$47,543 (\$36,748 for housing assistance payments and	
		\$10,795 for utility allowance payments) from nonfederal funds for the inappropriate housing	
2008-CH-1006-003-A	4/15/2008	assistance payments related to the 17 households cited in this finding.	\$47,543
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$52,737 from nonfederal funds for the overpayment of	
2008-CH-1005-001-A	4/10/2008	housing assistance and utility allowances cited in this finding.	\$46,791

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to pursue collection from the applicable households or reimburse its program	
		\$46,619 from nonfederal funds for the overpayment of housing assistance and utility	
2008-CH-1005-003-A	4/10/2008	allowances cited in this finding.	\$46,619
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its program \$46,478 from nonfederal funds for the 34 units cited in	
2008-CH-1013-001-A	9/24/2008	this finding that were in material noncompliance.	\$46,478
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to reimburse its program \$41,094 from nonfederal funds (\$37,280 for program	
		housing assistance payments and utility allowances plus \$3,814 in associated administrative	
		fees) for the 38 units that materially failed to meet HUD's housing quality standards and/or	
		the Corporation's housing standards.	
2008-CH-1006-001-A	4/15/2008		\$41,094
		Ensure that \$23,499 for unreasonable late charges on fuel bills and sewer lien penalties and	
		\$6,779 for unreasonable payments to a lawn care company be reimbursed to the project	
		from non-project funds.	
2009-BO-1002-001-D	11/6/2008		\$30,278
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its Public Housing program \$28,663 (\$16,262 plus \$12,401) from	
		nonfederal funds for the lost total household payments for 23 households cited in this	
2008-CH-1003-001-B	2/15/2008	finding.	\$28,663
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its program \$29,148 from nonfederal funds for the seven long-	
2008-CH-1013-002-A	9/24/2008	term vacant units it inappropriately included in its program operating subsidy calculations.	\$26,538
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to provide documentation to support its allocation of time spent correctly	
		administering the Family Self-Sufficiency Program or reimburse its Coordinator funds from	
		nonfederal funds the appropriate portion of the \$72,235 used when the Authority's Family	
2008-CH-1005-002-E	4/10/2008	Self-Sufficiency Program was incorrectly administered.	\$21,965

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$14,603 from nonfederal funds for the inappropriate	
2008-CH-1005-001-C	4/10/2008	administrative fees related to the 32 households in this finding.	\$14,603
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$14,576 from nonfederal funds for the escrow funds	
2008-CH-1005-002-A	4/10/2008	overpaid to the seven participants cited in this finding.	\$13,662
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse the appropriate households \$13,070 for the underpayment of	
2008-CH-1003-001-C	2/15/2008	housing assistance and utility allowance payments cited in this finding.	\$13,070
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to reimburse its program \$9,815 from nonfederal funds for the program	
2008-CH-1006-002-C	4/15/2008	administrative fees related to the underpaid housing assistance payments.	\$9,815
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its Public Housing program \$7,932 in operating subsidies from	
2008-CH-1003-001-F	2/15/2008	nonfederal funds for the two properties sold by the City.	\$4,532
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$11,225 from nonfederal funds for the inappropriate	
2008-CH-1005-003-B	4/10/2008	administrative fees related to the 47 households cited in this finding.	\$1,023
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to determine the appropriate administrative fees for the applicable households for	
		which it is unable to provide supporting documentation cited in recommendation 2D and	
2008-CH-1006-002-E	4/15/2008	reimburse its program the applicable amount from nonfederal funds.	\$0

28 \$71,061,854

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to provide supporting documentation or reimburse its program \$2,081,512 from	
2009-CH-1002-003-B	1/23/2009	nonfederal funds for the 11 Section 8 project-based projects cited in this finding.	\$2,081,512
2009-AO-1002-001-B	5/5/2009	Either support or repay \$441,027 disbursed for five unsupported grants.	\$441,027
		Provide documentation to support the source and use of \$801,000 transferred into and	
		withdrawn from its nonfederal account or reimburse HUD or the appropriate programs	
2010-PH-1801-002-B	12/17/2009	from nonfederal sources for any amounts that it cannot support.	\$416,568
2009-AO-1002-001-A	5/5/2009	Repay \$294,060 disbursed for three ineligible grants to its Road Home program.	\$294,060
		Deposit \$254,470 for the ineligible disbursements \$236,439 + \$12,559 + \$5,472. cited in	
		this report into the project's reserve for replacement or a restricted capital account that	
2009-BO-1009-001-A	8/4/2009	requires HUD approval for the release of the funds.	\$254,470
2009-AO-1001-001-A	5/5/2009	Repay \$228,930 disbursed for five ineligible grants to its Road Home program.	\$228,930
		Provide documentation to support the \$282,000 expended to acquire and dispose of the	
		vacant commercial building or reimburse the applicable program from nonfederal	
2010-PH-1801-001-B	12/17/2009	sources for any amounts that it cannot support.	\$225,600
		We recommend that the Director of HUD's Cleveland Office of Public Housing require the	
		Agency to reimburse its program \$211,680 from nonfederal funds for the Section 8	
		administrative fees received related to its inappropriate program administration cited in	
		this finding.	
2009-CH-1002-003-A	1/23/2009		\$211,680
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to review the remaining 284 (333 minus 49) households claiming zero income	
		as of October 2, 2008, to determine whether the households had unreported income. For	
		households that received excessive housing assistance and utility allowance payments,	
		the Authority should pursue collection and/or reimburse its program the applicable	
2009-CH-1007-002-D	4/28/2009	amount from nonfederal funds.	\$183,889
		Provide documentation to support payments totaling \$180,000 for insurance or	
		reimburse HUD or the applicable program from nonfederal sources for any amounts that	
2010-PH-1801-001-D	12/17/2009	it cannot support.	\$180,000

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Require the Authority to propose a legal solution regarding the ownership structure of	
		the nonprofit organization. If a legal solution is not possible, the Director should require	
		the Authority to repay its public housing program \$221,531 in nonfederal funds or the	
2009-AT-1009-002-A	7/20/2009	current amount owed that the Authority advanced to its nonprofit organization.	\$155,911
		Repays the voucher program fund from nonfederal sources \$64,528 in improper housing	
2009-KC-1005-001-B	3/2/2009	assistance.	\$58,059
		We recommend that the Director, Office of Public Housing, New York, instruct Authority	
2009-NY-1011-002-G	5/15/2009	officials to seek repayment of \$50,237 in ineligible housing assistance payments.	\$50,237
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to pursue collection from the applicable households or reimburse its program	
		\$31,668 from nonfederal funds for the overpayment of housing assistance due to	
		unreported income.	
2009-CH-1007-001-C	4/28/2009		\$26,044
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$25,074 from nonfederal funds for the overpayment	
2009-CH-1007-001-A	4/28/2009	of housing assistance cited in this finding.	\$25,074
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to pursue collection from the applicable households or reimburse its program	
		\$41,044 (\$41,569 minus \$525) from nonfederal funds for the overpayment of housing	
2009-CH-1007-002-A	4/28/2009	assistance cited in this finding.	\$19,583
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$19,071 from nonfederal funds for the improper	
2009-CH-1007-001-H	4/28/2009	administrative fees related to the households cited in this finding.	\$19,071
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to provide support or reimburse its program \$16,487 from non federal funds	
		for the unsupported overpayment of housing assistance and utility allowances for the	
2009-CH-1007-001-D	4/28/2009	nine households cited in this finding.	\$14,336

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Provide documentation to support payments totaling \$132,000 for vehicle services or	
		reimburse HUD or the applicable program from nonfederal sources for any amounts that	
2010-PH-1801-001-C	12/17/2009	it cannot support.	\$10,400
		Pursue double damages remedies against the responsible parties for the	
		ineligible/inappropriate and applicable portion of the unsupported disbursements that	
		were used in violation of the project's regulatory agreement.	
2009-BO-1009-001-H	8/4/2009		\$0
		Revise the PBCA initiative guides (e.g., the monitoring and evaluation guide and the	
		Section 8 guidebook) to clarify inconsistencies or unclear guidance for monitoring the	
		PBCAs including clarification of PBCA performance that requires issuing incentive fees or	
2009-SE-0003-001-A	9/1/2009	assessment of disincentives.	\$0
		Ensure that HUD staff follow the revised guidance when conducting the annual	
		compliance reviews and monthly remote reviews to ensure that it receives quality work	
2009-SE-0003-001-B	9/1/2009	and the best value for funds spent on contract administration activities.	\$0
		Reassess the resources allocated to overseeing the PBCAs to ensure that the resources	
2009-SE-0003-001-C	9/1/2009	are sufficient to monitor their performance.	\$0

23 \$4,896,451

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Determine the eligibility of the \$9,027,082 disbursed for projects with signs of slow	
		progress and reevaluate the feasibility of these activities. The Government of Puerto	
		Rico must reimburse HUD from non-Federal funds for activities that HUD determines	
		to have been terminated and reprogram and put to better use any unexpended funds	
2010-AT-1011-001-B	8/25/2010	associated with the terminated activities.	\$9,027,082
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to provide supporting documentation or reimburse its program \$3,861,652	
		(\$3,483,294 in housing assistance payments plus \$378,358 in associated program	
		administrative fees) from non-Federal funds for the housing assistance payments and	
		associated administrative fees for the unsupported program projects cited in this	
2010-CH-1008-001-A	6/15/2010	finding.	\$3,861,652
		Require the Authority to reimburse the net restricted assets fund account from non-	
2010-AT-1010-001-B	8/23/2010	Federal funds the \$2,583,244 or the current amount owed.	\$1,969,809
		Require the Department to collect \$1,269,032 associated with the 17 overdue loans	
		and put the program income generated to better use in accordance with HUD	
2010-AT-1006-003-A	6/11/2010	requirements.	\$1,269,032
		Require the Authority to provide support that \$446,918 in contracts were fairly and	
		openly competed or reimburse its public housing and capital improvement program	
2010-AT-1003-001-I	4/28/2010	from nonfederal funds.	\$446,918
		Deobligate \$279,245 in available funds associated with the ineligible CHDO and	
		reprogram the funds for other eligible HOME activities, thereby putting the funds to	
2011-PH-1005-003-B	12/23/2010	better use.	\$279,245
		Require the Authority to provide support for the \$275,282 in capital fund drawdowns	
2010-AT-1003-001-J	4/28/2010	or reimburse its capital improvement program from nonfederal funds.	\$275,282
		Require the Authority to provide support for \$264,229 in disbursements or repay any	
		unsupported costs to its public housing operating and capital improvement program	
2010-AT-1003-001-F	4/28/2010	from nonfederal funds.	\$264,229
		Require the Authority to account for \$134,889 in tenant rent receipts or repay any	
2010-AT-1003-001-D	4/28/2010	unsupported amounts to its public housing operating program from nonfederal funds.	\$134,889

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Provide documentation to demonstrate that \$1,945,050 was used for eligible activities	
		that met the criteria of its HUD-approved budget line items or repay HUD from non-	
2010-PH-1008-001-B	5/11/2010	Federal funds.	\$77,403
		We recommend that the Director, Office of Public Housing, New York, instruct the	
		Authority to reimburse from non-Federal funds the \$219,715 expended for ineligible	
2010-NY-1011-001-A	4/7/2010	costs as follows; \$215,402 to HUD, and \$4,313 to the 2007 ROSS Family grant.	\$62,633
		Require the Authority to support the \$27,097 in unreasonable costs or reimburse its	
2010-AT-1003-001-H	4/28/2010	public housing and capital improvement program from nonfederal funds.	\$27,097
		Require the Authority to reimburse its public housing program \$2,250 for ineligible	
2010-AT-1003-001-G	4/28/2010	costs using non-federal funds.	\$2,250
		Require the Department to review all grant agreements for each activity entered into	
		HUD's information system and correct any inaccurate information, including funding	
2010-AT-1006-004-B	6/11/2010	amount, activity status, and fund type classification.	\$0
		Recapture any shortfalls generated by the closure and deobligation of funds associated	
		with recommendations 1C and 1D that do not meet statutory requirements for the	
		timely commitment and expenditure of funds pursuant to the National Defense	
		Authorization Act of 1991 and/or Title II of the Cranston-Gonzalez National Affordable	
2010-AT-1011-001-E	8/25/2010	Housing Act, as amended.	\$0

15 \$17,697,521

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Direct responsible grantees to justify the use of \$66,849,658 that it disbursed for cancelled	
2012-PH-0001-001-B	10/31/2011	Block Grant program activities or repay HUD from non-Federal funds.	\$66,849,658
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct the City to provide documentation to justify the \$20,143,219	
		(\$4,902,754 \$15,240,465) in unsupported transactions recorded in the CDBG program	
		income account. Any receipts determined to be unrecorded program income should be	
		returned to the CDBG program, and any expenditures determined to be ineligible should be	
2011-NY-1010-002-B	4/15/2011	reimbursed from non-Federal funds.	\$5,290,982
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development require the City to suspend incurring costs and/or reimbursing itself for costs	
		paid from the City's municipal general expense account for economic development activities	
		until HUD determines whether the City has the capacity to carry out its CDBG economic	
		development activities in compliance with HUD regulations. If it is determined that the City	
		lacks the capacity, the \$4,739,829 in economic development projects funds remaining for	
		fiscal years 2008, 2009, and 2010 should be reprogrammed so the City can assure HUD that	
2011-NY-1010-002-A	4/15/2011	these funds will be put to better use.	\$4,739,829
		Require the Municipality to reimburse the HOME program from non-Federal funds \$2,263,799	
2011-AT-1018-002-C	9/28/2011	paid for ineligible costs.	\$4,015,259
		Require the Municipality to put to better use \$2,854,395 associated with unexpended funds	
2011-AT-1018-002-D	9/28/2011	maintained in its local bank account.	\$2,854,395
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$2,828,244 (\$2,609,362 in housing assistance payments	
		and \$218,882 in associated administrative fees) from non-Federal funds for the housing	
		assistance payments and associated administrative fees for the 146 households cited in this	
2011-CH-1006-003-A	3/23/2011	finding.	\$2,535,854
		Support or repay from non-Federal funds any amounts that it cannot support, including	
		\$1,568,245 to its operating fund and \$973,126 to its capital fund paid for (1) contracts that	
		were improperly procured, (2) contract overpayments, or (3) contract payments made	
2011-AO-0001-001-A	6/22/2011	outside of the contract effective dates.	\$2,541,371

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Chicago Office of Public Housing require the	
		Authority to reimburse its program \$2,303,853 from non-Federal funds for the unallowable	
2011-CH-1006-002-A	3/23/2011	transactions cited in this finding.	\$2,111,190
		We further recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct the City to provide documentation to justify the \$1,982,988 in	
		unsupported costs associated with street improvement expenditures incurred between June	
		2007 and October 2009. Any unsupported costs determined to be ineligible should be	
2011-NY-1010-001-C	4/15/2011	reimbursed from non-Federal funds.	\$1,982,988
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its Capital Fund \$1,539,629 from non-Federal funds for the	
2011-CH-1012-002-A	8/9/2011	ineligible payments cited in this finding.	\$1,539,629
		Require the Municipality to submit all supporting documentation showing the eligibility and	
		propriety of \$1.5 million charged to the HOME program for the development of the Villas de	
2011-AT-1006-002-A	4/8/2011	Felisa housing project or reimburse the program from non-Federal funds.	\$798,000
		Require the Municipality to reimburse its HOME program from non-Federal funds \$766,480	
2011-AT-1018-001-C	9/28/2011	for disbursements associated with terminated activities that did not meet HOME objectives.	\$766,480
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development require the City to suspend incurring costs and/or reimbursing itself for costs	
		paid from the City's municipal general expense account for clean and seal activities until HUD	
		determines whether the City has the capacity to carry out its CDBG clean and seal activities in	
		compliance with HUD regulations. If it is determined that the City lacks the capacity,	
		\$744,479 in fiscal year 2010 clean and seal program funds should be reprogrammed so the	
2011-NY-1010-003-A	4/15/2011	City can assure HUD that these funds will be put to better use.	\$744,479
		We further recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct the City to provide documentation to justify the \$716,622 (\$545,607	
		\$24,069 \$146,946) in unsupported clean and seal costs incurred so that HUD can make an	
		eligibility determination. Any costs determined to be ineligible should be reimbursed from	
2011-NY-1010-003-C	4/15/2011	non-Federal funds.	\$716,622

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		As related to DHAP, support or repay from non-Federal funds any amounts that it cannot	
		support for a total of \$435,442 to its operating fund, which includes (1) \$140,966 and \$96,525	
		disbursed to two DHAP case managers who were paid without an executed contract and for	
		unsubstantiated, excessive salary increases; and (2) \$197,951 disbursed to the three DHAP	
2011-AO-0001-001-J	6/22/2011	case managers for unsubstantiated, excessive salary increases.	\$435,442
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
2011-CH-1012-002-B	8/9/2011	Commission to return the \$411,228 in excess capital fund draws cited in this finding.	\$411,228
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to provide supporting documentation or reimburse its Capital Fund \$394,683	
2011-CH-1012-002-D	8/9/2011	from non-Federal funds for the unsupported costs cited in this finding.	\$394,683
		We recommend that the Director of HUD's New York City Office of Community Planning and	
		Development instruct City officials to provide documentation to justify the \$329,937 in	
		unsupported salary costs incurred between June and September 2010. Any unsupported	
2012-NY-1002-001-B	10/18/2011	costs determined to be ineligible should be reimbursed from non-Federal funds.	\$329,937
		We further recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct the City to reimburse from non-Federal funds the \$304,506 related to	
2011-NY-1010-003-B	4/15/2011	ineligible clean and seal code enforcement costs.	\$304,506
		Determine the eligibility of the \$2,399,428 disbursed for four projects with signs of slow	
		progress and reevaluate the feasibility of the activities. Total disbursements of \$3,483,086	
		were adjusted to consider \$713,008 questioned in recommendation 2C and \$370,650 in	
		recommendation 2A. The Municipality must reimburse its HOME program from non-Federal	
2011-AT-1018-001-A	9/28/2011	funds for activities that HUD determines to have been terminated.	\$292,862
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its appropriate programs \$180,649 from non-Federal funds for the	
2011-CH-1012-003-A	8/9/2011	ineligible payments cited in this finding.	\$180,649
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its Capital Fund \$127,050 from non-Federal funds for the ineligible	
2011-CH-1012-004-A	8/9/2011	payments cited in this finding.	\$127,050

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development reimburse from non-Federal funds \$162,923 (\$134,711 \$28,212) expended on	
		ineligible costs pertaining to street improvement projects not done and a duplicate	
2011-NY-1010-001-B	4/15/2011	reimbursement.	\$120,199
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its operating fund \$107,692 from non-Federal funds for ineligible	
2011-CH-1012-004-B	8/9/2011	payments cited in this finding.	\$107,692
		We recommend that the Director of HUD's New York City Office of Community Planning and	
		Development instruct City officials to reimburse from non-Federal funds \$93,436 for ineligible	
		costs charged to HPRP; specifically, \$59,430 related to payments for rental arrears over the 6-	
2012-NY-1002-001-A	10/18/2011	month eligibility requirement and \$34,006 for payments issued directly to participants.	\$34,006
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to provide supporting documentation or reimburse its appropriate programs	
2011-CH-1012-003-B	8/9/2011	\$30,236 from non-Federal funds for the unsupported costs cited in this finding.	\$27,988
		Require the Municipality to reimburse its HOME treasury account or HUD, as appropriate,	
		from non-Federal funds \$273,009 paid for land acquired for the Villas de Felisa housing	
2011-AT-1006-001-D	4/8/2011	project that did not provide the intended benefits.	\$18,715
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its Capital Fund \$13,085 from non-Federal funds for the	
2011-CH-1012-002-F	8/9/2011	inappropriately earned interest cited in this finding.	\$13,085
		Require the Municipality to submit supporting documentation showing the allocability of	
		\$39,338 and any additional payroll costs charged to the HOME program between July 1, 2009,	
		and June 30, 2011, associated with the three employees performing other functions not	
2011-AT-1018-002-B	9/28/2011	related to the program, or reimburse the program from non-Federal funds.	\$6,875
		We further recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct the City to establish and implement controls that will ensure adequate	
		monitoring of subrecipient-administered activities, that CDBG funds are properly	
		safeguarded, the achievement of performance goals in subrecipient supported activities, and	
2011-NY-1010-002-D	4/15/2011	that corrective actions are taken for nonperforming subrecipients.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Require the Municipality to develop and implement a financial management system in	
		accordance with HUD requirements, including that HOME funds can be traced to a level which	
		ensures that such funds have not been used in violation of the restrictions and prohibitions of	
2011-AT-1018-002-G	9/28/2011	applicable statutes and that funds are disbursed in a timely manner.	\$0
		Require the Municipality to update its accounting records and ensure that receipts and	
		expenditures are properly accounted for, are reconciled with HUD's information system, and	
2011-AT-1018-002-F	9/28/2011	comply with HUD requirements.	\$0
		Establish and implement procedures to reassess the safe harbor percentage and rates	
		periodically to ensure that they are reasonable. HUD should retain the documentation	
		justifying the calculation of those percentages and rates. In addition, HUD should assess the	
		feasibility of requiring the agencies to periodically justify and retain documentation showing	
2012-LA-0001-001-A	11/16/2011	the reasonableness of using the maximum rates, or lower them as appropriate.	\$0

\$100,291,653

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Reimburse its business development loan program \$5,999,894 from non-Federal funds	
2013-PH-1001-001-A	10/31/2012	for the ineligible expenditures related to the Hotel Sterling project.	\$5,999,894
		Require the Municipality to develop and implement a financial management system in	
		accordance with HUD requirements and ensure that \$3,213,572 in HOME funds drawn	
		from HUD between July 1, 2009, and December 31, 2011, can be traced to a level which	
		ensures that such funds have not been used in violation of the restrictions and	
		prohibitions of applicable statutes or reimburse the HOME program from non-Federal	
		funds.(Footnote 2) Total disbursements of \$3,523,723 were adjusted to consider	
		\$173,978 questioned in recommendation 1B, \$86,567 questioned in recommendation	
2012-AT-1009-001-A	5/23/2012	1D, and \$49,606 questioned in recommendation 2B.	\$3,213,572
		Determine the eligibility of the \$537,773 disbursed for the Ciudad de Ensueño project	
		and reevaluate the feasibility of the activity. (Footnote 9) Total disbursements of	
		\$538,973 were adjusted to consider \$1,200 questioned in recommendation 1F. The	
		Municipality must reimburse its HOME program from non-Federal funds if HUD	
2012-AT-1009-002-B	5/23/2012	determines the activity to have been terminated.	\$537,773
		We recommend that the Program Center Coordinator of the Hartford Office of Public	
		Housing support that \$2,506,434 in contract costs charged to Federal programs was	
		reasonable and supportable, and repay any amounts it cannot support with non-Federal	
2012-BO-1002-001-J	3/14/2012	funds.	\$242,121
		Support that \$304,780 in Recovery Act change orders was provided at a reasonable cost	
		and repay any amount determined to be unreasonable from non-Federal funds to the	
2012-KC-1002-002-B	3/2/2012	U.S. Treasury.	\$173,142
		Require the Municipality to submit supporting documentation showing the allocability	
		and eligibility of \$114,139 charged to the HOME program for project delivery costs or	
2012-AT-1009-001-C	5/23/2012	reimburse the program from non-Federal funds.	\$114,139
		Provide adequate documentation for \$86,575 in salaries and office expenses related to	
2012-PH-1011-001-G	8/3/2012	downpayment assistance activities or repay the Program from non-Federal funds.	\$86,575
2017-LU-1011-001-Q	0/3/2012	adwindayment assistance activities of repay the Frogram from hon-rederal funds.	300,373

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to provide supporting documentation or reimburse its program \$17,008	
2012-CH-1012-001-H	9/27/2012	from non-Federal funds for the unsupported payments cited in this finding.	\$15,661
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse its program \$21,650 form non-Federal funds for the	
2012-CH-1012-001-A	9/27/2012	overpayment of escrow funds to the participants cited in this finding.	\$12,548
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse \$11,289 (the difference between the contract paid price of	
		\$33,638 and the lesser calculated cost of \$ 22,349) from non-Federal funds to HUD for	
2012-CH-1002-006-A	1/26/2012	transmission to the U.S. Treasury for the cost savings cited in this finding.	\$7,602
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to reimburse \$22,430 (\$16,335 \$6,095) from non-Federal funds to HUD for	
		transmission to the U.S. Treasury for the projects that had Section 3 funds included but	
2012-CH-1002-003-B	1/26/2012	not remitted to the Commission's Section 3 training fund.	\$2,803
		Develop and implement a financial management system in accordance with HUD	
2013-AT-1001-001-A	11/30/2012	requirements.	\$0
		Implement control policies or procedures to at least annually coordinate with HUD's	
		Office of Public Housing to match data in the Single Family Data Warehouse to data in	
		the Public Housing Information Center to prevent or mitigate instances of borrowers	
		violating Program residency requirements by renting their properties to Section 8	
2013-PH-0002-001-B	12/20/2012	voucher participants.	\$0

12 \$10,405,830

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Detroit Office of Multifamily Housing	
		Programs require the Authority to ensure that \$31,148,477 in residual receipts for the	
		15 projects as of May 31, 2013, is used to reduce or offset housing assistance	
2013-CH-1011-001-A	9/30/2013	payments in accordance with HUD's requirements.	\$31,148,477
		We recommend that the Director of HUD's Cleveland Office of Public Housing require	
		the Authority to provide supporting documentation or reimburse its operating reserve	
		fund \$4,003,683 (\$3,610,666 \$227,500 \$111,856 \$39,189 \$14,472) from non-	
		Federal funds for the unsupported salary and benefit payments; operating	
		contribution payments; and lawn maintenance, snow removal, utility, and training	
2013-CH-1003-001-D	7/15/2013	costs for the developments and program cited in this finding.	\$4,003,683
		Provide for HUD review documentation to support \$5,014,403 drawn for the	
2014-PH-1001-001-C	12/17/2013	additional 15 activities.	\$2,709,343
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to expend or reprogram to other eligible program	
		activities the \$2,451,645 in CDBG program income maintained in the City's community	
		development bank accounts as of June 30, 2013, so the City can assure HUD that these	
2013-NY-1010-001-A	9/26/2013	funds have been put to better use.	\$2,451,645
		Require the State to provide supporting documentation for the \$2,158,715 acquisition	
		of property for projects W19, S21, and S20 or reimburse the program from non-	
2014-AT-1004-001-B	12/30/2013	Federal funds.	\$2,158,715
		We recommend that the Director of HUD's Cleveland Office of Public Housing require	
		the Authority to reimburse its operating reserve fund \$2,773,976 (\$2,583,429	
		\$190,547) from non-Federal funds for the inappropriate transfers to its cost center	
2013-CH-1003-001-B	7/15/2013	and salary and benefit payments cited in this finding.	\$2,074,452
		Reimburse its HOME program \$1,595,113 from non-Federal funds for HOME funds	
2013-LA-1009-001-A	9/13/2013	that were inappropriately used on Section 8 housing assistance payments.	\$1,595,113
		Provide adequate supporting documentation for the \$1,628,130 in unsupported salary	
2013-LA-1010-001-A	9/20/2013	and benefit costs or repay the CDBG program from non-Federal funds.	\$1,210,240

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Require the Municipality to provide support showing the allocability and eligibility of	
		\$1,077,577 spent on salaries and fringe benefits for employees who performed local	
		government duties and multiple federally funded activities without properly allocating	
		the costs directly related to carrying out each activity. Any amounts determined	
2013-AT-1003-002-B	3/22/2013	ineligible must be reimbursed to the Block Grant program from non-federal funds.	\$1,077,577
		We recommend that the Director of HUD's Cleveland Office of Public Housing require	
		the Authority to reimburse its capital fund \$3,569,942 (\$3,319,942 \$250,000) from	
		non-Federal funds for the ineligible drawdowns and disbursements cited in this	
2013-CH-1003-001-A	7/15/2013	finding.	\$1,019,508
		Require the owner to provide documentation to support the \$709,753 in unsupported	
		disbursements identified by the audit or reimburse the project's reserve for	
		replacement account from non-Federal funds for any disbursements that it cannot	
2013-PH-1804-001-B	7/22/2013	support.	\$709,753
		Provide documentation to support the \$2,455,162 in unsupported funds drawn for 12	
2014-PH-1001-001-A	12/17/2013	activities or repay the amount to its program from non-Federal funds.	\$648,650
		We recommend that the Director of HUD's Detroit Office of Multifamily Housing	
		Programs require the Authority to reimburse the U.S. Treasury \$608,337 (\$77,856	
2013-CH-1011-002-A	9/30/2013	436,759 \$93,722) for the three projects with terminated program contracts.	\$608,337
		We recommend that the Director of HUD's Detroit Office of Multifamily Housing	
		Programs require the Authority to obtain approval from HUD to apply the project's	
		replacement reserves to the defaulted mortgage for contract number MI28H150191 or	
2013-CH-1011-002-B	9/30/2013	reimburse the U.S. Treasury \$604,949.	\$604,949
		Require the Municipality to reimburse from non-federal funds \$552,658 in	
		unallowable and unallocated costs associated with the disbursement of salaries and	
		fringe benefits of employees who did not perform duties directly related to carrying	
2013-AT-1003-002-A	3/22/2013	out activities charged with the program delivery costs.	\$552,658

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Detroit Office of Public Housing require the	
		Commission to support or reimburse its program \$425,193 (\$19,924 \$384,755 in	
		housing assistance payments \$46 in utility allowances \$20,468 in associated	
		administrative fees) from non-Federal funds for the unsupported overpayment of	
		housing assistance and utility allowances due to unsupported calculations, missing	
		eligibility documentations, and discrepancies in the housing assistance payments	
2013-CH-1004-001-C	8/1/2013	register.	\$410,534
		Provide to HUD a remediation plan for the 10 delayed activities and demonstrate that	
		national objectives have been met as required to support \$4,078,941 in program funds	
2014-PH-1001-001-B	12/17/2013	drawn for the activities.	\$355,398
		Require the Municipality to submit all supporting documentation showing that 21	
		home-buyer activities met the principal residency requirement for the duration of the	
		period of affordability or reimburse the HOME program from non-Federal funds the	
2014-AT-1001-001-B	12/3/2013	\$307,537 disbursed.	\$307,537
		We recommend that the Director of HUD's Detroit Office of Multifamily Housing	
		Programs require the Authority to reimburse \$290,437 to the appropriate project	
		escrows from non-Federal funds for the inappropriate disbursement of replacement	
2013-CH-1011-003-A	9/30/2013	reserves.	\$290,437
		Repay \$287,655 paid to the executive director's and another Authority employee's	
		family members to its public housing program. However, if the Authority made any of	
		the expenditures from its 2008 capital fund grant, or if the Authority is unable to	
		determine the source of funds used to pay expenditures, the Authority should repay	
2013-FW-1805-001-A	9/26/2013	HUD. Any repayments must be from non-Federal funds.	\$287,655
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct County officials to provide documentation to justify the	
		\$189,322 in unsupported administrative and planning costs that was disbursed for	
		employee salaries and fringe benefits. Any unsupported costs determined to be	
2013-NY-1006-001-A	5/13/2013	ineligible should be reimbursed from non-Federal funds.	\$189,322

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support or repay its public housing programs \$180,379 for HUD funds inappropriately	
2013-FW-1802-001-D	6/21/2013	used for Sunnybrook. Repayment should be from non-Federal funds.	\$180,379
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to Provide documentation to justify the \$177,923	
		unsupported difference between the City's CDBG program income balance in IDIS and	
		its bank account balances as of June 30, 2013. Any portion of the unsupported	
2013-NY-1010-001-D	9/26/2013	difference determined to be ineligible should be reimbursed from non-Federal funds.	\$177,923
2010 111 1010 001 0	3,20,2023	We recommend that the Director of HUD's Detroit Office of Multifamily Housing	Ų177J323
		Programs require the Authority to reimburse appropriate escrow accounts \$175,434	
2013-CH-1011-003-B	9/30/2013	from non-Federal funds for the lost interest cited in this finding.	\$175,434
	3,00,000	6	7 - 1 - 1 - 1
		Transition the PHA NRA excess funds, which are as much as \$643.6 million as of June	
2014-FO-0003-002-A	12/16/2013	30, 2013, to HUD's control as soon as possible to safeguard the program resources.	\$156,524
		Require the owner to deposit \$138,862 from non-Federal funds into the project's	
2013-PH-1804-001-A	7/22/2013	reserve for replacement account for the ineligible costs identified by the audit.	\$138,862
		Support or repay \$135,995 for unsupported procurement expenditures. The funds	
		should be repaid to the Authority's public housing program. However, if the Authority	
		made any of the expenditures from its 2008 capital fund grant, or if the Authority is	
		unable to determine the source of funds used to pay expenditures, the Authority	
2013-FW-1805-001-G	9/26/2013	should repay HUD. Any repayments must be from non-Federal funds.	\$135,995
		Submit all supporting documentation showing the eligibility and propriety of \$89,331	
		in unaccounted for program income and recaptured funds or reimburse the HOME	
2013-AT-1006-001-D	7/23/2013	program from non-Federal funds.	\$89,331
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct County officials to reimburse from non-Federal funds	
		\$78,530 for ineligible home-buyer rehabilitation and demolition costs charged to the	
2013-NY-1006-001-B	5/13/2013	HOME program.	\$78,530

Repay \$65,360 paid from Recovery Act funds to the executive director's and another Authority employee's family members to HUD for its transmission to the U.S. Treasury. Repayment must be from non-Federal funds. Support or repay \$42,150 in unsupported additional compensation paid to Authority staff. The funds should be repaid to the Authority's public housing program. However, if the Authority made any of the expenditures from its 2008 capital fund grant, or if the Authority is unable to determine the source of funds used to pay expenditures, the Authority should repay HUD. Any repayments must be from non-Federal funds. Support or repay \$31,513 in unsupported equipment and supplies costs. The funds should be repaid to the Authority's public housing program. However, if the Authority made any of the expenditures from its 2008 capital fund grant, or if the Authority is unable to determine the source of funds used to pay expenditures, the Authority should repay HUD. Any repayments must be from non-Federal funds. \$31,51 We recommend that the Director of HUD's New York Office of Community Planning and Development instruct County officials to terminate the contract between the County and the Village of Freeport to rehabilitate and construct single-family public housing units to be sold to low-income residents. The remaining contract balance of \$31,470 should be put to better use by reprogramming it for other eligible purposes. We recommend that the Director of HUD's Detroit Office of Multifamily Housing Programs require the Authority to reimburse the U.S. Treasury \$12,830 from non-Federal funds. \$12,83 Require the State to provide supporting documentation for the \$7,200 in appraisal and Development instruct County officials to provide documentation to justify the \$1,264 in unsupported project delivery costs. Any unsupported costs determined to	Recommendation			
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			and Development instruct County officials to provide documentation to justify the	
			\$1,264 in unsupported project delivery costs. Any unsupported costs determined to	
	2013-NY-1006-001-D	5/13/2013	be ineligible should be reimbursed from non-Federal funds.	\$1,264

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Work with the Office of the Chief Information Officer to improve the deposit module's	
		reporting capabilities so that Labor Relations staff is able to report and analyze the	
2013-HA-0001-002-C	4/16/2013	deposit account transactions and taxes or replace the system.	\$0
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct County officials to develop controls that will ensure that	
		the County's decentralized record-keeping system is centralized for ready access to	
2013-NY-1006-003-C	5/13/2013	HOME documents.	\$0
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct County officials to develop controls to ensure that the	
		County's recently established debarment verification procedures are implemented for	
2013-NY-1006-002-D	5/13/2013	all future procurement activity.	\$0
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct County officials to document their application review	
		committee membership and provide evidence of the committee meetings and their	
		evaluation and rating of subrecipients to fully support their funding	
2013-NY-1006-002-A	5/13/2013	recommendations.	\$0
		Declare the project in default of its regulatory agreement and apply remedies	
2013-PH-1804-001-D	7/22/2013	available under the regulatory agreement up to and including foreclosure.	\$0
		Require the owner to calculate and support the amount of funds required to be on	
		deposit in the tenant security deposit account and deposit funds into the account, if	
		needed, so that the balance in the account is equal to or exceeds the amount of funds	
2013-PH-1804-001-C	7/22/2013	required to be in the account.	\$0
		Develop and implement additional system error checks to identify potential reporting	
2013-KC-0003-001-C	9/10/2013	issues.	\$0
		Complete the closeout of any remaining CDBG-R and HPRP grants and forward all	
2014-FO-0003-008-B	12/16/2013	grant closeout agreement certifications to OCFO for recapture.	\$0
		Ensure that PIH's automation of its cash management process complies with Federal	
2014-FO-0003-002-G	12/16/2013	financial management requirements.	\$0
		Review the cash management process to identify all financial events to be recognized	
		in accordance with GAAP. Establish procedures to account for the cash management	
2014-FO-0003-002-E	12/16/2013	activity in a timely manner in compliance with GAAP.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Implement a cost-effective method for automating the cash management process to	
2014-FO-0003-002-C	12/16/2013	include an electronic interface of transactions to the standard general ledger.	\$0
47	_		\$55,738,748

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs instruct	
		City officials to provide documentation to justify the \$183 million in unsupported	
		salary and fringe benefits and associated expenses charged to the CDBG-DR program.	
		If documentation provided does not support the costs, this amount should be repaid	
2015-NY-1001-001-A	11/24/2014	from non-Federal funds.	\$183,000,000
		Provide all supporting documentation associated with the \$10,838,880 (Footnote 13)	
		Total disbursements of \$10,876,095 were adjusted to consider \$37,215 questioned in	
		recommendation 1D. in State CDBG, Section 108, and program income proceeds	
		disbursed for the development of the sports complex, if HUD determines the plan to	
		be feasible (recommendation 1A). HUD must determine the eligibility,	
		reasonableness, and allocability of the funds disbursed. OCMA must reimburse its	
2014-AT-1801-001-B	3/20/2014	State CDBG program from non-Federal funds any amount determined ineligible.	\$10,838,880
		Update selection rules for CAIVRS to provide for complete reporting of all ineligible	
2014-KC-0002-001-B	7/2/2014	borrowers to put \$9.5 million to better use.	\$9,501,619
		Submit a plan for how it will proceed with respect to the Municipality of Dorado hotel	
		project, including a schedule that HUD can track to ensure its completion. HUD must	
		reevaluate the feasibility of the activity and determine the eligibility of the \$7,369,000	
		already invested. If HUD determines that the activity has been canceled or is not	
		feasible, Municipal Affairs must mitigate activity losses by committing any unused	
2015-AT-1001-001-B	12/5/2014	loan proceeds for future loan repayments.	\$7,369,000
		Submit a plan for how it will proceed with respect to the Municipality of San Lorenzo	
		activity center project, including a schedule that HUD can track to ensure its	
		completion. HUD must reevaluate the feasibility of the activity and determine the	
		eligibility of the \$7,010,276 already invested. (Footnote 6: Total investments of	
		\$7,999,275 were adjusted to account for \$988,154 questioned in recommendation 2A	
		and \$845 in recommendation 2C.) If HUD determines that the activity has been	
		canceled or is not feasible, Municipal Affairs must mitigate activity losses by	
2015-AT-1001-001-A	12/5/2014	committing any unused loan proceeds for future loan repayments.	\$7,010,276

		Submit a plan for how it will proceed with respect to the Municipality of Camuy hotel	
		project, including a schedule that HUD can track to ensure its completion. HUD must	
		reevaluate the feasibility of the activity and determine the eligibility of the \$5,474,376	
		already invested. (Footnote 7: Total investments of \$5,830,878 were adjusted to	
		account for \$436 questioned in recommendation 2A and \$356,066 in recommendation	
		2C.) If HUD determines that the activity has been canceled or is not feasible,	
		Municipal Affairs must mitigate activity losses by committing any unused loan	
2015-AT-1001-001-C	12/5/2014	proceeds for future loan repayments.	\$5,474,376
		Determine whether the documentation the State provided is adequate to support	
		\$3,487,461 disbursed for wages and salaries charged to the program by the	
		contractors' employees and if not, direct the State to repay HUD from non-Federal	
2014-PH-1008-001-C	8/29/2014	funds for any amount that it cannot support.	\$3,487,461
		Require the Authority to take action to reclaim its properties valued at \$2,032,266 to	
		improve its financial position, decrease its reliance on HUD program funding, and	
2015-FW-1801-001-C	10/2/2014	address its comingling issues.	\$2,032,266
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct Palladia officials to provide documentation to justify that	
		the \$1,615,057 in unsupported costs is associated with eligible program activities.	
		Any unsupported costs determined to be ineligible should be reimbursed from non-	
2014-NY-1008-001-A	7/25/2014	Federal funds.	\$1,615,057
		We recommend that the Director of HUD's New York Office of Public and Indian	
		Housing require Authority officials to provide supporting documents for the proper	
		use of \$1,250,417 in sale proceeds from the scattered-site properties. Any amounts	
		not supported or found to be improperly used should be repaid to the homeownership	
2015-NY-1002-002-C	12/1/2014	program from non-Federal funds.	\$1,245,317
		Reimburse \$1,183,642 in HOME and CHDO funds to the HOME Investment Trust Fund	
2014-AT-1005-001-A	5/29/2014	treasury account from non-Federal funds.	\$1,183,642
		Recover from the borrowers and reimburse \$1,080,242 to the applicable loan	
		guarantee account from non-Federal funds for ineligible disbursements that were not	
2015-AT-1001-002-A	12/5/2014	related to the approved projects and used to finance local government operations.	\$1,080,242
		Provide documentation to support the \$1,031,000 in CDBG loans or reimburse the	
2014-AT-1005-001-B	5/29/2014	CDBG program from non-Federal funds.	\$1,031,000

		Reimburse \$772,000 in HOME funds used to pay ineligible expenses to the HOME	
2014-AT-1005-002-A	5/29/2014	Investment Trust Fund treasury account from non-Federal funds.	\$772,000
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to provide documentation to support the	
		reasonableness and eligibility of the administrative program delivery costs charged to	
		the CDBG program, including \$597,048 in program delivery costs that could have been	
		allocated to the State program, and repay the CDBG program from non-Federal funds	
2014-NY-1004-001-G	5/20/2014	any amounts determined to be unreasonable or ineligible.	\$597,048
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct Palladia officials to provide source documentation to	
1		substantiate that the \$584,579 in required non-Federal cash matching funds for five of	
2014-NY-1008-001-E	7/25/2014	the six program projects reviewed were met.	\$584,579
		Support or reimburse its program \$570,834 from non-Federal funds for payments that	
2014-FW-1003-001-C	7/2/2014	lacked supporting documentation.	\$570,834
		Reimburse the Authority's programs from non-Federal funds for more than \$697,471	
2014-BO-1002-002-A	4/30/2014	in unreasonable salary expenditures.	\$512,516
		We recommend that the Director of the HUD Newark Office of Public and Indian	
		Housing instruct Authority officials to provide documentation to support that the 252	
		units for which the Authority's records did not document that an annual inspection	
		was performed during program year 2012 comply with housing quality standards. If	
1		such documentation cannot be provided, the \$3.89 million (consisting of \$3,768,868 in	
		housing assistance payments and \$122,977 of the Authority's administrative fee paid	
2014-NY-1001-001-A	1/15/2014	related to those units) should be reimbursed to the program from non-federal funds.	\$427,364
		Obtain and submit supporting documentation showing the eligibility and propriety of	
		\$367,840 in disbursements or reimburse the loan guarantee account from non-Federal	
2015-AT-1001-002-C	12/5/2014	funds.	\$367,840
		Seek recovery of the \$323,720 in CDBG funds from the bank with interest from March	
		14, 2002, to the present. Reimburse \$323,720 in CDBG funds to the CDBG program	
2014-AT-1005-002-B	5/29/2014	from non-federal funds and reimburse the interest to the U.S. Treasury.`	\$323,720
		Reimburse the grantee's program \$312,077 from non-Federal funds for the ineligible	
2014-PH-1007-001-A	7/15/2014	disbursements.	\$312,077

2014-AT-1005-002-C	5/29/2014	account from non-Federal funds.	\$100,000
		Reimburse \$100,000 in HOME funds to the HOME Investment Trust Fund Treasury	
2014-CH-1006-003-F	8/14/2014	housing assistance cited in this finding.	\$118,079
		administrative fees) from non-Federal funds for the unsupported overpayment of	
		\$118,079 (\$112,571 in housing assistance payments \$5,508 in associated	
		Public and Indian Housing require the Authority to support or reimburse its program	
		We recommend that the program center coordinator of HUD's Indianapolis Office of	
2014-CH-1006-001-C	8/14/2014	funds for the unsupported credit card expenditures cited in this finding.	\$132,974
		\$64,605 in unsupported expenditures) or reimburse its program from non-Federal	
		not used for the \$132,974 (\$68,369 in personal and inappropriate expenditures	
		Public and Indian Housing require the Authority to support that program funds were	
		We recommend that the program center coordinator of HUD's Indianapolis Office of	
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2014-FW-1806-001-E	8/19/2014	credit card purchases that did not have receipts or other support.	\$144,263
	-, ,	Support or repay from non-Federal funds \$144,263 to its Operating Fund program for	, -,
2014-FW-1002-001-B	5/27/2014	associated with its business activities until it has established appropriate controls.	\$178,893
	., ==, = •= :	Discontinue using its low-rent public housing fund as a general fund to pay costs	Ţ==5, 00 1
2014-PH-1007-001-B	7/15/2014	the grantee's program from non-Federal funds for any amount that it cannot support.	\$226,664
		Provide documentation to support its use of \$308,797 in program funds or reimburse	
2014-LA-0005-001-A	8/8/2014	HUD incurred losses of nearly \$22.4 million for these loans.	\$240,000
		were part of the ACD program for which the lenders were not billed (see appendix D).	
		Initiate the billing process, including determining lender status, for the 237 loans that	
2015-FW-1801-001-D	10/2/2014	the full \$243,422 should be repaid to HUD.	\$243,442
		program or support that the funds charged to the Federal programs were appropriate,	
		the Authority is unable to accurately determine the amount due to and due from each	
		funds and repay the amounts to the appropriate programs from non-Federal funds. If	
		individuals assigned to work at multiple properties was improperly paid with Federal	
		Require the Authority to determine how much of the \$243,442 in salaries for	

		We recommend that the Acting Director of HUD's Chicago Office of Public Housing	
		require the Authority to support or reimburse its program \$220,704 (\$70 \$197,906 in	
		housing assistance payments \$26 in utility allowances \$22,702 in associated	
		administrative fees) from non-Federal funds for the unsupported overpayment of	
		housing assistance due to unsupported calculations, missing eligibility documentation,	
2014-CH-1004-001-F	7/14/2014	and discrepancies in the housing assistance payments register.	\$91,226
	77 = 17 = 0 = 1	Require the Authority to determine whether the Authority improperly used Federal	+,
I		funds totaling \$50,000 which were used to pay unnecessary severance contract costs.	
		If Federal funds were improperly used, the Authority should repay \$50,000 to its	
		Federal program accounts from non-Federal funds. If the Authority is unable to	
		accurately determine the amount due to and due from each program or support that	
		the funds charged to the Federal program were appropriate, the full \$50,000 should	
2015-FW-1801-001-J	10/2/2014	be repaid to HUD.	\$50,000
		We recommend that the Director, Office of Public Housing, Fort Worth, TX, require the	. ,
		Authority to either support or repay to HUD for its transmission to the U.S. Treasury	
		\$43,300 in unsupported asbestos abatement expenses. Repayment must be from non-	
2015-FW-1802-001-D	10/31/2014	Federal funds.	\$43,300
		Require the Authority to determine whether the Authority improperly used Federal	
		funds totaling \$40,600 to make lease payments on the parking lot it already owned. If	
		Federal funds were improperly used, the Authority should repay \$40,600 from non-	
		Federal funds to its Federal program accounts. If the Authority is unable to accurately	
		determine the amount due to and due from each program or support that the funds	
		charged to the Federal program were appropriate, the full \$40,600 should be repaid to	
2015-FW-1801-001-F	10/2/2014	HUD.	\$40,600
		Require the Authority to support or repay its various program accounts \$109,861 from	
		nonfederal funds for unsupported payroll, other compensation, bonuses, travel,	
2014-FW-1802-001-B	3/31/2014	supplies, contractor payments and petty cash disbursements.	\$38,337
		Submit supporting documentation showing the eligibility and propriety of \$37,215	
2014-AT-1801-001-D	3/20/2014	drawn from HUD or reimburse the State CDBG program from non-Federal funds.	\$37,215

		We recommend that the Director, Office of Public Housing, Fort Worth, TX, require the	
		Authority to resolve its unpaid payroll taxes and retirement liabilities and ensure that	
		the Authority only uses non-federal or non-HUD funds to pay the unpaid interest or	
2015-FW-1802-001-B	10/31/2014	penalties.	\$36,882
		The Nashua Housing Authority and the City of Nashua to provide support that they	
		complied with 24 CFR Part 58 requirements for the Authority's 2011 Capital Fund	
		grant or require the housing agency to repay \$874,261 to HUD. Repayment must be	
2014-FW-0001-001-E	2/7/2014	from non-Federal funds.	\$33,120
		We recommend that the Director, Office of Public Housing, Fort Worth, TX, Require	
		the Authority to support or repay \$46,097 in unsupported expenditures. The funds	
		should be repaid to the Authority's public housing program. However, if the Authority	
		made any of the expenditures from its 2010 or earlier capital fund grants, or if the	
		Authority is unable to determine the source of funds used to pay expenditures, the	
2015-FW-1802-001-C	10/31/2014	Authority should repay HUD. Any repayments must be from non-Federal funds.	\$21,767
		Reimburse its program \$18,391 from non-Federal funds for the 12 units that	
2014-FW-1003-002-B	7/2/2014	materially failed to meet HUD's housing quality standards.	\$16,391
		Reimburse its program \$16,350 from non-Federal funds for the overpayment of	
2014-FW-1003-001-A	7/2/2014	housing assistance and utility reimbursement payments.	\$16,350
		Require the Authority to determine whether the Authority improperly used Federal	
		funds totaling \$11,833 which were used to cancel an existing phone system and	
		purchase a new one. If Federal funds were improperly used, the Authority should	
		repay \$11,833 to its Federal program accounts from non-Federal funds. If the	
		Authority is unable to accurately determine the amount due to and due from each	
		program or support that the funds charged to the Federal program were appropriate,	
2015-FW-1801-001-H	10/2/2014	the full \$11,833 should be repaid to HUD.	\$11,833
		Agree to allow HUD OIG to record the \$57,500 settlement in HUD's Audit Resolution	
2014-CF-1805-001-A	8/11/2014	and Corrective Actions Tracking System as an ineligible cost.	\$6,620
		Repay \$3,840 from non-Federal funds to its Operating Fund program for amounts paid	
2014-FW-1806-001-D	8/19/2014	for ineligible credit card purchases and transactions.	\$3,840
		Support or repay from non-Federal funds \$2,070 to its Capital or Operating Fund	
2014-FW-1806-001-F	8/19/2014	program as appropriate for the missing appliances.	\$2,070

		We recommend that the Director, Office of Multifamily Asset Management, require	
		that each Hub or field office review its refinanced Section 202/223(f) projects for debt	
		service savings amounts, utilizing data provided from this audit for possible additional	
		debt service savings. Where legally possible each Hub or field office should identify,	
		account for by project, and use these amounts for current and future opportunities	
2014-NY-0001-001-B	2/19/2014	benefiting tenants or to fund reductions in housing assistance payments.	\$0
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		Ensure that the Municipality maintains adequate documentation related to the	
		Vieques sports complex project in accordance with HUD requirements and that these	
2014-AT-1801-001-C	3/20/2014	demonstrate the allowability, necessity, and reasonableness of the costs incurred.	\$0
	, ,	Develop, document, and implement written procedures to ensure that fees charged to	· -
		the asset management projects and Capital Fund program and expenses from the	
2014-LA-0004-001-H	6/30/2014	central office cost center are used to support HUD's mission.	\$0
	.,,	Establish and implement procedures to reassess the management and bookkeeping	
		fees periodically to ensure that they are reasonable. HUD should retain the	
2014-LA-0004-001-C	6/30/2014	documentation justifying the calculation of the rates.	\$0
	.,,	HUD should remove the provision that allows public housing authorities to charge	
		asset management fees, which would ensure that at least \$81.6 million in operating	
2014-LA-0004-001-B	6/30/2014	funds could be put to better use in meeting HUD program objectives.	\$0
	.,,	Revise HUD's asset management fee policy to refederalize the Operating Fund	
		program's management and bookkeeping fees and the Capital Fund program's	
2014-LA-0004-001-A	6/30/2014	management fees.	\$0
	3,00,00	Update CAIVRS' selection rules to report delinquent Federal debt beyond the 3-year	7.5
		claim period or obtain an exemption from the Secretary of the Treasury to exempt	
2014-KC-0002-002-A	7/2/2014	FHA loans after 3 years.	\$0
2014-KC-0002-001-C		Develop and implement system error checks to identify potential reporting issues.	\$0
		Document the selection rules used for feeding data to CAIVRS to explain in detail the	·
2014-KC-0002-001-A	7/2/2014	flow of information from HUD's systems.	\$0
		·	·
		Based on the outcome of the State's investigation and criminal trial, make a referral to	
		HUD recommending administrative sanctions, as appropriate, up to and including	
		debarment of the Authority's former rehabilitation specialist, the Planning District	
2014-PH-1007-001-D	7/15/2014	Commission's former deputy director, and the involved contractors.	\$0
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		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct Palladia officials to reconcile its accounting records to	
		ensure that total revenues and expenditures in its general ledgers reconcile to the	
2014-NY-1008-001-F	7/25/2014	revenues and expenditures reported in its annual performance reports and LOCCS.	\$0
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		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct Palladia officials to provide records detailing the funding	
2014-NY-1008-001-D	7/25/2014	sources of the non-Federal cash match for the six grant activities reviewed.	\$0
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct Palladia officials to follow its policies and procedures for	
		record-keeping to maintain records that adequately identify the source and	
2014-NY-1008-001-C	7/25/2014	application of funds provided for financially assisted activities.	\$0
		We recommend that the Director of HUD's New York Office of Community Planning	
		and Development instruct Palladia officials to strengthen oversight controls over	
		disbursements to ensure that adequate supporting documentation is maintained and	
2014-NY-1008-001-B	7/25/2014	complies with applicable regulations.	\$0
		Implement controls to prevent or mitigate instances of borrowers violating HECM	
		program residency requirements by concurrently participating in the Voucher	
		program, including policies and procedures to at least annually coordinate with HUD's	
		Office of Public Housing to match borrower data in the Single Family Data Warehouse	
2014-PH-0001-001-B	9/30/2014	to member data in the Public Housing Information Center.	\$0
		Increase monitoring of Municipal Affairs' performance in the administration of its	
		Section 108 loan program. Consider imposing sanctions if Municipal Affairs does not	
2015-AT-1001-002-I	12/5/2014	demonstrate program progress.	\$0
		Conduct monitoring reviews of all Section 108 projects and ensure that borrowers	
2015-AT-1001-002-H	12/5/2014	comply with all loan agreement provisions and HUD regulations.	\$0
		Ensure that all Section 108 loan proceeds deposited at commercial banks are properly	
2015-AT-1001-002-G	12/5/2014	collateralized with Government obligations.	\$0
		Ensure that borrowers develop and implement a financial management system in	
		accordance with HUD requirements to ensure that program funds can be traced to a	
		level that ensures that such funds have not been used in violation of the restrictions	
2015-AT-1001-002-F	12/5/2014	and prohibitions of applicable statutes.	\$0

		Ensure that the borrowers provide HUD the additional security requirements	
2015-AT-1001-002-E	12/5/2014	according to the loan agreement.	\$0
		Ensure that the borrowers either transfer the unexpended Section 108 loan proceeds	
2015-AT-1001-002-D	12/5/2014	to the repayment account or submit a request for extension to HUD.	\$0
		Ensure that borrowers did not use Section 108 funds to finance local government	
2015-AT-1001-002-B	12/5/2014	operations and verify the return of any ineligible disbursement.	\$0
		Conduct monitoring of the Section 108 activities with signs of slow progress to ensure	
2015-AT-1001-001-D	12/5/2014	that program objectives are met and provide the intended benefits.	\$0

List of Open Recommendations to Present

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to provide documentation showing that the \$127.2 million budgeted for	
		inspection-related construction management and environmental review services is	
		fair and reasonable in accordance with a cost or price analysis as required by	
2015-NY-1011-003-A	9/17/2015	regulations at 24 CFR 85.36.	\$127,200,000
		Develop and implement written policies and procedures with an emphasis on	
		increased controls toward the monitoring, tracking, underwriting, and evaluating of	
		the Section 184 program. Implementing these controls would reduce the current high	
		level of risk in the program and result in potentially \$76,967,618 in funds to be put to	
2015-LA-0002-001-A	7/6/2015	better use (see appendix A).	\$76,967,618
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to provide adequate documentation for the reasonableness of the cost	
		figure used to disburse \$55,672,982 for reconstruction costs. Any amount not	
2015-NY-1011-001-F	9/17/2015	adequately supported should be repaid to the State's line of credit.	\$55,672,982
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to provide adequate documentation for the reasonableness of the cost	
		figure used for reconstruction costs, thus ensuring that the undisbursed award balance	
2015-NY-1011-001-G	9/17/2015	of \$31,831,316 is put to its intended use.	\$31,831,316
		Submit a plan for how it will proceed with respect to the multipurpose facility project,	
		including a schedule that HUD can track to ensure its completion. HUD must	
		reevaluate the feasibility of the activity and determine the eligibility of the \$8,111,304	
		already invested. (Footnote 4: Total investments of \$8,232,388 were adjusted to	
		account for \$109,084 questioned in recommendation 2A and \$12,000 in	
		recommendation 2B.) If HUD determines that the activity has been canceled or is not	
		feasible, the Municipality must commit any unused loan proceeds for future loan	
2016-AT-1002-001-A	12/17/2015	repayments.	\$8,111,304
		Provide support showing that it took proper remedial action regarding five NSP3	
		grantees that missed the expenditure deadline, thereby putting \$3,379,269 to better	
2015-AT-0001-001-B	3/31/2015	use.	\$3,345,967
		Repay HUD \$3,119,448 from non-Federal funds for program funds spent on ineligible	
2015-LA-1004-001-A	5/29/2015	participants.	\$3,119,448

		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to reimburse the line of credit for \$2,229,234, which was disbursed to	
2015-NY-1011-001-A	9/17/2015	program recipients for ineligible costs.	\$2,229,234
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs instruct	
		State officials to review the five properties with indications that they may be second	
		homes and if they are, reimburse the State's line of credit from non-Federal funds for	
2015-NY-1010-002-C	9/17/2015	the \$1,664,658 disbursed for these purchases.	\$1,664,658
		Submit a plan for how it will proceed with respect to the municipal cemetery project,	
		including a schedule that HUD can track to ensure its completion. HUD must	
		reevaluate the feasibility of the activity and determine the eligibility of the \$1,454,801	
		already invested. If HUD determines that the activity has been canceled or is not	
		feasible, the Municipality must commit any unused loan proceeds for future loan	
2016-AT-1002-001-B	12/17/2015	repayments.	\$1,454,801
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs instruct	
		State officials to provide documentation that the selection of the appraiser in Staten	
		Island was consistent with the other State agency's contract provisions. If such	
		documentation cannot be provided, the \$1,093,290 budgeted should be deobligated,	
2015-NY-1010-003-E	9/17/2015	thus ensuring that the funds will be put to better use.	\$1,093,290
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to de-obligate the undisbursed amount of \$911,662 to ensure that the	
2015-NY-1011-001-B	9/17/2015	funds will be put to their intended use.	\$911,662
		We recommend that HUD's Deputy Assistant Secretary for Single Family Housing	
		require the lenders to support that the repairs to the properties associated with the	
		32 loans without evidence of permits complied with local code or reimburse HUD	
2015-CH-0001-001-A	7/31/2015	\$792,837 for the escrow repair funds.	\$792,837
		Support or reimburse its program from non-Federal funds for the \$686,701 in program	
		funds drawn down for which it did not provide sufficient documentation to support	
2016-CH-1001-001-A	11/24/2015	that the funds were used for eligible project expenses.	\$686,701
		Submit all supporting documentation showing the eligibility and propriety of \$538,485	-
		drawn from its treasury account or reimburse the HOPWA program line of credit from	
2015-AT-1004-001-A	7/2/2015	non-Federal funds.	\$538,485
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Determine whether the documentation the State pro	
\$467,659 disbursed for wages and salaries charged to	the program by contractors'
employees and if not, direct the State to repay HUD f	
2015-PH-1003-001-D 6/4/2015 amount that it cannot support.	\$467,659
1Support or reimburse its program \$411,382 from no	
\$2,418 in housing assistance payments \$13,665 in as	
the missing eligibility documentation) for the missing	
2015-CH-1008-001-I 9/25/2015 unsupported housing assistance payments.	\$411,382
Reimburse FHA borrowers \$376,102 for the unallowa	· · · ·
2015-LA-1005-001-E 7/9/2015 fees and \$7,110 for fees that were not customary or r	
We recommend that the HUD Director of Community	.
instruct City officials to reimburse the City's HOME p	-
from non-Federal funds for HOME assistance spent of	n housing units acquired by five
2015-NY-1005-002-C 4/30/2015 ineligible home buyers.	\$344,776
We recommend that HUD's Deputy Assistant Secreta	ry for Single Family Housing
require the lenders to support that the repairs to the	properties associated with the
six loans were not structural repairs or indemnify HU	D for the four active loans with a
total estimated loss of \$222,073 and reimburse HUD	for the actual loss of \$83,322
incurred on the sale of two properties associated with	n FHA case numbers 052-4308836
2015-CH-0001-001-B 7/31/2015 and 034-8239100.	\$305,395
We recommend that the Director of HUD's Cleveland	Office of Public and Indian
Housing require the Authority to support or reimburs	e its program \$414,781
(\$375,336 \$7,273 in housing assistance payments \$	32,172 in associated
administrative fees) from non-Federal funds for the u	nsupported payments of housing
2015-CH-1004-001-C 9/9/2015 assistance cited in this finding.	\$259,503
Submit all supporting documentation showing the eli	
in HOPWA expenditures or reimburse the HOPWA pro	
2015-AT-1004-001-B 7/2/2015 Federal funds.	\$143,320
We recommend that HUD's Deputy Assistant Secreta	
State officials to provide adequate documentation to	
funds that was disbursed to three recipients. If any a	• • • • • • • • • • • • • • • • • • • •
2015-NY-1011-001-D 9/17/2015 supported, it should be repaid to the State's line of cr	

	T		
		Reimburse its program from non-Federal funds for the overpayment of any housing	
		assistance for approval of rent increases on program units contrary to its	
2015-AT-1011-001-C	9/30/2015	requirements.	\$89,495
		Reimburse HUD from non-Federal funds for the \$87,651 in program funds used for	
2016-CH-1001-001-B	11/24/2015	improper operating expenses.	\$87,651
		Provide supporting documentation for \$136,346 in program funds used for	
		participants for whom eligibility could not be determined or repay HUD from non-	
2015-LA-1004-001-B	5/29/2015	Federal funds (see appendix D).	\$85,756
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs instruct	
		State officials to provide documentation to support that the \$85,309 disbursed for	
		four applicants was calculated correctly. If adequate support cannot be provided, the	
2015-NY-1010-002-E	9/17/2015	amount should be repaid to the State's line of credit from non-Federal funds.	\$85,309
		We recommend that HUD's Deputy Assistant Secretary for Single Family Housing	
		require the lenders to support that the borrower for FHA case number 451-1165810	
		was not reimbursed for the cost of labor or indemnify the loan with an estimated loss	
		amount of \$83,715, based on the loss severity rate of 50 percent of the unpaid	
2015-CH-0001-001-C	7/31/2015	principal balance of \$167,429 as of January 29, 2015.	\$83,715
		Reimburse its program \$79,884 from non-Federal funds (\$45,093 in housing assistance	
		overpayments \$15,816 due to inappropriate voucher size \$605 in overpaid utility	
		allowances \$18,370 in associated administrative fees) for the inappropriate	
2015-CH-1008-001-A	9/25/2015	payments cited in this finding.	\$79,884
		Reimburse FHA borrowers \$25,700 for fees that were not customary or reasonable	
2015-LA-1009-001-E	9/30/2015	and \$46,510 in discount fees that did not represent their intended purpose.	\$72,210
		We recommend that the Director, Office of Public Housing, Little Rock, require the	
		Authority to support or repay its public housing program \$611,338 from non-Federal	
		funds for improperly procured contracts. However, if the Authority made any of the	
		expenditures from its capital fund grants that have not been validated within 2 years,	
		or if the Authority is unable to determine the source of funds used to pay	
2015-FW-1807-001-B	8/14/2015	expenditures, the Authority should repay HUD.	\$63,531

		Support that the repair conditions and comments indicated in the direct endorsement	
		underwriter form, form HUD-54114, were satisfied for FHA case number 501-8198149.	
		If the repair conditions and comments were not properly addressed, the lenders	
		should indemnify the loan with an estimated loss amount of \$39,367, based on the	
		loss severity rate of 50 percent of the unpaid principal balance of \$78,733 as of	
2015-CH-0001-001-D	7/31/2015	January 29, 2015.	\$39,367
		Reimburse HUD \$24,088 from non-Federal funds for the Family Self-Sufficiency grant	
2015-CH-1008-002-A	9/25/2015	funds inappropriately received.	\$17,088
		Reimburse \$13,726 to FHA borrowers for the fees that were not customary or	
2015-LA-1010-001-E	9/30/2015	reasonable.	\$13,726
		Reimburse or apply \$10,552 in credit to borrowers' future premiums for the 54 active	
		loans with overpaid premiums and refund \$2,024 to the borrowers of the 7	
2015-CH-0001-002-A	7/31/2015	terminated loans.	\$12,576
		Reimburse \$12,447 to the HOPWA program line of credit from non-Federal funds for	
2015-AT-1004-001-C	7/2/2015	ineligible disbursements that were not related to the program.	\$12,447
		We recommend that the Director, Office of Public Housing, Fort Worth, TX, require the	
2015-FW-1805-001-C	4/10/2015	Authority to support or repay \$11,875 in unsupported salary costs.	\$11,775
		We recommend that the Director, Office of Public Housing, Fort Worth, TX, require the	
		Authority to repay its low-rent public housing program \$11,256 from non-Federal	
2015-FW-1805-001-D	4/10/2015	funds for ineligible contract labor payments.	\$11,256
		We recommend that the Director, Office of Public Housing, Fort Worth, TX, require the	
		Authority to repay its low-rent public housing program \$9,072 for ineligible USDA	
2015-FW-1805-001-E	4/10/2015	program administrative expenses.	\$9,072
		We recommend that the Director, Office of Public Housing, Little Rock, require the	
		Authority to repay its public housing program \$11,651 from non-Federal funds for	
		ineligible expenditures. However, if the Authority made any of the expenditures from	
		its capital fund grants that have not been validated within 2 years, or if the Authority	
		is unable to determine the source of funds used to pay expenditures, the Authority	
2015-FW-1807-001-E	8/14/2015	should repay HUD.	\$4,030
		Work with 134 grantees (29 NSP1 and 105 NSP3) that reported missing expenditure	
		deadlines in DRGR to ensure that expenditure information submitted is accurate and	
2015-AT-0001-001-C	3/31/2015	up to date.	\$0

If an independent program office is not established, the Deputy Secretary should	
ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and	
Community Planning and Development develop and implement reporting	
requirements, which ensure that written records are maintained and the appropriate	
6/16/2015 headquarters personnel are notified of environmental concerns.	\$0
If an independent program office is not established, the Deputy Secretary should	
ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and	
Community Planning and Development develop training programs that meet the	
6/16/2015 needs of all program areas, including 24 CFR Parts 50 and 58.	\$0
If an independent program office is not established, the Deputy Secretary should	
ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and	
Community Planning and Development develop and implement a monitoring program	
that all program area field offices can use to monitor grantees and responsible entities	
6/16/2015 under 24 CFR Part 58.	\$0
If an independent program office is not established, the Deputy Secretary should	
ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and	
Community Planning and Development adopt a quality control monitoring program	
that includes a review of all program area field offices as required by Executive Order	
6/16/2015 11514.	\$0
We recommend that the Deputy Secretary of the U.S. Department of Housing and	
Urban Development ensure that HUD follows and complies with 24 CFR Part 50,	
Protection and Enhancement of Environmental Quality, and provides adequate	
oversight to ensure compliance with 24 CFR Part 58, Environmental Review	
6/16/2015 Procedures for Entities Assuming HUD Environmental Responsibilities.	\$0
Reconcile the total list of guaranteed Section 184 loans to the complete loan file	
7/6/2015 storage list and identify and locate any missing loan files.	\$0
Develop and implement written policies and procedures for situations in which the	
borrower for a Section 184 loan is an Indian housing authority, a tribally designated	
7/6/2015 housing entity, or an Indian tribe.	\$0
Ensure that only underwriters that are approved by OLG are underwriting Section 184	
7/6/2015 loans.	\$0
Develop and implement policies and procedures to ensure that OLG uses enforcement	· .
actions available under 12 U.S.C. 1715z-3a(g) for lenders that do not underwrite loans	
7/6/2015 according to the Section 184 processing guidelines.	\$0
	ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and Community Planning and Development develop and implement reporting requirements, which ensure that written records are maintained and the appropriate headquarters personnel are notified of environmental concerns. If an independent program office is not established, the Deputy Secretary should ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and Community Planning and Development develop training programs that meet the needs of all program areas, including 24 CFR Parts 50 and 58. If an independent program office is not established, the Deputy Secretary should ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and Community Planning and Development develop and implement a monitoring program that all program area field offices can use to monitor grantees and responsible entities under 24 CFR Part 58. If an independent program office is not established, the Deputy Secretary should ensure that the Assistant Secretaries for Housing, Public and Indian Housing, and Community Planning and Development adopt a quality control monitoring program that includes a review of all program area field offices as required by Executive Order 11514. We recommend that the Deputy Secretary of the U.S. Department of Housing and Urban Development ensure that HUD follows and complies with 24 CFR Part 50, Protection and Enhancement of Environmental Quality, and provides adequate oversight to ensure compliance with 24 CFR Part 58, Environmental Review 6/16/2015 Procedures for Entities Assuming HUD Environmental Responsibilities. Reconcile the total list of guaranteed Section 184 loans to the complete loan file storage list and identify and locate any missing loan files. Develop and implement written policies and procedures for situations in which the borrower for a Section 184 loan is an Indian housing authority, a tribally designated housing entity, or an Indian tribe. Ensure that only underwriter

	Develop and implement policies and procedures to deny payments to direct guarantee	
2015-LA-0002-001-C	7/6/2015 lenders for claims on loans that have material underwriting deficiencies.	\$0
2013-LA-0002-001-C	Develop and implement policies and procedures for a standardized monthly	70
	delinquency report format that lenders must follow when submitting information to	
2015-LA-0002-001-B	7/6/2015 OLG.	\$0
2013 LA 0002 001 B	Determine the number of 203(k) loans impacted by the incorrect loan-to-value ratio	70
	for mortgage insurance premium calculations and when applicable, reimburse	
	borrowers or apply the overpaid premiums as credits toward borrowers' future	
2015-CH-0001-002-C	7/31/2015 premium payments.	\$0
2013-C11-0001-002-C	Issue guidance to help participating jurisdictions accurately report the amount of	70
2015-KC-0002-001-A	8/11/2015 match contributed and consumed.	\$0
2015-RC-0002-001-A	0/11/2013 Indean contributed and consumed.	70
	Require the 10 jurisdictions that overstated their excess match balances to remove the	
2015-KC-0002-001-C	8/11/2015 overstated amounts from their reported HOME match carry-forward balances.	\$0
2013 KC 0002 001 C	6/11/2013 Overstated amounts from their reported from Emater carry forward barances.	70
	We recommend that the Director, Office of Public Housing, Little Rock, require the	
	Authority to	
	support or repay its programs, as appropriate, \$23,621 from non-Federal funds for	
	unsupported leave balance payments to the former executive director. However, if	
	the Authority made any of the expenditures from its capital fund grants that have not	
	been validated within 2 years, or if the Authority is unable to determine the source of	
2015-FW-1807-001-F	8/14/2015 funds used to pay expenditures, the Authority should repay HUD.	\$0
2013 1 10 100 7 001 1	Implement controls to prevent or reduce instances of borrowers violating HECM	70
	program residency requirements by concurrently participating in multifamily	
	programs, including policies and procedures to at least annually coordinate with	
	HUD's Office of Multifamily Housing Programs to match borrower data in the Single	
	Family Data Warehouse to member data in the Tenant Rental Assistance Certification	
2015-PH-0004-001-C	8/21/2015 System.	\$0
	Comply with its Management Agent Handbook requirements that stipulate HUD must	70
	perform management reviews of the management agent's central office activities as	
	well as regular onsite reviews of functions carried out at the projects. These central	
2015-AT-0002-001-A	8/21/2015 office reviews should be performed at least once every 18 months.	\$0
T013 A1 0002-001-A	o, 22, 2020 Sind Terretto Should be performed at least once every 10 months	70

	Determine legal sufficiency and if legally sufficient, pursue remedies under the	
	Program Fraud Civil Remedies Act against the hospital's former chief financial officer	
	for incorrectly certifying to the accuracy of the financial information submitted to	
2015-AT-1009-001-G	9/3/2015 obtain the Section 242 program mortgage increase.	\$0
	We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
	State officials to strengthen controls over determining the eligibility of award	
	recipients and substantiate award calculations to ensure that costs charged to the	
2015-NY-1011-001-C	9/17/2015 CDBG-DR program are eligible.	\$0
	We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
	State officials to strengthen controls over the maintenance of documentation to	
2015-NY-1011-001-E	9/17/2015 provide greater assurance that disbursed funds are adequately supported.	\$0
	We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
	State officials to document the amount paid for the flawed studies used to support	
	the \$160-per-square-foot cost figure and take action to recoup the amount paid, thus	
2015-NY-1011-001-H	9/17/2015 ensuring that this amount will be available for other eligible costs.	\$0
	We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct the	-
	State to properly document the low- and moderate-income status of the two	
2015-NY-1011-002-C	9/17/2015 homeowners whose status was improperly reported.	\$0
	We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct the	
	State to strengthen controls to ensure that all required contracts and amounts are	
2015-NY-1011-002-G	9/17/2015 accurately reported on its Web site.	\$0
	Conduct ongoing monitoring of change reports to ensure that unauthorized changes	
	are not made to Ginnie Mae's data, and establish a policy regarding ongoing	
	monitoring of change activity that requires performing periodic reviews of change	
2016-FO-0001-005-B	11/13/2015 reports.	\$0
	Establish a process to track the amount HUD owes to PHAs to cover prepayment	
	shortages and provide the information to OCFO so that it can be properly recognized	
2016-FO-0003-002-D	11/18/2015 as accounts payable.	\$0
	Develop procedures to provide oversight of OCPO procurement activities to ensure	
	that those with financial accounting and reporting impact are properly captured and	
2016-FO-0003-006-C	11/18/2015 reflected in HUD's financial statements.	\$0

	12,17,2013	perioritation in the daminion of the decident 200 four problem.	ΨŪ
2016-AT-1002-002-H	12/17/2015	performance in the administration of its Section 108 loan program.	\$0
		Provide training, technical assistance, and increase monitoring of the Municipality's	Ţ
2016-AT-1002-002-F	12/17/2015	applicable statutes.	\$0
		that such funds have not been used in violation of the restrictions and prohibitions of	
		requirements to ensure that program funds can be traced to a level, which ensures	
		Develop and implement a financial management system in accordance with HUD	
2016-AT-1002-002-E	12/17/2015	Provide HUD the additional security requirements according to the loan agreement.	\$0
2016-AT-1002-002-C	12/17/2015	58.77(d)(1)(v) for noncompliance.	\$0
		environmental requirements, HUD must initiate appropriate sanctions under 24 CFR	
		requirements. If the Municipality does not provide evidence that it complied with all	
		Provide supporting documentation showing that it complied with all environmental	
2016-DP-0801-001-F	11/30/2015	Not released to public.	\$0
2016-DP-0801-001-D		Not released to public.	\$0
2016-DP-0801-001-C		Not released to public.	\$0
2016-DP-0801-001-B		Not released to public.	\$0
2016-DP-0801-001-A	11/30/2015	Not released to public.	\$0
2016-FO-0003-006-E	11/18/2015	with Treasury cash management requirements of any found.	\$0
		disbursement needs and determine financial statement impact on and compliance	
		authorize or are aware of grantees holding funds in advance of their immediate	
		Contact all other HUD program offices to determine whether any other programs	

77 \$318,833,562



List of Open Recommendations to Present

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Perform a detailed review of the procurement procedures for each of the State	
		grantees that received funds under the Disaster Relief Act. If the State did not	
		demonstrate that its procedures incorporated the specific procurement standards	
		included in 24 CFR 85.36(b) through (i) or that its procedures were equivalent to each	
		individual procurement provision of 24 CFR 85.36(b) through (i), HUD should (1)	
		require the grantee to update its procedures and provide an updated certification and	
		(2) review the updated grantee certification to confirm that the State meets	
		requirements and has a proficient procurement process in place, thereby putting up to	
		\$4,872,056,594 to better use. In cases in which HUD has not yet awarded all of the	
		allocated funds to the State, HUD should complete these steps before it executes any	
2016-PH-0005-001-A	9/29/2016	additional grant agreements with the State.	\$4,872,056,594
		Issue a change to regulations at 24 CFR Part 203, which would avoid unnecessary costs	
		to the FHA insurance fund, allowing an estimated \$2.23 billion to be put to better use.	
		These changes include (1) a maximum period for filing insurance claims and (2)	
2017-KC-0001-001-A	10/14/2016	disallowance of expenses incurred beyond established timeframes.	\$2,238,721,464
		We recommend that the Acting Deputy Assistant Secretary for Grant Programs require	
		the State to develop and implement policies and procedures to document and perform	
		detailed review and testing to establish eligibility, existence, disaster event	
		qualifications, reasonableness of cost estimates, prioritization, and fund allocation,	
2016-FW-1010-001-A	9/30/2016	both retroactively and prospectively, which would put \$81,982,712 to better use.	\$81,982,712
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
		instruct City officials to reimburse the Program from non-Federal funds \$18,274,054	
2017-NY-1004-001-A	12/21/2016	in exempt State sales tax on repairs and maintenance services.	\$18,274,054
		We recommend that the Acting Deputy Assistant Secretary for Grant Programs require	
2016-FW-1010-001-B	9/30/2016	the State to support or properly obligate \$11,717,288 in unsupported obligations.	\$11,717,288
2010-1 44-1010-001-D	3/30/2010	The State to Support of property obligate 711,717,200 in ansupported obligations.	711,717,200

		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to reimburse the City's CDBG local bank	
		account for the \$11,532,769 in uncollected program income generated from the	
		disposition of real property previously assisted with CDBG funds, thus ensuring that	
2016-NY-1007-001-A	3/30/2016	these funds can be used for eligible activities.	\$11,532,769
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to provide documentation in the loan file that HUD	
		approved the withdrawal of funds after the required deadline, and provide an	
		explanation and obtain approval for the untimely disbursement of the \$6,724,820	
		after it had been drawn down. Any costs determined to be inadequately supported	
2016-NY-1003-001-E	2/5/2016	should be reimbursed from non-Federal funds.	\$6,724,820
		Direct the New Orleans, LA, field office to enforce its monitoring findings and require	
		the grantee to provide documentation to support costs totaling \$4,959,911 or the	
		grantee must reimburse its program from non-Federal funds for any costs that it	
2016-PH-0001-001-A	6/30/2016	cannot support.	\$4,959,911
		We recommend that the Director of the Public Housing Financial Management	
		Division determine whether any of the overpayment of \$3,630,286 was ineligible and	
2016-NY-0001-001-A	9/12/2016	take appropriate actions to recoup the ineligible payments.	\$3,597,286
		Direct the Washington, DC, field office to require the grantee to provide	
		documentation to support the \$1,766,778 in unsupported payments identified or the	
		grantee must reimburse its program from non-Federal funds for any costs that it	
2016-PH-0001-001-E	6/30/2016	cannot support.	\$1,766,778
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation to support the	
		\$1,652,223 in CDBG funds used for developing the 22 affordable townhouses. Any	
		amount determined to be ineligible should be reimbursed to the City's CDBG program	
2016-NY-1007-001-F	3/30/2016	line of credit from non-Federal funds.	\$1,652,223
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to reimburse the \$1,500,000 in CDBG funds spent	
		for the delinquent float loan that defaulted in 1998 through one of the options	
		identified in HUD regulations so that it can be closed out as bad debt, thereby making	
2016-NY-1003-001-G	2/5/2016	the funds available for use on other eligible activities.	\$1,500,000
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		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to record the mortgages on the five CDBG-	
		assisted properties that were demolished and acquired with CDBG assistance of	
		\$1,475,674, thus ensuring that these properties are administered in compliance with	
2016-NY-1007-001-I	3/30/2016	program requirements.	\$1,475,674
		We recommend that the Director of the Public Housing Financial Management	
		Division validate the \$1,191,767 in underpayments and determine if any corrections	
2016-NY-0001-001-B	9/12/2016	should be made.	\$1,191,767
		Record the deobligations provided by OCPO totaling as much as \$86.4 million for the	
		contracts identified during our review. Additionally, Ginnie Mae should deobligate	
		the \$587,505 in three administrative obligations marked for deobligation during the	
2017-FO-0003-008-Q	11/15/2016	departmentwide open obligations review.	\$1,183,979
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to provide documentation to support that the	
		\$1,166,000 public facilities and improvements procurement contract price was fair	
		and reasonable and that the sole-source method used was justified. Any costs	
		determined not to be fair and reasonable should be reimbursed from non-Federal	
2016-NY-1003-001-J	2/5/2016	funds.	\$1,166,000
		Enforce the Miami, FL, field office's monitoring findings and require the grantee to	
		provide documentation to support costs totaling \$1,161,616 or the grantee must	
2016-PH-0001-001-B	6/30/2016	reimburse its program from non-Federal funds for any costs that it cannot support.	\$1,161,616
		Provide support that \$944,687 (Footnote 2: Emergency funds of more than \$1.1	
		million drawn between July 1, 2011, and December 31, 2015, were adjusted to	
		consider \$158,800 questioned in recommendation 1C and \$38,164 questioned in	
		recommendation 1D.) in Emergency funds drawn from HUD is reconciled with the	
		accounting records and that such funds have not been used in violation of the	
		restrictions and prohibitions of applicable statutes or reimburse the Emergency	
2016-AT-1012-001-B	8/29/2016	programs from non-Federal funds.	\$944,687
		Require the Authority to provide support to HUD showing that it received the best	
		value in all instances when it incorrectly awarded a contract based on a faxed bid. For	
		any portion the \$918,766 the Authority cannot support, HUD should require the	
2016-DE-1005-001-B	9/28/2016	Authority to repay its HOME and NSP programs from non-Federal funds.	\$918,766

		Require the members to provide support or reimburse HUD's FHA insurance fund	
2016-AT-1009-001-B	8/2/2016	\$865,142 for unsupported project disbursements.	\$865,142
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
		coordinate with the Office of Healthy Homes and Lead Hazard Control to provide	
		technical assistance and instruct City officials to provide supporting documentation	
		that lead-based paint testing was performed, identified hazards were removed, and	
		clearance was achieved for the 41 properties for which homeowners received	
		\$833,199 in CDBG-DR assistance. If supporting documentation is not provided, City	
2017-NY-1001-002-C	11/2/2016	officials should repay the \$833,199 from non-Federal funds.	\$833,199
I		Reimburse its program \$707,091 from non-Federal funds (\$645,509 in housing	
		assistance payments and \$61,582 in associated administrative fees) for the	
2016-CH-1004-001-A	7/28/2016	inappropriate payments cited in this finding.	\$707,091
		Provide support for the proper allocation of the \$650,990 in information technology	
		costs charged to the Capital Fund program. Any amounts that cannot be supported	
2016-BO-1002-001-F	6/27/2016	should be repaid from non-Federal funds.	\$650,990
		Acknowledge that the attached settlement agreement for \$510,000 represents an	
2016-CF-1813-001-A	9/30/2016	amount due HUD.	\$510,000
		Reimburse its public housing projects \$507,800 from non-Federal funds related to the	
2016-PH-1005-001-A	8/17/2016	ineligible duplication of the information technology fee.	\$507,800
		Provide support showing that the contracts for which \$488,150 (\$216,142 and	
		\$272,008 for legal services and public relations services, respectively) was paid were	
		procured at the most competitive and best price and the costs paid were necessary	
		and reasonable. Any unnecessary or unreasonable costs should be repaid from non-	
2016-BO-1002-001-K	6/27/2016	Federal funds to the program(s) that paid the costs.	\$488,150
		Support or reimburse its program \$496,585 from non-Federal funds (\$467,426 \$444	· · · · · · · · · · · · · · · · · · ·
		in housing assistance payments \$28,715 in administrative fees) for the missing	
2016-CH-1006-001-A	8/23/2016	eligibility documentation and unsupported housing assistance payments.	\$467,870
	1	Require Majestic Management to provide support that \$462,281 paid for	
2017-KC-1001-002-B	12/16/2016	procurements was reasonable or reimburse the appropriate projects for the balance.	\$462,281
		Provide documentation to show that fees it charged for maintenance services totaling	
		\$4,927,176 were reasonable or reimburse its public housing projects from non-Federal	
2016-PH-1005-001-B	8/17/2016	funds for any amount that it cannot support.	\$448,225

		Provide documentation to support that it paid itself \$447,345 for eligible purposes or	
2017-KC-1001-001-B	12/16/2016	reimburse the appropriate projects for the balance.	\$447,345
		We recommend that the Director of HUD's Office of Public Housing instruct Authority	
		officials to provide documentation showing that the \$474,571 in identified	
		procurements was reasonable or repay any amounts not supported from non-Federal	
2017-NY-1002-001-A	11/22/2016	funds.	\$419,271
		Reimburse its program \$497,668 (\$453,995 in housing assistance payments \$43,673	
		in associated administrative fees) from non-Federal funds for the inappropriate	
2016-CH-1007-001-A	9/28/2016	payments cited in this finding.	\$408,596
		Support the cost reasonableness of the nine contracts or reimburse \$408,958 to the	
		appropriate Operating Fund, Capital Fund, and Housing Choice Voucher programs	
2016-AT-1008-001-A	7/19/2016	from non-Federal funds.	\$352,228
		Require the Authority to provide support to HUD showing the necessity of drug testing	
		every house and that the Authority received the best value for amounts spent on	
		testing and remediation. For any portion the \$315,166 the Authority cannot support,	
		HUD should require the Authority to repay its HOME and NSP programs from non-	
2016-DE-1005-001-A	9/28/2016	Federal funds.	\$315,166
		Provide documentation to show that \$2,377,970 disbursed for other direct costs was	
		supported and was for prices that were fair and reasonable or repay HUD from non-	
		Federal funds any amount that it cannot support (excluding any amount repaid as a	
2016-PH-1009-001-C	9/30/2016	result of recommendation 1B).	\$303,004
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs instruct	
		State officials to immediately recapture more than \$300,000 in CDBG-DR funds	
		disbursed to 35 businesses that was subject to full or partial recapture, thus ensuring	
2016-NY-1006-002-C	3/29/2016	that these funds will be put to their intended use.	\$300,000
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to provide documentation to justify the \$291,236	
		in unsupported costs related to disbursements made to the City's public services	
		subrecipient. Any costs determined to be inadequately supported should be	
2016-NY-1003-001-C	2/5/2016	reimbursed from non-Federal funds.	\$291,236
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to reimburse the line of credit for \$272,459 in CDBG-DR funds disbursed	
2016-NY-1006-001-A	3/29/2016	to four businesses for ineligible costs from non-Federal funds.	\$272,459

		Provide documentation to support \$516,560 disbursed for wages and salaries charged	
		to its programs by its contractor's employees or repay HUD from non-Federal funds	
2016-PH-1009-001-D	9/30/2016	any amount that it cannot support.	\$244,612
		Provide documentation to support program accomplishment data related to	
		disbursements totaling \$292,611 or repay HUD from non-Federal funds for any	
2016-PH-1006-001-A	8/31/2016	amount that it cannot support.	\$240,000
		Require Majestic Management to reimburse the appropriate projects their portion of	
2017-KC-1001-002-A	12/16/2016	\$231,091 for work not completed or overbilled.	\$231,091
		We recommend that the Director of the HUD's Buffalo Office of Community Planning	
		and Development instruct City officials to provide documentation to adequately	
		support that \$70,538 disbursed and \$150,000 obligated were for eligible costs. Any	
2016-NY-1002-001-A	1/7/2016	costs determined to be ineligible should be reimbursed from non-Federal funds.	\$220,538
		Reimburse \$189,227 to the Emergency programs from non-Federal funds for ineligible	
2016-AT-1012-001-C	8/29/2016	charges made to the programs.	\$189,227
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
		coordinate with the Office of Healthy Homes and Lead Hazard Control to provide	
		technical assistance and instruct City officials to document the negative lead test	
		results in CMS for one home and the removal of identified lead hazards and lead	
		clearance reports for four homes, thus ensuring that \$182,660 in CDBG-DR assistance	
		was disbursed for lead-safe homes. If the negative test results are not documented,	
2017-NY-1001-002-B	11/2/2016	City officials should repay the \$182,660 from non-Federal funds.	\$182,660
		Require the members to reimburse HUD's FHA insurance fund \$181,020 for the	
2016-AT-1009-001-A	8/2/2016	ineligible distributions to the members.	\$181,020
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to reimburse from non-Federal funds \$153,279	
		spent on ineligible costs for duplicate and preaward costs of an economic	
		development loan (\$99,616), non-Federal City salary costs (\$46,324), and duplicate	
2016-NY-1003-001-A	2/5/2016	subrecipient costs (\$7,339).	\$153,279
		N/a management of the tribund's Demote Assistant Company for Company Company	
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs direct	
		State officials to provide adequate documentation to justify \$152,703 in CDBG-DR	
		funds disbursed to six businesses. If any amount cannot be adequately supported, it	.
2016-NY-1006-001-B	3/29/2016	should be reimbursed from non-Federal funds to the State's line of credit.	\$152,703

		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation to support whether	
		\$148,000 in CDBG program income was generated from the disposition of real	
		properties acquired with CDBG funds so that HUD can determine eligibility. Any	
		recognized program income should be reimbursed to the City's local bank account and	
2016-NY-1007-001-E	3/30/2016	recorded in IDIS, thus ensuring that these funds can be put to better use.	\$148,000
		Provide support for the \$132,759 in assistance that was based on the missing tenant	
2016-SE-1004-001-A	9/12/2016	files and reimburse HUD for the amount that remains unsupported.	\$132,759
		We recommend that the Director of the Public Housing Financial Management	
		Division recapture the overpayment of \$116,218 disbursed for the units, which	
2016-NY-0001-001-F	9/12/2016	exceeded the PHAs' Faircloth limit.	\$116,218
		We recommend that the Director of the HUD's Buffalo Office of Community Planning	
		and Development instruct City officials to spend program income of \$113,733 on	
		eligible CDBG activities before drawing down additional CDBG entitlement funds, thus	
2016-NY-1002-001-D	1/7/2016	ensuring that these funds are put to better use.	\$113,733
		Reimburse the program \$108,390 from non-Federal funds for housing assistance	
		payments (\$100,214) and administrative fees received (\$8,176) for the 40 units that	
2016-AT-1005-001-A	5/10/2016	materially failed to meet HUD's and its own housing quality standards.	\$108,390
		Require the Authority to provide support justifying the reasonableness and necessity	
		of all travel to conferences and trainings over the 31-month period reviewed. For any	
		portion of the \$102,563 in travel costs that HUD determines to be unreasonable, HUD	
		should require the Authority to repay its HOME and NSP programs with non-Federal	
2016-DE-1005-002-A	9/28/2016	funds.	\$102,563
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
		instruct City officials to reimburse \$101,398 in additional grants owed to the 11	
		homeowners whose grant amounts should have been materially increased as a result	
2017-NY-1001-001-D	11/2/2016	of recalculated duplication of benefits.	\$101,398
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to reimburse the City's CDBG program line of	
		credit for \$100,982, which was used to pay costs that had been paid with CDBG	
2016-NY-1007-002-B	3/30/2016	program income, thus ensuring that these funds can be used for eligible activities.	\$100,982

		Provide documentation to support salary and fringe benefit costs totaling \$109,248 or	
2016-PH-1006-001-B	8/31/2016	repay HUD from non-Federal funds for any amount that it cannot support.	\$77,383
		Take the appropriate actions to resolve the income discrepancies and pursue	
		collection from the applicable households or reimburse its program \$75,619 (\$66,236	
		in housing assistance payments \$9,383 in administrative fees) from non-Federal	
2016-CH-1006-002-A	8/23/2016	funds for the overpayment of housing assistance cited in this finding.	\$66,236
		Require the members to reimburse HUD's FHA insurance fund \$53,885 for the	
2016-AT-1009-001-C	8/2/2016	ineligible project disbursements.	\$53,885
		Reimburse its program \$63,542 from non-Federal funds (\$51,536 in housing assistance	
I		overpayments \$9,236 \$2,770 in associated administrative fees) for the	
2016-CH-1006-001-F	8/23/2016	inappropriate payments.	\$51,536
		Provide documentation to support that \$48,891 was spent for eligible purposes or	
2017-KC-1001-003-B	12/16/2016	reimburse the appropriate projects for the balance.	\$48,891
		Submit supporting documentation showing the eligibility, reasonableness, and	
		allocability of \$38,164 charged to the Emergency programs for unsupported	
I		drawdowns and equipment cost allocations or reimburse the programs from non-	
2016-AT-1012-001-D	8/29/2016	Federal funds.	\$38,164
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
		instruct City officials to repay the Program from non-Federal funds \$32,107 in	
		overpaid grants to homeowners whose grant amounts (1) were not revised to show	
		recalculated duplication of benefits and (2) exceeded the Program's 60 percent	
2017-NY-1001-001-C	11/2/2016	reimbursement rate.	\$32,107
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation to support the	
		income eligibility of the homeowner who received \$30,600 in CDBG funds related to	
		the rebate program. If documentation cannot be provided, the City's CDBG program	
2016-NY-1007-001-P	3/30/2016	line of credit should be reimbursed \$30,600 from non-Federal funds.	\$30,600

		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
		coordinate with the Office of Healthy Homes and Lead Hazard Control to provide	
		technical assistance and instruct City officials to reconcile the discrepancy in the lead	
		test results. If it is determined that the home tested positive for a lead-based paint	
		hazard, City officials should provide supporting documentation showing that the	
		hazard has been removed and the home has achieved clearance, thus ensuring that	
		\$29,019 in CDBG-DR assistance was disbursed for a lead-safe home. If the lead test	
		results are not reconciled and the lead safety of the home is not documented, City	
2017-NY-1001-002-E	11/2/2016	officials should repay the \$29,019 from non-Federal funds.	\$29,019
		Provide support for the \$35,890 in assistance that was based on the unperformed or	
		missing annual recertifications and reimburse HUD for the amount that remains	
2016-SE-1004-001-C	9/12/2016	unsupported.	\$26,890
	, ,	Reimburse its program \$28,199 (\$19,771 \$7,793 \$635) from non-Federal funds for	. ,
		the overpayment of housing assistance and ineligible administrative fees it received	
2016-AT-1014-001-A	9/30/2016	for the deficiencies cited in this report.	\$23,595
	, ,	Pursue collection from the applicable households or reimburse its program \$18,718	. ,
		from non-Federal funds for the overpayment of housing assistance due to unreported	
2016-CH-1006-001-I	8/23/2016	or underreported income.	\$18,718
		Provide support showing that \$17,414 in management fees charged to the projects	
		using a budgeted amount represented actual amounts or repay the difference to each	
2017-KC-1001-001-A	12/16/2016	affected project.	\$17,414
		Reimburse the appropriate projects their portion of \$11,184 that it charged for	
2017-KC-1001-003-A	12/16/2016	ineligible items.	\$11,184
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to reimburse \$9,730 from non-Federal funds to	
		the City's CDBG program line of credit for the ineligible homeowner rehabilitation	
2016-NY-1007-001-R	3/30/2016	assistance provided that exceeded the subsidy limit.	\$9,730
		Reimburse \$7,851 spent on ineligible expenses to the appropriate Operating Fund and	
2016-AT-1008-001-B	7/19/2016	Housing Choice Voucher programs from non-Federal funds.	\$7,851
		Require the Authority to provide support for the unreasonable amount of hotel costs	
		above the local per diem rate. For any portion of the \$22,083 in unreasonable costs	
		(\$16,386 of which is included in costs identified in recommendation 2A) that the	
		Authority cannot support, HUD should require the Authority to repay its HOME and	
2016-DE-1005-002-B	9/28/2016	NSP programs with non-Federal funds.	\$5,697
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		Require the members to reimburse HUD's FHA insurance fund \$11,587 for the	
2016-AT-1009-001-D	8/2/2016	unreasonable nonsufficient funds and overdraft charges.	\$5,558
2010 AT 1003 001 D	0/2/2010	directionable nonsumerene rands and overlande enarges.	75,550
		Direct the Washington, DC, field office to require the grantee to repay its program	
2016-PH-0001-001-F	6/30/2016	\$4,214 from non-Federal funds for the ineligible costs associated with activity 1515.	\$4,214
		Provide adequate support for disbursements or reimburse \$3,588 to the appropriate	
2016-AT-1008-001-C	7/19/2016	Operating Fund and Housing Choice Voucher programs from non-Federal funds.	\$3,588
		We recommend that the Director of the HUD's Buffalo Office of Community Planning	
		and Development instruct City officials to reprogram unexpended funds of \$2,516 on	
		a subgrantee agreement that expired June 30, 2015, for use by other eligible CDBG	
2016-NY-1002-001-C	1/7/2016	activities so that these funds are put to better use.	\$2,516
		Require the Authority to provide support justifying the necessity of the weekend	
		travel that occurred. For any portion of the \$2,134 in weekend travel costs that HUD	
		determines to be unsupported, HUD should require the Authority to repay its HOME	
2016-DE-1005-002-C	9/28/2016	and NSP programs with non-Federal funds.	\$2,134
		Provide documentation to support \$11,268 disbursed for travel or repay HUD from	
2016-PH-1009-001-E	9/30/2016	non-Federal funds any amount that it cannot support.	\$1,838
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to reimburse \$83 from non-Federal funds to	
		the City's CDBG program line of credit for disbursements made for the two contracts	
2016-NY-1007-001-S	3/30/2016	exceeding 10 percent of the cost estimate.	\$83
		We recommend that the Director of the HUD's Buffalo Office of Community Planning	
		and Development instruct City officials to strengthen monitoring procedures for CDBG-	
2016-NY-1002-001-B	1/7/2016	funded subgrantees to ensure compliance with program requirements.	\$0
		We recommend that the Director of the HUD's Buffalo Office of Community Planning	
		and Development instruct City officials to implement procedures to ensure that	
		program income received by subgrantees is properly reported in HUD's integrated	
		Disbursement and Information System and spent before funds are drawn down from	
2016-NY-1002-001-E	1/7/2016	the U.S. Treasury.	\$0

		We recommend that the Director of the HUD's Buffalo Office of Community Planning	
		and Development instruct City officials to strengthen subgrant procedures to ensure	
		that all required documents are received, explanations are obtained when prior	
2016-NY-1002-001-F	1/7/2016	performance does not meet goals, and subgrants are executed in a timely manner.	\$0
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to strengthen controls to ensure compliance with	
		Section 108 contract provisions and regulations requiring disbursement of funds in a	
2016-NY-1003-001-F	2/5/2016	timely manner after drawdown.	\$0
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to implement procedures to ensure that any future	
		CDBG float-funded activities are administered in accordance with HUD regulations	
		requiring that the annual action plan identify the float-funded activity and a	
		commitment to undertake one of the options listed in the regulations if the funds are	
2016-NY-1003-001-H	2/5/2016	unable to be repaid within the required timeframe.	\$0
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to develop and implement procedures to ensure	
		that the City's liens related to HUD-funded loans are not released without repayment	
2016-NY-1003-001-I	2/5/2016	or evidence of due diligence to address delinquent, outstanding loans.	\$0
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to implement procedures to ensure that all HUD-	
		funded procurement is performed in accordance with regulations at 24 CFR 85.36,	
		which require that sealed bid procurements be adequately advertised and involve at	
		least two bids and that independent estimates be documented before bids or	
2016-NY-1003-001-K	2/5/2016	proposals are received.	\$0
		We recommend that the Director of HUD's Buffalo Office of Community Planning and	
		Development instruct City officials to strengthen procedures over subrecipient	
		monitoring to ensure that onsite visits are conducted for all CDBG subrecipients	
		annually as specified in the agreements and that monitoring efforts are adequately	
2016-NY-1003-001-L	2/5/2016	tracked.	\$0

		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to collect and test lead dust samples from the	
		floors and window sills of the 27 homeowner units that received CDBG funds in	
		program years 2012 and 2013 to ensure that the lead dust does not exceed the	
		allowable lead dust standards. If the tests reveal the existence of excessive lead dust,	
		City officials need to reduce the lead dust to the allowable limit, or reimburse the	
		City's CDBG line of credit from non-Federal funds for disbursements previously made	
2016-NY-1801-001-B	2/11/2016	to repair those 27 units.	\$0
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation, such as proof of	
		advertising, bids received, bid analysis reports, cost estimates, contracts, and other	
		applicable records, to support compliance with Federal procurement regulations in the	
2016-NY-1007-001-J	3/30/2016	awarding of the five contracts.	\$0
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation to support	
		compliance with Federal procurement regulations when contracts were awarded to	
2016-NY-1007-001-K	3/30/2016	the three single bidders.	\$0
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation to support the	
		eligibility of the three tenants occupying low- to moderate-income housing units at a	
2016-NY-1007-001-L	3/30/2016	residential property assisted with CDBG funds.	\$0
		We recommend that the Director of HUD's Newark, NJ, Office of Community Planning	
		and Development instruct City officials to provide documentation to support that	
		those laborers employed by the four contractors are compensated in accordance with	
		Davis-Bacon wage rates. If documentation cannot be provided, the City's line of credit	
		should be reimbursed from non-Federal funds for disbursements made to the four	
2016-NY-1007-001-N	3/30/2016	contractors.	\$0
		Direct field offices to include property acquisition and disposition activities as an area	
		of special emphasis when assessing grantee risk and establishing their monitoring	
2016-PH-0001-001-G	6/30/2016	plans and grantee monitoring strategies.	\$0
		Complete the implementation of the new accounting system and ensure it tracks	
2016-AT-1012-001-A	8/29/2016	program funds to a level that supports compliance with HUD requirements.	\$0

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		Require the Authority to develop and implement detailed policies and procedures for	
		the procurement process regarding inspections, competitive bidding, and sealed bids.	
2016-DE-1005-001-C	9/28/2016	HUD should ensure that these procedures include adequate separation of duties.	\$0
		Require the Authority to develop and implement an official drug testing and	
		remediation policy. This policy should include procurement of any goods and services	
		related to the testing and mitigation and a determination of when drug testing is	
2016-DE-1005-001-D	9/28/2016	needed.	\$0
		Require the Authority to develop and implement a travel policy that reflects Federal	
2016-DE-1005-002-D	9/28/2016	travel regulations and guidelines when using Federal funds for travel purposes.	\$0
		Require the Authority to develop and implement a policy that requires more oversight	
2016-DE-1005-002-E	9/28/2016	of the approval of travel authorizations and travel vouchers.	\$0
		For each State grantee that did not meet the stated requirements to demonstrate that	
		its procurement process was proficient, review procurement files for contracts that	
		were paid with funds provided under the Disaster Relief Act and if the procurement	
		did not comply with Federal procurement requirements, require the grantees to repay	
		HUD from non-Federal funds for any amounts that (1) they cannot support or (2) were	
2016-PH-0005-001-B	9/29/2016	not fair and reasonable.	\$0
		Continue to improve the guidance that it provides to grantees to ensure that future	
2016-PH-0005-001-C	9/29/2016	grantee certifications are accurate and supported.	\$0
		Continue to improve its controls to ensure that its staff adequately understands and	
		reviews future grantee certifications to ensure that they are accurate and supported	
2016-PH-0005-001-D	9/29/2016	before certifying that grantees have a proficient procurement process.	\$0
2016-PH-0005-001-E	9/29/2016	Increase monitoring of State grantees that selected the equivalency option.	\$0
		We also recommend that the Director of HUD's Departmental Enforcement Center, in	
		coordination with the Director of HUD's Office of Residential Care Facilities pursue	
		double damages remedies against the responsible parties for the disbursements made	
2016-NY-1010-001-G	9/29/2016	in violation of the projects' regulatory agreements.	\$0
		Provide documentation showing that the amount it paid under the contract was	
		reasonable and necessary or repay HUD from non-Federal funds any amount that it	
2016-PH-1009-001-F	9/30/2016	cannot support.	\$0
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2017-NY-1004-001-B	12/21/2016	with the HUD-approved action plan and Federal and State regulations.	\$0
	40/01/02	costs charged to the Program are allowable, reasonable, and necessary in compliance	
		instruct City officials to strengthen controls over disbursements to ensure that all	
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	
2017-KC-1001-001-D	12/16/2016	appropriate.	\$0
		Verify all management fees charged to the projects from 2013 through 2015 were	
2017-FO-0003-008-P	11/15/2016	needed, forward to HUD's procurement office for closure and deobligation.	\$0
		Review the contracts totaling \$72.8 million to determine validity and if no longer	
2017-FO-0003-002-A	11/15/2016	balances related to HUD's loan guarantee programs.	\$0
		Continue working with ARC and complete the reconciliation and cleanup efforts for	
2017-NY-1001-003-B	11/2/2016	supporting documentation in the Program files.	\$0
		instruct City officials to ensure that all financial reports are accurate and agree with	
	1	We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	, ,
2017-NY-1001-003-A	11/2/2016	procedures.	\$0
		are auditable and comply with the requirements and the City's record-keeping	
		recent documents are identified and filed in the appropriate subfolders, and all files	
		CMS before file closeout to ensure that duplicative documents are archived, the most	
		instruct City officials to complete the planned document and data cleanup process in	
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	,
2017-NY-1001-002-D	11/2/2016	the property achieved clearance must repay the grant.	\$0
		refuse to allow the Program to complete lead hazard work or provide evidence that	
		Program to perform lead-based paint testing or hazard removal. Homeowners who	
		obligation under the terms of the reimbursement grant agreement to allow the	
		technical assistance and instruct City officials to advise homeowners of their	
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs coordinate with the Office of Healthy Homes and Lead Hazard Control to provide	
2017-NY-1001-001-B	11/2/2016	grant amounts resulting from duplication of benefits recalculations.	\$0
2047 NV 4004 004 D	44/2/2046	instruct City officials to execute new grant agreements to show material changes in	¢.
		We recommend that HUD's Acting Deputy Assistant Secretary for Grant Programs	

112 \$7,274,866,445

Recommendation		
Number	Report Date Recommendation Text	Balance Due

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop a method for using the Do Not Pay portal during the underwriting process to	
		identify delinquent child support and delinquent Federal debt to prevent future FHA	
2018-KC-0001-001-A	3/26/2018	loans to ineligible borrowers to put \$1,905,340,944 to better use.	\$1,905,340,944
		Implement a change to regulations at 24 CFR Part 203 to require curtailment of	
		preforeclosure interest and other costs that are caused by lender servicing delays,	
		resulting in \$413,513,975 in funds to be put to better use. This should include	
		updating or seeking statutory authority to update HUD's regulations as necessary and	
		coordinating with HUD's Office of Finance and Budget, well before any changes go	
		through departmental clearance, to ensure that planned curtailment requirements can	
2018-LA-0007-001-A	9/27/2018	be consistently enforced through the claims process.	\$413,513,975
		Ensure that \$399.1 million identified as invalid obligations in fiscal year 2018 is	
2019-FO-0002-002-I	11/14/2018	deobligated as appropriate.	\$399,090,727
		Require Jamaica Hospital Nursing Home to provide support for \$44,483,000 in	
		accounts payable. Any amount that the owner cannot support as reasonable in price	
2018-BO-0001-001-G	9/17/2018	and necessary to the nursing home should be removed from the accounts payable.	\$44,483,000
		Deobligate all obligations marked for deobligation during the departmentwide OOR,	
		including as much as \$51,396,319 in 735 administrative obligations and \$5,350,112 in	
		68 program obligations marked for deobligation as of September 30, 2018.	
2019-FO-0003-005-G	11/15/2018		\$31,041,853
		Require Jamaica Hospital Nursing Home to provide support for \$8,974,000 paid to its	
		related company. Any amount that the owner cannot support as reasonable in price	
2018-BO-0001-001-F	9/17/2018	and necessary to the nursing home should be repaid to the nursing home.	\$8,974,000
		Require the owners of Bishop Wicke Health and Rehabilitation Center, Plaza Village	
		Senior Living, Golden Hill Health Care Center, Immanuel Campus of Care, and their	
		related companies to reimburse the nursing homes for the ineligible expenses of	
2018-BO-0001-001-H	9/17/2018	\$7,027,289.	\$6,916,397
	, , 122	Redesign the partial claim program to eliminate its weaknesses and ensure that partial	, ,= =,===
2018-KC-0004-001-C	9/20/2018	claims benefit from a stronger lien position to put \$6,770,000 to better use.	\$6,770,000
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Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Pursue the collection of the \$5,690,000 in surplus proceeds that HUD was entitled to	
2018-KC-0004-001-A	9/20/2018	receive from 2017 loan terminations.	\$5,690,000
		Review the 473 identified inactive retained obligations with remaining balances	
		totaling	
		\$43,005,703 and close out and deobligate amounts tied to obligations that are no	
2019-FO-0003-005-F	11/15/2018	longer needed.	\$2,441,997
		Coordinate with the Deputy Assistant Secretary for Finance and Budget to board 350	
		manually paid partial claims that were not boarded into SMART, resulting in funds to	
2018-LA-0005-001-B	9/21/2018	be put to better use in the amount of \$2,297,706.	\$2,297,706
		Submit a retroactive request for a waiver to the conflict-of-interest requirements to	
		support payments totaling \$1,499,137 or reimburse the appropriate fund from non-	
2018-PH-1007-002-B	9/25/2018	Federal funds for any amount not covered by a waiver.	\$1,499,137
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that the \$1,294,062 paid to the Long	
		Branch Housing Authority was for eligible, reasonable, necessary, and allocable costs	
		or reimburse its Operating and Capital Fund programs from non-Federal funds for any	
2018-NY-1003-001-A	2/8/2018	amount that it cannot support or that is not considered reasonable.	\$1,294,062
		We recommend that the Southwest Region Director of Multifamily Housing require	
		Villa Main Apartments owner to provide support that the subsidized 43 units without	
		annual physical inspections, without required EIV reports, or with missing files were	
2018-FW-1002-001-B	1/31/2018	eligible or repay HUD \$1,095,364 for those subsidies.	\$1,095,364
		Coordinate with the Deputy Assistant Secretary for Finance and Budget to record	
		lender payments to update the balances for 139 loans in SMART, resulting in funds to	
2018-LA-0005-001-F	9/21/2018	be put to better use in the amount of \$1,055,113.	\$1,055,113
		Provide documentation to support \$1 million in community policing salary costs or	
2018-PH-1008-001-D	9/26/2018	repay the program from non-Federal funds for any amount that it cannot support.	\$1,000,000

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's New Orleans Office of Community Planning	
		and Development require the Parish to support or repay its program from non-Federal	
		funds \$1,020,121 for payments made (1) for work that the contractor(s) did not	
		perform and excessive material costs; (2) that lacked adequate supporting	
		documentation for change orders, independent cost estimates, and invoice	
		documentation; or (3) for the 10 HOME-funded rehabilitated homes not brought up to	
2018-FW-1001-001-C	1/29/2018	code.	\$980,362
		We recommend that the Director of HUD's New York Office of Public and Indian	
		Housing require the Authority to obtain retroactive approval from HUD for the	
		\$815,398 in outstanding unauthorized loans made to its nonprofit entity or reimburse	
		its Public Housing Operating Fund from non-Federal funds for any amount for which it	
		does not obtain approval. If approval is obtained, HUD should also require the	
		Authority to execute a loan agreement with the nonprofit entity and properly record	
2018-NY-1002-001-A	1/19/2018	the loans in its books and records.	\$815,398
		Provide documentation to support the \$811,325 in code enforcement costs (activities	
		591, 619, and 645), including meeting code enforcement and salary and benefit	
2018-LA-1003-001-A	3/29/2018	requirements,4 or repay the program from non-Federal funds.	\$811,325
		Provide documentation to support \$671,838 in code enforcement costs or repay the	
2018-PH-1008-001-B	9/26/2018	program from non-Federal funds for any amount that it cannot support.	\$671,838
		Obtain the missing mortgage documents for 33 loans and the missing note documents	
		for 40 loans, totaling \$644,767 in partial claim notes, and require any unrecorded	
		mortgage documents to be recorded at the appropriate county's office to ensure that	
		HUD's interests are protected. For any missing documents that cannot be obtained,	
		the Deputy Assistant Secretary should require the lender to reimburse HUD for the	
2018-LA-0005-001-D	9/21/2018	partial claim note.	\$644,767
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to provide documentation to show that the \$594,012 disbursed due to the use of	
		multipliers was for eligible, reasonable, necessary, and supported costs or reimburse	
2018-NY-1007-001-A	9/27/2018	its program from non-Federal funds.	\$594,012

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Southwest Region Director of Multifamily Housing require	
		Villa Main Apartments owner to repay HUD \$534,741 for 39 subsidized units with	
2018-FW-1002-001-A	1/31/2018	ineligible "ghost" tenants.	\$534,741
		Repay to the program from non-Federal funds the \$457,192 (\$380,526 \$48,420	
		\$28,246) in NSP funds spent for the construction, air conditioning, and engineering	
2018-AT-1005-001-A	5/29/2018	services in instances in which procurement activities were not adequately performed.	\$457,192
		Provide documentation to show that disbursements totaling \$2,136,849 and any bank	
		transfers to the owner's non-project accounts that occurred outside of our audit	
		period were reasonable and necessary expenses for the operation of the project or	
2018-PH-1006-001-A	9/21/2018	repay the project from non-project funds for any amount that it cannot support.	\$416,471
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that the \$326,096 paid for goods and	
		services was reasonable or reimburse its Operating and Capital Fund programs from	
		non-Federal funds for any amount that it cannot support or that is not considered	
2018-NY-1003-001-C	2/8/2018	reasonable.	\$286,440
		Provide documentation to support \$285,496 in graffiti abatement expenditures or	
2018-LA-1003-002-A	3/29/2018	repay the program from non-Federal funds (appendix D).	\$285,496
		Repay to the program from non-Federal funds \$280,979 in NSP funds spent for	
		property 1012 and identify and repay any additional costs spent on this property,	
2018-AT-1005-001-B	5/29/2018	including maintenance costs and any program income generated.	\$280,979
		Provide documentation to support \$280,561 (housing assistance and utility allowance	
		payments totaling \$237,809 for families that did not meet eligibility requirements and	
		\$42,752 in administrative fees) or reimburse its program from non-Federal funds for	
2018-PH-1003-001-A	3/30/2018	any amounts it cannot support.	\$280,561

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that the \$252,000 paid to the Long	
		Branch Housing Authority was for eligible, reasonable, necessary, and allocable costs	
		or reimburse its Operating and Capital Fund programs from non-Federal funds for any	
2018-NY-1005-001-A	9/26/2018	amount that it cannot support or that is not considered reasonable.	\$252,000
		Provide documentation to show that indirect payroll expenses totaling \$225,182	
		charged to the program were reasonable and necessary or repay its program from non-	
2018-PH-1005-001-C	9/19/2018	Federal funds for any amount that it cannot support.	\$222,150
		Provide sufficient documentation to support that it disbursed the \$199,604 in program	
		funds, which it determined were inappropriate housing or utility assistance payments,	
		and that it made a reasonable effort to collect the debts. If the Agency cannot provide	
		sufficient documentation to support the disbursements and that the debts were	
		uncollectable, it should reimburse its program from non-Federal funds as appropriate.	
		If the Agency provides sufficient documentation to support the disbursements but	
		cannot provide sufficient documentation to support that the debts were	
		uncollectable, it should make a reasonable effort to collect from the debtors or	
		reimburse its program from non-Federal funds as appropriate.	
2018-CH-1002-001-A	8/1/2018		\$199,604
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that \$172,538 paid for goods and	
		services was reasonable or reimburse its Operating and Capital Fund programs from	
		non-Federal funds for any amount that it cannot support or that is not considered	
2018-NY-1005-001-D	9/26/2018	reasonable.	\$172,538
		Provide documentation to show that products and services totaling \$171,822 were	
		purchased at fair and reasonable prices. For any amounts determined to be	
		unreasonable and not supported, the Authority should reimburse the program from	
2018-PH-1007-003-A	9/25/2018	non-Federal funds.	\$171,822
		Reimburse its program \$170,784 from non-Federal funds for the ineligible salary	
2018-PH-1007-003-B	9/25/2018	payments and ongoing security payments.	\$170,784

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that the \$161,600 paid for legal, fee	
		accounting, and auditing services was for prices that were reasonable and that the	
		costs were properly allocated among the Authority's programs or reimburse its	
		Operating and Capital Fund programs from non-Federal funds for any amount that it	
2018-NY-1005-001-C	9/26/2018	cannot support or is not considered reasonable.	\$161,600
		Provide documentation to support the \$137,500 paid for security services from	
		operating funds or reimburse its program from non-Federal funds for any costs that it	
2018-PH-1007-001-A	9/25/2018	cannot support.	\$137,500
		Deobligate all obligations marked for deobligation during the departmentwide OOR,	
		including as much as \$7,517,486 in 187 program obligations and \$62,183 in 9	
2019-FO-0003-005-E	11/15/2018	administrative obligations marked for deobligation as of September 30, 2018.	\$121,883
		Reimburse its program \$119,023 from non-Federal funds for the ineligible housing	
		assistance payments it made due to the conflict-of-interest situation identified by the	
		audit and any additional ineligible housing assistance payments it made outside our	
2018-PH-1003-002-A	3/30/2018	review period.	\$119,023
		We recommend that the Director of HUD's Newark Office of Public and Indian Housing	
		require the Authority to reimburse its program \$111,651 from non-Federal funds	
		(\$110,943 for housing assistance payments and \$708 in associated inspection service	
2018-NY-1008-001-B	9/28/2018	fees) for the 23 units that materially failed to meet HUD's housing quality standards.	\$111,651
		Reimburse its program \$111,568 from non-Federal funds for the ineligible payments it	
2018-PH-1007-002-A	9/25/2018	made due to the conflict-of-interest situations identified by the audit.	\$111,568
		We recommend that the Director of HUD's New York Office of Public and Indian	
		Housing require the Authority to provide documentation to show that \$108,061 in	
		property disposition proceeds was used for the activities outlined in its HUD-approved	
		disposition application and modifications or reimburse its Operating Fund from non-	
2018-NY-1002-001-B	1/19/2018	Federal funds for any amount not supported.	\$108,061

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Enforce the indemnification agreement in the attached settlement agreement to	
		prevent an estimated \$95,769 loss to HUD. This represents an amount due HUD from	
		MetLife for Indemnifying and holding HUD harmless for any and all losses HUD incurs	
2018-CF-1801-001-B	3/23/2018	or has incurred in connection with FHA loan number 137-4740973.	\$95,769
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to reimburse its Operating Fund from non-Federal funds for the \$75,722	
2018-NY-1003-001-I	2/8/2018	settlement payment made to the State of New Jersey.	\$75,722
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that it had valid contracts in place	
		before disbursing \$125,589 to three vendors or reimburse its Operating and Capital	
2018-NY-1003-001-D	2/8/2018	Fund programs from non-Federal funds for any amount that it cannot support.	\$73,660
		Repay to the program from non-Federal funds the \$73,400 in NSP funds spent for	
2018-AT-1005-001-C	5/29/2018	mold and asbestos remediation work.	\$73,400
		Reimburse its program \$153,222 from non-Federal funds for the housing assistance	
		paid for the 50 units that materially failed to meet HUD's housing quality standards	
2019-CH-1001-001-B	12/20/2018	and its own requirements.	\$69,222
		Support the unsupported amount of match for its subgrantee or repay HUD \$54,473	
2018-LA-1002-001-A	2/23/2018	from non-Federal funds (appendix D).	\$54,473
		Provide documentation to show that administrative fees totaling \$47,376 were used	
		to perform administrative duties for the program or repay its program from non-	
2018-PH-1005-001-E	9/19/2018	Federal funds for any amount that it cannot support.	\$44,344
		We recommend that the Director of HUD's Newark Office of Public Housing require	
		the Authority to provide documentation to show that \$36,508 disbursed1 was for	
		authorized and approved costs or reimburse its Operating and Capital Fund programs	
2018-NY-1005-001-E	9/26/2018	from non-Federal funds for any amount that it cannot support.	\$36,508
		Deobligate all obligations marked for deobligation during the departmentwide OOR,	
		including as much as \$574,511 in 79 administrative obligations marked for	
2019-FO-0003-005-M	11/15/2018	deobligation as of September 30, 2018.	\$35,225

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support that lead-based paint hazard control activities were necessary at 13 assisted	
		units or reimburse its Program \$23,857 from non-Federal funds for the unsupported	
2018-CH-1010-001-H	9/30/2018	lead-based paint hazard control activities completed at these assisted units.	\$23,857
		Reimburse its program \$15,796 from non-Federal funds for administrative fees earned	
		for the 50 units that materially failed to meet HUD's housing quality standards and its	
2019-CH-1001-001-C	12/20/2018	own requirements.	\$15,796
		Support sampled retroactive payroll costs totaling \$12,109, which correspond to the	
		actual time attributed to grants CA0689L9D011502, CA0880L9D011501,	
		CA0881L9D011501, and CA0945L9D011506, or reimburse HUD from non-Federal	
2018-LA-1002-002-A	2/23/2018	funds.	\$12,109
		Reimburse its program \$9,870 (\$7,663 \$2,207) from non-Federal funds for the	
		administrative fees it inappropriately earned for the missing required eligibility	
2019-CH-1001-002-D	12/20/2018	documentation and inappropriate calculations of housing assistance.	\$9,597
		Provide documentation to support the \$8,919 in NSP funds spent on rehabilitation	
2018-AT-1005-001-D	5/29/2018	costs or repay to the program from non-Federal funds.	\$8,919
		We recommend that HUD's Office of General Counsel, Office of Program Enforcement,	
		acknowledge that the \$40,000 in the settlement agreement represents an amount due	
2018-FW-1802-001-A	8/21/2018	HUD.	\$8,680
		We recommend that the Director of HUD's Newark Office of Public and Indian Housing	
		require the Authority to reimburse its program \$4,459 from non-Federal funds for	
		housing assistance payments that should have been abated for units that did not meet	
2018-NY-1008-001-D	9/28/2018	housing quality standards.	\$4,459
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to provide documentation to show that the \$2,689 disbursed due to a higher than	
		required overtime rate was supported by documentation from the trade unions or	
2018-NY-1007-001-B	9/27/2018	reimburse its program from non-Federal funds.	\$2,689
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to reimburse its program \$1,198 from non-Federal funds for overpaid wages due	
2018-NY-1007-001-C	9/27/2018	to billing and payroll errors.	\$1,198

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to pay \$544 in unpaid wages to the subcontractors of the affected employees and	
2018-NY-1007-001-D	9/27/2018	submit evidence that these employees have been paid.	\$544
		We recommend that the Director of HUD's New Orleans Office of Community Planning	
		and Development require the Parish to correct the property deficiencies identified	
2018-FW-1001-001-E	1/29/2018	during the onsite inspections related to the 20 contracts as applicable.	\$0
		We recommend that the Director of HUD's New Orleans Office of Community Planning	
		and Development require the Parish to inspect the remaining 33 homes for	
		compliance with the contract specifications and HUD requirements and correct	
2018-FW-1001-001-F	1/29/2018	deficiencies as applicable.	\$0
		We recommend that the Southwest Region Director of Multifamily Housing require	
		Villa Main Apartments owner to implement appropriate controls to ensure tenants	
		are eligible, housing assistance subsidies are accurate, and that units are inspected as	
2018-FW-1002-001-C	1/31/2018	required.	\$0
		We further recommend that the Southwest Region Director of Multifamily Housing	
		verify that the owner is providing oversight to its onsite staff and its recently	
		implemented quality control program is working as designed and in accordance with	
2018-FW-1002-001-D	1/31/2018	HUD requirements.	\$0
		We further recommend that the Southwest Region Director of Multifamily Housing	
		ensure that the project-based contract administrator's review process includes steps	
		to obtain reasonable assurance that tenants being reported as subsidized at Villa Main	
2018-FW-1002-001-E	1/31/2018	qualify for the program and live in the subsidized units.	\$0
		Implement written procedures to include the confirmation of match funds as part of	
2018-LA-1002-001-B	2/23/2018	its annual monitoring reviews of each subgrantee.	\$0
		Develop and implement a written plan for its subgrantees to provide and submit	
2018-LA-1002-001-C	2/23/2018	supporting documentation for match funds at the end of each grant term.	\$0
		Identify retroactive payroll for remaining grants (CA1162L9D011504,	
		CA1024L9D011501, CA0694L9D011508, and CA0693L9D011508) and provide adequate	
2018-LA-1002-002-B	2/23/2018	documentation to support the cost or repay HUD from non-Federal funds.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop and implement additional procedures and controls to ensure that payroll	
2018-LA-1002-002-C	2/23/2018	costs charged to the grant reconcile to actual hours worked on the grants.	\$0
		Revise the single-family handbook to comply with regulations that prevent loans to	
2018-KC-0001-001-B	3/26/2018	borrowers with delinquent child support subject to Federal offset.	\$0
		Develop and implement a targeted code enforcement strategy that specifies	
		deteriorating or deteriorated areas where code enforcement would be expected to	
		arrest decline. The strategy should include a description of public or private	
		improvements, rehabilitation, or services that would help facilitate code enforcement	
2018-LA-1003-001-B	3/29/2018	and also include performance metrics to track progress.	\$0
		Develop and implement policies and procedures to ensure that code enforcement	
		salaries and benefits are charged and documented in accordance with program	
2018-LA-1003-001-C	3/29/2018	requirements.	\$0
		Develop and implement procedures and controls to ensure that graffiti abatement	
		expenditures, including salaries and benefits, are accurately charged to CDBG grants	
2018-LA-1003-002-B	3/29/2018	and properly supported.	\$0
		Provide documentation to support a reconciliation between financial records and	
		DRGR and report in HUD's DRGR system the appropriate amount of program income	
2018-AT-1005-001-E	5/29/2018	generated from all NSP1 and NSP3 funds from the inception of the grants.	\$0
		Provide documentation to support that all NSP properties are properly classified and	
2018-AT-1005-001-F	5/29/2018	recorded in HUD's DRGR system.	\$0
		Develop and implement policies and procedures to include but not be limited to	
		oversight, effective internal controls, separation of duties, procurement, and overall	
2018-AT-1005-001-G	5/29/2018	administration of the program.	\$0
		Conduct a review of the remaining 10 properties not reviewed during our audit to	
		ensure compliance with HUD requirements and identify and repay costs related to	
2018-AT-1005-001-H	5/29/2018	ineligible or unsupported activities (see appendix C).	\$0
		Work with the Office of Lead Hazard Control and Healthy Homes to update HUD's	
		regulations to expand the inspection and abatement requirements of 24 CFR Part 35	
		to housing completed after 1977 in cases in which a child with an elevated blood lead	
2018-CH-0002-001-F	6/14/2018	level is reported.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Acting Director of OBGA work with HUD's Office of General	
2018-FW-0002-001-A	7/23/2018	Counsel to create a codified Disaster Recovery program.	\$0
		Develop and implement internal policies and procedures to ensure that approved	
		underwriters are accurately maintained and kept current in the origination systems	
2018-LA-0801-001-A	8/27/2018	for the Section 184 program.	\$0
		Develop a comprehensive plan to continue to seek indemnification statutory	
		authority, including consideration to include indemnification authority language in	
		draft regulations currently being considered. Until statutory authority is obtained,	
		develop and implement internal policies and procedures for the voluntary	
		indemnification process, to include a voluntary indemnification agreement, followup	
		procedures, and resolution procedures. Procedures should be revised once statutory	
2018-LA-0801-001-B	8/27/2018	authority is obtained.	\$0
		Support line item expenditures for the administrative contract expense fund for fiscal	
		years 2015 to 2018. OLG should repay the U.S. Department of the Treasury for any	
2018-LA-0801-001-D	8/27/2018	expenditures that cannot be supported.	\$0
		Develop and implement policies and procedures, coordinating with other program	
		offices as needed, to track and make administrative contract expense fund	
2018-LA-0801-001-E	8/27/2018	expenditures readily available for review.	\$0
		Develop and implement a comprehensive plan to use unobligated administrative	
2018-LA-0801-001-F	8/27/2018	contract expense funds.	\$0
2018-DE-1001-003-A	9/6/2018	Submit any outstanding audited financial statements.	\$0
		Develop and implement computerized controls to flag blank data fields and illogical	
2018-BO-0001-002-A	9/17/2018	financial data.	\$0
		Develop and implement procedures to require owners, operators, and lenders to	
2018-BO-0001-002-B	9/17/2018	submit accurate and complete financial data.	\$0
		Strengthen controls over program oversight to ensure that grantees comply with their	
		agreements and program requirements, including tier two environmental reviews,	
		contract procurements, and homeowner and project eligibility, to ensure that (1) all	
		income, including rental income, is considered; (2) loan-to-value ratios do not exceed	
		90 percent without State approval; and (3) projects do not exceed the program limits	
2018-BO-1005-001-F	9/19/2018	without State approval.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Strengthen controls over monitoring to ensure that onsite monitoring and monitoring	
		letters are completed in a timely manner and sufficient supporting documentation is	
2018-BO-1005-001-G	9/19/2018	required and reviewed by those responsible for grant oversight.	\$0
		Implement a policy to require servicers to send surplus proceeds notifications to the	
		HUD Secretary-held assets servicing contractor and establish procedures to improve	
2018-KC-0004-001-B	9/20/2018	HUD's surplus proceeds collection efforts.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Housing Counseling update	
		its policies and procedures to ensure consistency and adequacy of the agency	
		approval, performance review, voucher approval, and termination and	
		posttermination processes. Specifically, the updates should ensure that the	
		deficiencies identified in this report are acknowledged and corrected going forward,	
		including (1) updating the Housing Counseling Program handbook and developing or	
		updating standard operating procedures for each of the key processes and (2)	
		implementing controls to ensure that staff perform work properly and consistently,	
		and maintain significant documentation provided by agencies, along with any analysis	
2018-NY-0001-001-C	9/24/2018	performed during reviews.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to provide training to its staff to help ensure compliance with applicable cost	
2018-NY-1007-001-E	9/27/2018	principle, procurement, and Davis-Bacon requirements.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to provide documentation showing that it has strengthened its invoice review	
		process to ensure that costs are eligible and supported before disbursing Disaster	
2018-NY-1007-001-F	9/27/2018	Recovery funds.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		City to provide documentation showing that payments made under the Rockaway	
		Boardwalk construction management services contract complied with Davis-Bacon	
		and Related Acts requirements and that restitution is made to affected workers for	
2018-NY-1007-001-G	9/27/2018	any underpayments identified.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Deputy Assistant Secretary for Grant Programs require the	
		State to implement additional controls and revise policies and procedures to ensure	
		that adequate documentation is maintained in its files to support (1) recapture	
		decisions, (2) eligibility related to ownership or occupancy, (3) ineligible decisions, (4)	
		elevation considerations, and (5) mitigation of duplication of benefits issues related to	
		override procedures and incorrect data provided by other agencies.	
2018-FW-1007-001-C	9/28/2018		\$0

96 \$2,842,270,212

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Ensure that \$1,045,085 in CDBG funds drawn from HUD between July 1, 2015, and	
		October 31, 2018, can be traced to a level, which ensures that such funds have not	
		been used in violation of the restrictions and prohibitions of applicable statutes, or	
		reimburse the CDBG program from non-Federal funds. Footnote 2: Total drawdowns of	
		more than \$1.5 million were adjusted to consider \$106 questioned in recommendation	
2019-KC-0003-001-A	9/30/2019	1D and \$469,974 in recommendation 2A.	\$6,130,757,970
		Require lenders to obtain the borrowers' consent to verify the existence of delinquent	
		Federal taxes with the IRS during loan origination and deny any applicant with	
		delinquent Federal tax debt and no payment plan or a noncompliant payment plan or	
		an applicant refusing to provide consent from receiving FHA insurance to put at least	
2019-NY-1002-001-B	5/29/2019	\$6.1 billion to better use by avoiding potential future costs to the FHA insurance fund.	\$361,465,173
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to support the appraised fair market values of the 942	
		other properties included in our sampling universe to ensure that \$361,465,173 in	
		settlement costs was supported. This recommendation includes but is not limited to	
		providing support to show that appraisals contained accurate and verified information	
		for the subject and comparable properties, time adjustments were supported, and	
		other adjustments were supported. If support cannot be provided, the State should	
2019-NY-1002-001-D	5/29/2019	reimburse the unsupported costs from non-Federal funds.	\$93,350,616
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to reimburse from non-Federal funds the \$783,571 paid to purchase two	
		properties that did not comply with flood hazard requirements and for which the State	
		did not have sufficient documentation to show that the properties were substantially	
		damaged. Further, the State should identify and reimburse from non-Federal funds any	
2019-KC-0001-001-B	4/11/2019	additional Disaster Recovery funds used to acquire and dispose of the properties.	\$27,100,000

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to strengthen controls over the property valuation process for its program to	
		ensure that up to \$93,350,616 not yet disbursed is put to better use. This	
		recommendation includes but is not limited to implementing a process to review the	
		appraisal and quality control work to ensure that appraised fair market values are	
		supported and that quality control reviews are performed as required by Federal, State,	
		and industry standards and to take appropriate action for cases in which the work does	
2019-KC-0002-001-A	6/25/2019	not comply with requirements.	\$13,669,007
		Design controls to protect the insurance fund from improper partial claims that did not	
2019-NY-1002-001-A	5/29/2019	reinstate the loans to put \$27.1 million to better use.	\$5,920,097
		Provide documentation to support housing assistance payments the projects received	
		totaling \$497,762 or reimburse HUD from nonproject funds for any amount that it	
2019-LA-0801-001-A	7/15/2019	cannot support.	\$5,115,079
		Issue guidance to PHAs to ensure any applicant for or tenant of public or assisted	
		housing whose name appears on the SAM excluded parties list are reviewed by PHAs to	
		determine eligibility in a manner consistent with the regulations in 2 CFR 180 and 2424	
		so that ineligible applicants or tenants are not admitted or recertified to put up to	
2019-NY-1001-001-F	3/29/2019	\$13.7 million to better use.	\$4,158,836
		Reallocate the \$487,483 in unspent funds to ensure that they will be put to their	
		intended use or, if the activities remain open, maintain support to show that the HOME	
		funds disbursed were reasonable and Reallocate the \$487,483 in unspent funds to	
		ensure that they will be put to their intended use or, if the activities remain open,	
		maintain support to show that the HOME funds disbursed were reasonable and	
2019-BO-1001-001-B	4/25/2019	supported in accordance with Federal requirements.	\$3,136,798

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to support the appraised fair market values of the 14	
		properties sampled to ensure that \$5,920,097 in settlement costs was supported. This	
		recommendation includes but is not limited to providing support to show that	
		appraisals contained accurate and verified information for the subject and comparable	
		properties, time adjustments were supported, and other adjustments were supported.	
		If support cannot be provided, the State should reimburse the unsupported costs from	
2019-NY-1002-002-A	5/29/2019	non-Federal funds.	\$3,119,209
		Provide support of eligibility or require lender repayment of \$5,115,079 for the 822	
		identified claims with a reported partial claim or loan modification within the prior 24	
2019-NY-1001-001-A	3/29/2019	months.	\$2,595,127
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to show that the remaining nine properties were	
		substantially damaged or reimburse from non-Federal funds the \$4,158,836 paid to	
		purchase the properties. Further, the State should identify and reimburse from non-	
		Federal funds any additional Disaster Recovery funds used to acquire and dispose of	
2019-NY-1001-001-E	3/29/2019	the nine properties.	\$1,336,883
		Submit supporting documentation showing how \$469,974 in CDBG funds disbursed for	
		street improvements was properly used and in accordance with HUD requirements or	
2019-AT-1004-001-B	6/14/2019	reimburse the CDBG program from non-Federal funds.	\$1,300,000
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to support the hardship letter provided for a property	
		located outside the 500-year floodplain and documentation to show that the property	
		was substantially damaged or reimburse from non-Federal funds the \$435,069 in	
		settlement costs paid to purchase the property. Further, the State should identify and	
		reimburse from non-Federal funds any additional Disaster Recovery funds used to	
2019-AT-1004-001-D	6/14/2019	acquire and dispose of the property.	\$1,186,105
		Repay from non-Federal funds the \$422,768 in ineligible funds related to the City's	
		failure to meet HOME CHDO commitment deadlines and complete activities in	
2019-AT-1005-001-B	8/9/2019	accordance with the HOME agreement and HOME regulations.	\$1,045,085

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support that \$3,136,798 in HOME funds disbursed was reasonable and supported in	
		accordance with Federal requirements or repay from non-Federal funds any amount	
2019-NY-1001-001-B	3/29/2019	that cannot be supported.	\$783,571
		Put \$417,113 in unspent NSP1 funds associated with three activities to better use by	
		reprogramming the funds to other subrecipients using an appropriate method or return	
2019-PH-1003-001-A	8/2/2019	the funds to HUD.	\$497,762
2019-BO-1001-001-D	4/25/2019	Repay from non-Federal funds the \$665,920 in ineligible costs charged to the program	\$487,483
		Enforce its policy or implement an alternate method for the CoC program to ensure	
		that annual recertifications are completed in a timely manner and that housing	
		assistance is not issued before the recertification is completed to ensure that \$385,660	
2019-AT-1005-002-A	8/9/2019	in program funds is appropriately used for future payments.	\$469,974
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to show that \$3,119,209 paid for appraisals and post	
		storm addenda performed by its contractor was reasonable, supported, and for	
		services that were performed in accordance with applicable requirements or reimburse	
2019-NY-1001-001-C	3/29/2019	any unsupported costs from non-Federal funds.	\$435,069
		Identify, review, and approve a CHDO to work with the City to ensure that \$254,215 in	
2019-BO-1001-001-A	4/25/2019	CHDO funds will be properly committed to avoid being deobligated.	\$422,768
		Acknowledge that the attached settlement agreement of \$325,000 represents an	
2019-AT-1004-001-A	6/14/2019	amount due HUD from Pacific Horizon.	\$417,113
		Conduct criminal record background checks in accordance with the project's policies	
		and procedures to ensure that adult members of all households, including the 11	
		households for which HUD made housing assistance payments totaling \$239,500, were	
		eligible to participate in the program. If the participants are deemed ineligible, the	
		owner should follow applicable regulations to terminate or modify assistance and	
		reimburse HUD from nonproject funds for those housing assistance payments deemed	
2019-AT-1002-001-F	3/18/2019	ineligible.	\$385,660
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to reimburse from non-Federal funds the \$183,500 in incentives paid to a	
2019-BO-1001-001-E	4/25/2019	homeowner that failed to maintain flood insurance.	\$254,215

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support or reimburse HUD \$159,938 from nonproject funds for the unsupported	
2019-CH-1003-001-I	9/3/2019	payments of housing assistance cited in the finding.	\$239,500
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to reimburse from non-Federal funds the \$2,595,127 paid to purchase six	
		properties that were not substantially damaged. Further, the State should identify and	
		reimburse from non-Federal funds any additional Disaster Recovery funds used to	
2019-NY-1001-001-D	3/29/2019	acquire and dispose of the properties.	\$183,500
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to show that \$156,940 paid for sales brochures,	
		economic land analysis studies, and consultant fees was reasonable, necessary,	
	0/0/00/0	supported, and for services that were performed in accordance with applicable	4
2019-CH-1003-001-C	9/3/2019	requirements or reimburse any unsupported costs from non-Federal funds.	\$159,938
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to show that the five properties for which the	
		homeowners failed to maintain flood insurance were eligible for assistance and	
		documentation to show that the properties were substantially damaged or reimburse	
		from non-Federal funds the \$1,336,883 paid to purchase the properties, including	
		incentives for one property. Further, the State should identify and reimburse from non-	
		Federal funds any additional Disaster Recovery funds used to acquire and dispose of	
2019-NY-1002-002-B	5/29/2019	the properties.	\$156,940
		Support that the City properly administered the HOME program and earned \$130,667	
		in HOME administrative fees or repay from non-Federal funds any amount that cannot	
2019-BO-1001-001-C	4/25/2019	be supported	\$130,667
		Support or reimburse its NSP1 grant \$1,300,000 from non-Federal funds for the	
2019-NY-1002-002-D	5/29/2019	unsupported reallocation of grant funds.	\$118,800
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to show that \$118,800 paid to the State's contractor	
		for appraisals performed by its subcontractors was reasonable, supported, and for	
		services that were performed in accordance with applicable requirements or reimburse	
2019-AT-1002-001-C	3/18/2019	any unsupported costs from non-Federal funds.	\$112,827

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support or reimburse the appropriate NSP grant \$1,186,105 from non-Federal funds for	
2019-NY-1002-002-C	5/29/2019	the unsupported subrecipient and administrative expenditures.	\$75,006
		Reimburse its CoC program \$112,827 (\$109,259 \$3,568) from non-Federal funds for	
		the overpayment of housing assistance due to inappropriate recertifications and	
2019-CH-1003-001-E	9/3/2019	calculations of housing assistance.	\$54,257
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation to show that \$75,006 used for appraisal quality control	
		reviews was for services that complied with applicable requirements or reimburse any	
2019-CH-1003-001-A	9/3/2019	unsupported costs from non-Federal funds.	\$30,037
		Implement adequate quality control procedures to ensure that housing assistance	
		payments are appropriately calculated and supported. These procedures and controls	
		should ensure that \$54,257 in program funds is appropriately used for future	
2019-CH-1003-001-D	9/3/2019	payments.	\$26,915
		Reimburse HUD \$30,037 from nonproject funds for the overpayment of housing	
2019-FW-1005-001-D	7/11/2019	assistance and utility allowances due to incorrect calculations.	\$25,162
		Pursue collection from the applicable household or reimburse HUD \$26,915 from	
2019-AT-1002-001-A	3/18/2019	nonproject funds for the overpayment of housing assistance due to unreported income.	\$10,389
		We recommend that the Director of HUD's New Orleans Office of Community Planning	
		and Development require Northlake to	
		support \$47,679 or repay its program from non-Federal funds for payments made to	
2019-AT-1002-001-E	3/18/2019	contractors without written contracts and independent cost estimates.	\$7,309
		Reimburse its HOME program \$10,389 (\$8,797 \$1,592) from non-Federal funds for the	
		overpayment of housing assistance due to inappropriate recertifications and	
2019-AT-1005-001-C	8/9/2019	calculations of housing assistance.	\$1,641
		Support or reimburse its CoC program \$7,309 from non-Federal funds for the	
2019-AT-1002-001-B	3/18/2019	unsupported housing assistance payments.	\$468
		Require the Municipality to return to its line of credit and put to better use \$1,641	
		associated with the unspent program funds that have been carried over since	
2019-AT-1002-001-D	3/18/2019	December 2017.	\$260

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Reimburse the four HOME program participants \$468 from program funds for the	
		underpayment of housing assistance due to inappropriate calculations of housing	
2019-AT-1002-001-G	3/18/2019	assistance.	\$0
		Reimburse the three CoC program participants \$260 from program funds for the	
		underpayment of housing assistance due to inappropriate calculations of housing	
2019-NY-1001-001-G	3/29/2019	assistance.	\$0
		Train its program staff on calculating housing assistance payments for the HOME and	
2019-NY-1001-001-H	3/29/2019	CoC programs to ensure that payments are appropriately calculated.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to conduct a review of the universe of properties purchased through the	
		acquisition component of its program to ensure that properties were eligible and	
		reimburse from non-Federal funds the Disaster Recovery funds used in connection with	
		any additional properties found to be ineligible. For example, the State's review could	
		include verification that (1) its files contained the required substantial damage letters,	
		(2) the letters provided by applicants reflected the most recent substantial damage	
		determination made by local officials, (3) substantial damage determinations were	
		adequately supported, (4) properties met flood hazard requirements, and (5)	
2019-FW-1001-001-A	4/23/2019	properties were not FEMA-noncompliant.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the	
		State to provide documentation showing that the acquisition component of its program	
		has ended or improve its controls over the program to ensure that properties	
		purchased are eligible. This recommendation includes but is not limited to updating its	
		policies and procedures and implementing verification processes to ensure that it	
2019-BO-1001-001-F	4/25/2019	verifies information provided by applicants and other entities.	\$0
		We recommend that the Little Rock Acting PIH Director require the Authority to	
		develop and implement an achievable plan to close the remaining projects and	
2019-BO-1001-001-G	4/25/2019	complete its RAD program conversions.	\$0
		Establish underwriting policies and procedures to ensure that HOME activities are	
2019-BO-1001-001-H	4/25/2019	consistent and meet Federal requirements.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop and implement adequate environmental policies and procedures to ensure	
		that environmental reviews are properly documented and supported and that HUD and	
		Federal environmental requirements have been followed before committing HOME	
2019-BO-1001-001-I	4/25/2019	funds to an activity.	\$0
		Develop and implement adequate policies and procedures to ensure that fixed HOME	
		units are identified and adequate documentation is maintained to support tenant	
2019-BO-1001-001-J	4/25/2019	eligibility and compliance with HOME rental limits for the entire affordability period.	\$0
		Develop and implement tools to improve record-keeping practices to support the	
2019-NY-1002-001-C	5/29/2019	eligibility, necessity, and reasonableness of the HOME activities.	\$0
		Provide technical assistance to the City to ensure that responsible staff receives	
2019-NY-1002-002-E	5/29/2019	necessary environmental, underwriting, and overall program administration training.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the State to provide documentation to support the appraised fair market values of any other properties purchased under the program since January 2016 that relied upon appraisals conducted by the contractors discussed in this report to ensure that settlement costs for those properties were supported. If support cannot be provided,	
2019-NY-1002-002-F	5/29/2019	the State should reimburse the unsupported costs from non-Federal funds.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the State to execute an agreement with the City for the use of appraisal services and obtain documentation to show that services were procured in accordance with applicable requirements and that contracts contained all required provisions. If the State cannot provide the executed agreement and documentation, HUD should use one or more of	
2019-AT-1004-001-C	6/14/2019	the remedies for noncompliance in 24 CFR 570.495.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Grant Programs require the State to strengthen controls to ensure that future Disaster Recovery funds used for appraisal services and quality control reviews under the program are for costs that are reasonable, necessary, supported, and for services that comply with applicable	
2019-AT-1004-001-F	6/14/2019	requirements.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Establish and implement a written policy and procedures to recapture and reallocate	
2019-AT-1004-001-G	6/14/2019	unused NSP funds in a timely manner.	\$0
		Update the NSP program income information in HUD's grant tracking system and	
2019-KC-0002-001-C	6/25/2019	quarterly performance reports and reconcile with the Department's records.	\$0
		Establish and implement written procedures and provide adequate training to staff	
		associated with administering the NSP grant to help ensure accurate reporting of	
2019-PH-1003-001-B	8/2/2019	program income.	\$0
		Establish a method to provide information in the Do Not Pay system to PHAs and	
2019-AT-1005-001-A	8/9/2019	require its use.	\$0
		Implement controls to ensure that it maintains adequate documentation in the tenant	
		files to show that tenants were eligible for assistance and that the housing assistance	
2019-AT-1005-001-E	8/9/2019	payments were supported.	\$0
		Develop and implement a financial management system in accordance with HUD	
		requirements, including but not limited to permitting the disbursement of funds in a	
2019-AT-1005-002-B	8/9/2019	timely manner.	\$0
		Establish and implement adequate controls and procedures to permit proper	
		accountability for all CDBG funds to ensure that they are used solely for authorized	
2019-AT-1005-002-C	8/9/2019	purposes and properly safeguarded.	\$0
		Determine the amount spent for the resurfacing of the 16 private properties identified	
2019-PH-1004-001-B	8/14/2019	and reimburse the CDBG program from non-Federal funds.	\$0
		Establish and implement adequate policies and procedures, including project	
		inspection protocols, to ensure that CDBG funds are used for activities that meet a	
2019-PH-1004-001-C	8/14/2019	national objective, are used for eligible purposes, and are properly supported.	\$0
		We recommend that the Director of HUD's Baltimore Office of Public Housing direct the	
		Authority to develop and implement controls to ensure that it administers its waiting	
		list according to the requirements in its administrative plan, including maintaining	
2019-CH-1003-001-F	9/3/2019	documentation to show that it properly selected applicants from the waiting list.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of HUD's Baltimore Office of Public Housing direct the	
		Authority to develop and implement procedures to ensure that it maintains	
2019-CH-1003-001-H	9/3/2019	documentation to show that it admitted eligible families into the program.	\$0
		Ensure that third-party verifications, such as tax returns provided by the applicant, are	
2019-CH-1003-001-K	9/3/2019	from the source by obtaining certified tax returns from the Internal Revenue Service.	\$0
		Ensure that the management agent's staff is properly trained and familiar with HUD's	
2019-CH-1003-001-L	9/3/2019	and the project's requirements regarding housing assistance payments calculations.	\$0

68 \$6,660,743,216

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Support the eligibility of the \$1,965,990 in overhead allocations through the application	
		of a HUD-approved allocation plan (including offsetting the amount by applicable	
		reimbursements) or repay the Housing Choice Voucher Program from non-Federal	
2020-LA-1002-001-B	3/5/2020	funds.	\$1,965,990
		Request indemnification for the 7 of the 11 loans that had material underwriting	
		deficiencies (appendix D). The unpaid balance for these loans is \$1.3 million and the	
2020-LA-1005-001-A	9/3/2020	estimated potential loss to HUD is \$607,598.	\$607,598
		Submit supporting documentation showing that contracts and purchase orders	
		complied with Federal and its own procurement requirements and that these were	
		reasonable and necessary costs or cancel the \$361,501 in unpaid obligations related to	
2020-AT-1002-002-B	3/16/2020	CDBG-DR funds.	\$361,501
		Support the reasonableness of the \$340,701 Casterline contracts or repay the Housing	
		Choice Voucher Program any amount that cannot be supported using non-Federal	
2020-LA-1002-002-A	3/5/2020	funds.	\$340,701
		Provide the required documents to support \$161,131 in NSP1 and \$109,525 in NSP3	
		funds for expenses for acquisition, rehabilitation, and administration. If the City cannot	
		provide the required documents, it should repay the U.S. Treasury from non-Federal	
2021-LA-1001-002-A	10/27/2020	funds.	\$270,656
		Support that the Ability360 Mesa Home Accessibility activity for fiscal years 2015,	
		2016, and 2017 followed HUD requirements and its subrecipient agreement or repay its	
		program \$192,563 from non-Federal funds. This includes supporting that all activities	
		met the national objective requirements and were for rental properties, contracts were	
		properly procured, the 10 percent match subrecipient agreement requirement was met	
		(\$4,293) and properly accounted for, and contract expenses were adequately	
2020-LA-1003-001-H	4/13/2020	supported (\$228).	\$192,563
		Support the eligibility of the \$64,150 for accounting services charged to the Housing	
		Choice Voucher Program that applied to other Authority programs (including offsetting	
		the amount by applicable reimbursements) or repay the Program from the other	
2020-LA-1002-001-E	3/5/2020	applicable programs as appropriate or from non-Federal funds.	\$64,150

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Submit supporting documentation showing that contracts and purchase orders	
		complied with Federal and its own procurement requirements and that these were	
		reasonable and necessary costs or reimburse the CDBG-DR program \$55,010 from non-	
2020-AT-1002-002-A	3/16/2020	Federal funds.	\$55,010
		Determine the appropriate amount of general operating costs totaling \$2,544,266 that	
		applied to the Housing Choice Voucher Program in accordance with a HUD-approved	
		cost allocation plan (including offsetting the amount by applicable reimbursements)	
		and repay overcharges (estimated at \$50,947) to the Program from the other	
2020-LA-1002-001-C	3/5/2020	applicable programs as appropriate or from non-Federal funds.	\$50,947
		Support the reasonableness of the \$33,415 Genesis contract or repay any amount that	
2020-LA-1002-002-B	3/5/2020	cannot be supported from non-Federal funds.	\$33,415
		Support the eligibility of the \$25,827 in personnel expenses from SPC (including	
		offsetting the amount by applicable reimbursements) or repay its Housing Choice	
		Voucher Program from the other applicable programs as appropriate or from non-	
2020-LA-1002-001-D	3/5/2020	Federal funds.	\$25,827
		Repay the U.S. Treasury from non-Federal funds for the \$1,550 overpaid to acquire a	
2021-LA-1001-002-B	10/27/2020	foreclosed NSP3 property.	\$1,550
		Update HUD's loss mitigation policies, to include deadlines for the servicers to file the	
		FHA-HAMP nonincentivized partial claims, and consider imposing sanctions for	
2020-AT-0801-001-A	2/4/2020	noncompliance with these deadline requirements.	\$0
		Collaborate with OCFO to review methodologies used to produce grant accrual	
2020-FO-0003-001-O	2/7/2020	estimates, to include testing and verification of the resulting accrual estimates.	\$0
		Implement information security controls over the Section 108 loan guarantee database	
		that prevent and detect unauthorized changes to program data (or implement an	
		updated Section 108 loan guarantee database with information security controls that	
2020-FO-0003-003-A	2/7/2020	prevent and detect unauthorized changes to program data).	\$0
		We recommend that the Office of Multifamily Housing Programs develop contingency	
		policies and procedures to ensure that the properties it subsidizes receive adequate	
2020-FW-0001-001-C	2/26/2020	and verifiable continuous monitoring.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop and implement a financial management system for its 2008 CDBG-DR grant	
		and ensure that it tracks program funds to a level that supports compliance with HUD	
		requirements. At a minimum, the accounting system must reflect disbursements by	
		grant, activity, and activity type and properly account for assets, liabilities, and	
2020-AT-1002-001-C	3/16/2020	program income.	\$0
		Negotiate with Puerto Rico's Insurance Commissioner and with other CDBG-DR	
		grantees, within 30 days of the issuance of this audit report, to establish data-sharing	
		agreements for the 2017 CDBG-DR grant disaster, any open disaster recovery grants,	
2020-AT-1002-001-F	3/16/2020	and future disasters.	\$0
		Complete, within 30 days of the issuance of this audit report, the review for preventing	
		duplication of benefits associated with its 2008 CDBG-DR grant and pursue appropriate	
2020-AT-1002-001-G	3/16/2020	remedies for any instances of noncompliance found.	\$0
		Establish procurement policies and procedures for the 2008 CDBG-DR grant to ensure	
		compliance with 2 CFR 200.318-326, including but not limited to procedures to ensure	
		full and open competition, supporting independent cost estimates, properly	
		documenting the procurement history, and including required clauses in contracts,	
2020-AT-1002-001-J	3/16/2020	among other issues.	\$0
		Ensure that its staff appropriately determines exemptions from the Lead Safe Housing	
2020-CH-0003-001-A	3/18/2020	Rule and documents support of the determinations.	\$0
		Ensure 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	
2020-CH-0003-001-B	3/18/2020	take appropriate actions in accordance with its internal policies.	\$0
		Ensure that the 55 developments without sufficient support for an exemption either	
		support the exemption status or complete the required lead-based paint inspections	
2020-CH-0003-001-C	3/18/2020	and provide the documentation to the appropriate field office.	\$0
		Ensure that the remaining 24413 developments' exemption status is properly	
2020-CH-0003-001-D	3/18/2020	supported.	\$0
		Ensure that the 382 potentially noncompliant developments are reported in its	
		response tracking system and reviewed for compliance with the Lead Safe Housing	
2020-CH-0003-001-E	3/18/2020	Rule.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Implement adequate procedures and controls for monitoring public housing agencies'	
		compliance with the Lead Safe Housing Rule. Such procedures and controls should	
		include but not limited to establishing timeframes for reporting potentially	
		noncompliant developments in its tracking system and implementing corrective actions	
2020-CH-0003-001-F	3/18/2020	and resolution.	\$0
		Develop a framework for taking administrative actions against public housing agencies	
2020-CH-0003-001-G	3/18/2020	that do not comply with HUD's Lead Safe Rule.	\$0
2020-CH-0003-001-H	3/18/2020	Continue its efforts to identify and train staff on how to use the response tracker.	\$0
		Continue its efforts to resolve technical issues that prevented the addition of new cases	
2020-CH-0003-001-I	3/18/2020	into the response tracker.	\$0
		Establish policies, procedures, and controls for validating and correcting construction	
		dates of the public housing developments in IMS-PIC. If the information is determined	
		to be inaccurate, HUD should work with public housing agencies to update the data to	
2020-CH-0003-001-J	3/18/2020	ensure accuracy.	\$0
		Develop and implement an action plan that includes sufficient policies, procedures, and	
		controls that address households living in assisted units having a sufficient supply of	
		safe drinking water. Such policies, procedures, and controls should include but not be	
		limited to (1) developing and implementing internal procedures to be notified, and	
		share with public housing agencies, when the public water systems' water exceeds the	
		Environmental Protection Agency's lead action level and (2) revising HUD's applicable	
		regulations, providing guidance to public housing agencies and Housing Choice Voucher	
		Program landlords, and taking appropriate actions so that households living in assisted	
2020-CH-0004-001-A	8/21/2020	units have a sufficient supply of safe drinking water.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop and implement an action plan that includes sufficient policies, procedures, and	
		controls that address households living in multifamily housing units having a sufficient	
		supply of safe drinking water. Such policies, procedures, and controls should include	
		but not be limited to (1) developing and implementing internal procedures to be	
		notified, and share with the owners and management agents of the multifamily	
		housing properties, when the public water systems' water exceeds the Environmental	
		Protection Agency's lead action level and (2) revising HUD's applicable regulations,	
		providing guidance to the owners and management agents, and taking appropriate	
		actions so that households living in multifamily housing units have a sufficient supply	
2020-CH-0005-001-A	8/21/2020	of safe drinking water.	\$0
		Require the lender to develop and implement enhanced policies and procedures to	
2020-LA-1005-001-B	9/3/2020	ensure electronic signatures from borrowers are properly supported.	\$0
		Require the lender to fully implement its quality control plan with respect to	
		reverifications and provide HUD with periodic reports for 12 months to ensure that it	
2020-LA-1005-001-C	9/3/2020	conducts its quality control reviews in accordance with the requirements.	\$0
		Take appropriate actions to prioritize the need for resources necessary to ensure that	
		HUD fully implements the remaining four responsibilities as required by sections	
2020-LA-0002-001-A	9/24/2020	759(a)(1), 759(a)(2), 759(a)(4), and 759(a)(5) of the Geospatial Data Act of 2018.	\$0
		Implement its procurement controls to ensure that it is able to locate and maintain the	
		complete procurement documents for at least 3 years after the closeout of NSP1 and	
2021-LA-1001-001-A	10/27/2020	NSP3 in compliance with its own procedures and HUD regulations.	\$0
		Obtain technical assistance from HUD to ensure that it is able to manage the programs	
		and comply with program regulations before processing future expenses related to	
2021-LA-1001-002-C	10/27/2020	NSP1 and NSP3 projects and activities.	\$0
		Follow its NSP procedures and HUD regulations to complete and submit its future NSP1	
		and NSP3 HUD quarterly performance reports and annual single audit reports within	
		the required timeframes until the closeout of the respective programs or until HUD is	
2021-LA-1001-003-A	10/27/2020	assured that these reports are consistently submitted on time.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Follow its own procedures and HUD regulations to post the missing 21 NSP1 and 22	
		NSP3 HUD quarterly performance reports, as of June 30, 2019, on its official website;	
		and, post the future NSP1 and NSP3 HUD quarterly performance reports on its website	
		until the closeout of the respective programs or until HUD is assured that these reports	
2021-LA-1001-003-B	10/27/2020	are consistently posted on its website.	\$0
		Obtain technical assistance from HUD to ensure that the City is able to submit its	
		quarterly performance reports and annual single audit reports on time and post the	
2021-LA-1001-003-C	10/27/2020	performance reports on its website to comply with program regulations.	\$0
		Research the survey responses that resulted in a positive cash on hand balance to	
		determine whether a cash advance exists. If so, the Chief Financial Officer should	
		coordinate with CPD to (1) determine whether the grantees have proper	
		documentation and approvals allowing for cash advances and (2) develop and	
		implement procedures to estimate and account for cash advances for financial	
2021-FO-0003-001-E	12/4/2020	reporting purposes.	\$0
		Review all executed repayment agreements in HUD's Tenant Rental Assistance	
		Certification System (TRACS) to determine which repayment agreements have not been	
		fully repaid and represent an amount owed to HUD and work with OCFO to record	
2021-FO-0003-001-J	12/4/2020	these receivables.	\$0
		Include a field in TRACS to identify which repayment agreements represent an amount	
2021-FO-0003-001-K	12/4/2020	owed to HUD and implement controls to ensure the accuracy of the listing in TRACS.	\$0
		Develop and implement controls to track and enforce repayments owed to HUD to	
2021-FO-0003-001-L	12/4/2020	ensure that owners are not delinquent on their repayment agreements.	\$0
2021-DP-0001-001-A	12/17/2020	Not released to public.	\$0 \$0
2021-DP-0001-001-B	12/17/2020	Not released to public.	\$0
2021-DP-0001-002-A	12/17/2020	Not released to public.	\$0
2021-DP-0001-002-B	12/17/2020	Not released to public.	\$0
2021-DP-0001-002-C	12/17/2020	Not released to public.	\$0 \$0
2021-DP-0001-002-D	12/17/2020	Not released to public.	\$0
2021-DP-0001-002-E	12/17/2020	Not released to public.	\$0
2021-DP-0001-002-F	12/17/2020	Not released to public.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
2021-DP-0001-003-A	12/17/2020	Not released to public.	\$0
2021-DP-0001-003-B	12/17/2020	Not released to public.	\$0
		_	4

54 \$3,969,908

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Add to FHA databases the information necessary to ensure that the required flood	
		insurance is in place at loan origination, including flood zone, flood insurance type,	
		flood insurance amount, and site value of the property, and include system checks that	
		prevent endorsement of loans without the required flood insurance to put at least	
		\$432.6 million to better use by avoiding potential future costs to the FHA insurance	
2021-KC-0002-001-B	1/5/2021	fund.	\$432,637,444
		We recommend that the Director of HUD's Office of Community Planning and	
		Development require the City to provide documentation, including but not limited to	
		showing that it (1) notified and allowed a response from bidders regarding the bidding	
		and scoring processes; and (2) awarded home repair master agreement contracts	
		without restriction and were in line with the bid evaluation requirements, or provide a	
		documented re-evaluation of the procurement showing that it provided the best	
		advantage to it and HUD, thereby putting the remaining \$9,736,636 award amount to	
2021-FW-1002-001-A	6/21/2021	better use.	\$9,736,636
		Require lenders to provide evidence of sufficient flood insurance or execute	
		indemnification agreements for the 43 loans in our statistical sample that did not have	
		sufficient flood insurance at the time of our audit to put nearly \$5.2 million to better	
2021-KC-0002-001-A	1/5/2021	use.	\$5,198,090
		Provide documentation to support that program activities within NHSLA's interfund	
		were for eligible NSP2 activities or repay the program \$3,425,679 from non-Federal	
2021-LA-1002-001-A	1/5/2021	funds.	\$3,425,679
		Provide adequate documentation to support its administrative and project delivery	
2021-LA-1002-002-A	1/5/2021	cost expenditures or repay the program \$1,388,545 from non-Federal funds.	\$1,388,545
		We recommend that the Director of HUD's Office of Community Planning and	
		Development require the City to support \$1,063,364 or repay its CDBG-DR program	
		from non-Federal funds for payments made to one prequalified contractor under its	
2021-FW-1002-001-B	6/21/2021	home repair program without independent cost estimates and cost analyses.	\$1,063,364
		Support the reasonableness of the South Gate contract or repay NSP2 \$856,692 from	
2021-LA-1002-003-A	1/5/2021	non-Federal funds.	\$856,692

Number Report Date Recommendation Text Provide documentation to support that \$658,261 in loan proceeds was used for an eligible NSP2 activity or property or repay the program from non-Federal Return the outstanding balance of \$529,745 owed to NSP2. In addition, practice of depositing NSP2 funds in non-NSP2 accounts and making the 1/5/2021 be used or borrowed for non-NSP2 activities. Provide documentation to support that \$500,000 in NSP funds transferred revolving loan fund was used for an eligible NSP2 activity or property or	al funds. \$658,261 cease the em available to \$529,745 red to the
2021-LA-1002-001-C 1/5/2021 eligible NSP2 activity or property or repay the program from non-Federal Return the outstanding balance of \$529,745 owed to NSP2. In addition, practice of depositing NSP2 funds in non-NSP2 accounts and making the be used or borrowed for non-NSP2 activities. Provide documentation to support that \$500,000 in NSP funds transferror.	al funds. \$658,261 cease the em available to \$529,745 red to the r repay the
Return the outstanding balance of \$529,745 owed to NSP2. In addition, practice of depositing NSP2 funds in non-NSP2 accounts and making the 2021-LA-1002-001-B 1/5/2021 be used or borrowed for non-NSP2 activities. Provide documentation to support that \$500,000 in NSP funds transferred.	cease the em available to \$529,745 ed to the r repay the
practice of depositing NSP2 funds in non-NSP2 accounts and making the 2021-LA-1002-001-B 1/5/2021 be used or borrowed for non-NSP2 activities. Provide documentation to support that \$500,000 in NSP funds transferro	em available to \$529,745 red to the r repay the
2021-LA-1002-001-B 1/5/2021 be used or borrowed for non-NSP2 activities. Provide documentation to support that \$500,000 in NSP funds transferro	\$529,745 red to the r repay the
Provide documentation to support that \$500,000 in NSP funds transferred	red to the r repay the
	r repay the
revolving loan fund was used for an eligible NSP2 activity or property or	• •
	\$500,000
2021-LA-1002-001-D 1/5/2021 program from non-Federal funds.	
Provide supporting documentation to show whether the outstanding lia	bility of
\$324,478 is correctly classified as an NSP2 liability. If not, HUD should en	nsure that
NHSLA corrects its NSP2 cost reimbursement summary for the 12 month	ns ending June
30, 2018, to reclassify the expenses to a non-NSP2 program. Such funds	would be
2021-LA-1002-002-B 1/5/2021 considered funds to be put to better use.	\$324,478
We recommend that the Director of HUD's Office of Community Plannin	ng and
Development require the City to support \$170,066 or repay its CDBG-DR	₹ program from
non-Federal funds for payments made to the demolition contractor under	er its housing
2021-FW-1002-001-C 6/21/2021 buyout program without independent cost estimates and cost analyses.	\$170,066
We recommend that Director of the Houston Office of Public Housing re	quire the
Authority to support or repay \$31,327 to its low-rent operating fund fro	m non-Federal
2021-FW-1003-002-D 9/29/2021 funds for the various unsupported expenditures.	\$31,327
We recommend that the Director of HUD's Office of Community Plannin	ng and
Development require the City to support \$27,250 or repay its CDBG-DR	program from
non-Federal funds for payments made to three appraisal contractors und	der its housing
2021-FW-1002-001-D 6/21/2021 buyout program without cost analyses.	\$27,250
We recommend that the Director of HUD's Houston Office of Public Hou	ising require
the Authority to reimburse its Public Housing Operating Fund \$5,000 fro	om non-Federal
funds for the unrecovered remaining balance of the \$20,000 that was pa	aid to the
2021-FW-1003-001-A 9/29/2021 attorney.	\$5,000
We recommend that Director of the Houston Office of Public Housing re	equire the
Authority to Reimburse its low-rent operating fund \$2,172 from non-Fed	deral funds for
2021-FW-1003-002-A 9/29/2021 the ineligible travel, training, and credit card expenditures.	\$2,172

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that Director of the Houston Office of Public Housing require the	
		Authority to reimburse its Housing Choice Voucher Program fund \$704 from non-	
2021-FW-1003-002-C	9/29/2021	Federal funds for the ineligible travel and training expenditures.	\$704
		We recommend that Director of the Houston Office of Public Housing require the	
		Authority to support or repay \$584 to its Housing Choice Voucher Program fund from	
		non-Federal funds for the unsupported travel, training, and phone expenses paid with	
2021-FW-1003-002-E	9/29/2021	Housing Choice Voucher Program funds.	\$584
		Develop and implement sufficient financial procedures and controls to ensure that	
		program income is appropriately recorded and properly transferred to its NSP2	
2021-LA-1002-001-E	1/5/2021	account.	\$0
		Ensure it has sufficient staffing and capacity to administer the NSP2 program, including	
		obtaining training for its staff to understand HUD requirements and how to use the	
2021-LA-1002-001-F	1/5/2021	DRGR system.	\$0
2021-LA-1002-001-G	1/5/2021	Amend the NSP2 action plan to include its revolving loan fund.	\$0
		Adjust program income calculation methodology to ensure it is in accordance with HUD	
2021-LA-1002-001-H	1/5/2021	requirements.	\$0
		Submit overdue NSP2 quarterly reports to DRGR and update prior reports that did not	
2021-LA-1002-001-I	1/5/2021	accurately report program income activity.	\$0
		Develop and implement a HUD-approved cost allocation plan to properly account for	
2021-LA-1002-002-C	1/5/2021	indirect program costs.	\$0
		Establish written payroll policies and procedures in accordance with program	
		requirements for the tracking, recording, and maintenance of direct costs to ensure	
2021-LA-1002-002-D	1/5/2021	that time distribution records are in place to support the allocation of charges.	\$0
2021 LA 1002 002 B	1/3/2021	Obtain training to ensure that it understands NSP2 regulations and requirements	70
		related to payroll allocation for its administrative and project delivery costs and	
		program income calculation methodology to ensure it properly computes the amount it	
2021-LA-1002-002-E	1/5/2021	is allowed to charge for administrative costs.	\$0
	1,3,2021	Develop and implement additional procedures and controls to ensure that HUD	70
2021-LA-1002-003-B	1/5/2021	procurement requirements are followed.	\$0
	1,5,2021	F	٦

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Chief Financial Officer investigate the facts surrounding the	
		potential Antideficiency Act violation involving the \$7,787,675 in rent credits and make	
		a formal determination. If it is determined that a violation occurred, the Chief Financial	
		Officer should develop corrective action plans or internal process improvements as	
		necessary, take disciplinary actions as appropriate, and report the identified violations	
		to the oversight authorities including the HUD Secretary, the President, OMB, Congress	
2021-PH-0002-001-A	3/29/2021	and the Comptroller General.	\$0
		We recommend that HUD's Chief Administrative Officer implement the corrective	
		actions and internal process improvements in internal control developed as a result of	
2021-PH-0002-001-B	3/29/2021	the Chief Financial Officer's investigation addressed in recommendation 1A.	\$0
		We recommend that HUD's Chief Administrative Officer provide training to responsible	
		staff and officials to ensure that those that may be involved with negotiating any GSA	
		rent credits, like the credits addressed in this report, identify such potential rent credit	
		transactions and follow the corrective actions and process improvements implemented	
2021-PH-0002-001-C	3/29/2021	to resolve recommendation 1B.	\$0
		For the MF-RAP, PIH-TBRA, and CPD-HIM programs, ensure that the program improper	
		payments rate estimates adequately test for and include improper payments of Federal	
		funding that are made by State, local, and other organizations administering these	
		programs and adequately disclose any limitations imposed or encountered when	
		reporting on improper payments, to a degree that fairly informs users of the respective	
2021-AT-0002-001-A	5/17/2021	reported information.	\$0
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to provide its plan to continuously monitor Harris County's pace and	
		performance in its remaining Hurricane Harvey CDBG-DR program and take appropriate	
		action to ensure that program goals are met. The plan should include a process for	
		repurposing additional grant funds, if necessary, to avoid potential recapture due to	
		Harris County's inability to meet the expenditure deadline established under its	
		subrecipient agreement with the Texas GLO, and to allow the Texas GLO to meet the	
2021-FW-1001-001-A	6/2/2021	expenditure deadline for its grant award.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to set performance and financial milestones, including approval of Harris	
		County's projects and obligation and expenditure of funds, for all programs and	
		activities funded under the Harris County subrecipient agreement through the	
		remainder of the contract and deadlines for Harris County to achieve those milestones.	
		This would include the Texas GLO (1) providing its plan to continually assess whether	
		Harris County is meeting the established milestones within the prescribed time period;	
		(2) taking appropriate action as outlined in the subrecipient agreement for any missed	
		deadlines; and (3), if necessary, determining whether additional programs need to be	
2021-FW-1001-001-B	6/2/2021	combined or eliminated from the subrecipient agreement.	\$0
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to provide evidence of subrecipient monitoring of Harris County's capacity	
		to manage its Hurricane Harvey grant funds to address duplicative, inefficient, and cost-	
		prohibitive processes or positions. The evidence should include any corrective actions	
2021-FW-1001-001-C	6/2/2021	that have been imposed and Harris County's response.	\$0
		We was a many and that the Divertor of the Office of Disch Count Assistance very in the	
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to ensure that Harris County obtains adequate training for its program staff	
		and that the staff continuously demonstrates their understanding of and competence	
		to operate Harris County's programs within applicable requirements. This would	
		include ensuring that Harris County takes appropriate steps to remedy situations where	
2021-FW-1001-001-D	6/2/2021	staff are not operating the program within applicable requirements.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to review Harris County's Housing Reimbursement Program policies,	
		including assistance prioritization, to ensure compliance with the Texas GLO's action	
		plan and amendments. This would include the Texas GLO analyzing the County's	
		project pipeline to determine whether changes are warranted to ensure that those	
		most in need are prioritized to receive limited Federal assistance. The Texas GLO should	
		provide HUD with an analysis of the County's project pipeline within 90 days of its	
2021-FW-1001-001-E	6/2/2021	review to share the results and demonstrate compliance with its action plan.	\$0
		We recommend that the Director of HUD's Office of Community Planning and	
		Development require the City to develop and implement a HUD-approved written plan	
2021-FW-1002-001-E	6/21/2021	and checklists that will correct and prevent the deficiencies outlined in the finding.	\$0
		We recommend that the Director of HUD's Office of Community Planning and	
		Development require the City to provide training to City staff to ensure that it	
		understands and follows procurement requirements, such as performing independent	
		cost estimates, cost analysis, scoring, including all contract provisions, ensuring that	
		subrecipients understand and follow procurement requirements, and maintaining	
2021-FW-1002-001-F	6/21/2021	appropriate procurement documentation.	\$0
		We recommend that the Director of HUD's Office of Community Planning and	
		Development require the City to Update its procurement policies and procedures to	
2021-FW-1002-001-G	6/21/2021	ensure compliance with disaster assistance program requirements	\$0
		We recommend that the Director of HUD's Office of Community Planning and	
		Development require the City to ensure that monitoring includes a review of its	
		subrecipients' (1) policies and procedures to ensure that the policies and procedures	
		are current and comply with HUD requirements, (2) documentation supporting cost	
		reasonableness to ensure that the documentation is sufficient, and (3) training	
		provided regarding procurement and other program requirements to ensure that	
2021-FW-1002-001-H	6/21/2021	trainings are adequate.	\$0

Number Rep	port Dutc	Recommendation Text	Balance Due
		Establish and implement a process to ensure that The Office of Multifamily Housing	
		Programs' policies, procedures, and supervisory controls are effective. This process	
		should include addressing post disaster damage assessments, properly updating iREMS,	
		and executing loan forbearances. This process should also integrate with other HUD	
		program offices as appropriate to improve consistency with HUD's overall disaster	
2021-KC-0003-001-A	7/26/2021	response and to ensure the effectiveness of disaster controls.	\$0
		Establish and implement a process to ensure that the Office of Single Family Housing's	
		policies, procedures, and supervisory controls are effective. This process should	
		address the proper use, maintenance, and reporting of gathered information on	
		disaster-damaged properties as well as the proper assessment of properties with	
		appropriate disaster codes. This process should also integrate with other HUD program	
		offices as appropriate to improve consistency with HUD's overall disaster response and	
2021-KC-0003-002-A	7/26/2021	to ensure the effectiveness of disaster controls.	\$0
		Establish and implement a process to ensure that ONAP's policies and procedures are	
		effective. This process should address the identification of presidentially declared	
		disaster areas and the requirement to contact disaster-affected housing entities. This	
		process should also integrate with other HUD program offices as appropriate to	
		improve consistency with HUD's overall disaster response and to ensure the	
2021-KC-0003-004-A	7/26/2021	effectiveness of disaster controls.	\$0
		Develop a comprehensive process to ensure that complaints received by HUD's	
2021-KC-0004-001-A	7/28/2021	Multifamily Housing Clearinghouse are resolved in a timely manner.	\$0
		Develop agencywide policies and procedures for the intake, monitoring, and	
2021-KC-0004-001-B	7/28/2021	tracking of health and safety complaints.	\$0
		Develop an automated real-time system for HUD and PBCA staff to use to	
2021-KC-0004-001-C	7/28/2021	receive, track, and resolve health and safety issues.	\$0

Recommendation			
Number F	Report Date	Recommendation Text	Balance Due
		Revise the annual contributions contract to more clearly define the required treatment	
		of health and safety issues, to include:	
		•Specific timeliness requirements for resolving life-threatening and non-life-threatening	
		health and safety issues.	
		●Notification that HUD will actively monitor the status of complaints and become	
		involved in resolution if necessary.	
		•Requirement that PBCAs will immediately contact HUD staff if a property has a life-	
		threatening or non-life-threatening health and safety issue and report when the issue is resolved.	
		•Requirement that the projects' property management will immediately contact PBCA	
		staff if a property has a life-threatening or non-life-threatening health and safety issue	
2021-KC-0004-001-D	7/28/2021	and report when the issue is resolved.	\$0
		Establish and implement a plan for the unused and unfunded vouchers to mitigate or	
		prevent additional vouchers from becoming unused and unfunded. This plan should	
		include but not be limited to (1) implementing new or revising current regulations or	
		procedures to allow for the reallocation of voucher funding in coordination with the	
		Office of General Counsel; (2) working with interested parties, in particular the public	
		housing industry, to determine how to use the unfunded vouchers; and (3)	
		coordinating with HUD's Office of Policy Development and Research to determine	
		whether research is needed to assess the current need for additional low-income	
2021-CH-0001-001-B	9/15/2021	housing assistance in each jurisdiction.	\$0
		We also recommend that the Director of HUD's Houston Office of Public Housing	
		evaluate the reported actions the three commissioners took when procuring the legal	
		services contract and, if warranted, pursue administrative sanctions or other corrective	
2021-FW-1003-001-D	9/29/2021	actions.	\$0
		We recommend that Director of the Houston Office of Public Housing require the	
		Authority to update and implement its policies and procedures, including creating a	
		policy for recording expenses, a cost allocation plan, and a travel policy, to ensure that	
2021-FW-1003-002-F	9/29/2021	the Authority appropriately pays and accurately reports its costs.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of the Houston Office of Public Housing require the	
		Authority's new board to review the board minutes during our audit period, determine	
2021-FW-1003-003-B	9/29/2021	which board decisions were invalid, and take action to address the invalid decisions.	\$0
		We recommend that the Director of the Houston Office of Public Housing require the	
2021-FW-1003-003-C	9/29/2021	Authority's new board to revise its bylaws to agree with the Texas Open Meetings Act.	\$0
		Coordinate with CPD program staff to clarify the (1) roles and responsibilities of the	
		CRO, HCCRT, and CPD's risk management staff with regard to identifying, assessing,	
		and mitigating fraud risks and (2) purpose and role of HUD's ERM processes and	
		program office risk management processes with regard to identifying, assessing, and	
2022-FO-0801-001-A	10/12/2021	mitigating fraud risks.	\$0
		Complete a program-specific fraud risk assessment and risk profile for the CDBG and	
		ESG programs, with emphasis on CARES Act funding, and replicate this process to	
2022-FO-0801-001-B	10/12/2021	create program-specific fraud assessments and risk profiles for other CPD programs.	\$0
		Consider OIG's fraud risk inventory to improve CPD's own fraud risk assessments and	
2022-FO-0801-001-C	10/12/2021	develop a program-specific fraud risk map and compendium.	\$0
		Implement efforts to increase the awareness of fraud at all levels (headquarters, field	
		offices, grantees, subrecipients, etc.), including but not limited to regularly publishing	
		articles on known fraud schemes and identified instances of fraud in periodic	
		newsletters or on CPD's intranet website, providing recurring fraud risk trainings to	
		HUD employees and grantees and working with OIG to develop materials to support	
2022-FO-0801-001-D	10/12/2021	fraud awareness.	\$0
		Develop and implement a fraud risk checklist or other instrument as part of CPD's	
		monitoring oversight requirements, to be completed as part of each remote and onsite	
2022-FO-0801-001-E	10/12/2021	monitoring review.	\$0
		Develop and implement a fraud analytics strategy using available data, including but	
		not limited to data and information collected during the grantee risk assessment and	
		monitoring processes, to begin conducting data analyses to identify potential fraud	
2022-FO-0801-001-F	10/12/2021	risks for further review.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		As part of the validation process for CPD's accrued liabilities, improve its validation	
		process to ensure that it is based on verifiable grantees responses and supporting	
2022-FO-0004-001-A	12/9/2021	documentation.	\$0
		We are recommending OCFO reopen the following recommendation reported in audit	
		report 2021-FO-0003-0001-D:	
		1B. As part of the validation process for CPD's accrued grant liabilities, review CPD's	
		accrued grant liabilities estimation methodology to ensure that it is based on verifiable	
		grantee supporting documentation and all assumptions and variables used for the	
2022-FO-0004-001-B	12/9/2021	grant accrual estimate were properly established, supported, and documented.	\$0
		Establish controls to determine if single audits for HUD grantees are being completed	
2022-FO-0004-004-B	12/9/2021	and reported in a timely manner in accordance with 2 CFR §200.512.	\$0
		Establish controls to determine if follow-up is being conducted to determine if the grant recipients have taken appropriate and timely corrective action. That follow-up must include the following:	
		a. Issuing a management decision letter as prescribed in 2 CFR §200.521;	
		b. Monitoring recipients to ensure they are taking appropriate and timely corrective action;	
		c. Using cooperative audit resolution mechanisms (see 2 CFR §200.25) to improve	
		federal program outcomes through better audit resolution, follow-up, and corrective action; and	
		d. Developing a baseline, metrics, and targets to track, over time, the effectiveness of	
		HUD's process to follow-up on audit findings and on the effectiveness of single audits in	n l
2022-FO-0004-004-D	12/9/2021	improving recipient accountability and their use by HUD in making award decisions.	\$0
		Establish a control to hold HUD's Single Audit Accountable Official responsible for	
		improving the effectiveness of the single audit process based on single audit metrics	
2022-FO-0004-004-F	12/9/2021	that HUD will establish in response to recommendation 4D above.	\$0
		Request an opinion from HUD's Office of the Chief Financial Officer's Appropriation	
		Law Division on whether the abnormal balance in account 4901 constitutes a violation	
2022-FO-0003-001-A	12/9/2021	of the Antideficiency Act.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Enhance standard operating procedures around system and account reconciliations to	
2022-FO-0003-001-B	12/9/2021	ensure that they cover all possible scenarios and are easy to follow.	\$0
		Appropriately train and monitor new personnel to ensure that they understand and	
2022-FO-0003-001-C	12/9/2021	execute the procedures and controls.	\$0
		Update procedures to clearly define error thresholds that require follow-up and the	
		communication process for elevating errors to supervisors, managers, and senior	
2022-FO-0003-001-D	12/9/2021	leadership.	\$0
		Establish clear lines of communication within and between divisions to ensure that all	4.5
2022-FO-0003-001-E	12/9/2021	personnel become aware of issues that may impact their duties and responsibilities.	\$0
		Strengthen controls over the preparation of HECM-related reconciliations, reviews, and	
		oversight by ensuring that (1) program personnel preparing such reconciliations	
		understand how such reconciliations impact financial accounting and reporting and (2)	
		financial personnel sufficiently understand programs and systems to determine their	
2022-FO-0003-001-F	12/9/2021	general ledger impact.	\$0
		Enhance the quarterly variance analysis to identify the business reasons for changes in	
2022-FO-0003-001-G	12/9/2021	account balances and pay specific attention to abnormal balances and activity.	\$0
		Strengthen the financial statement review controls by completing a compliance matrix	
		to ensure all balances that are presented and disclosed reflect the most up-to-date	
2022-FO-0003-001-H	12/9/2021	financial accounting and reporting guidance.	\$0
		Perform a comprehensive analysis for all cohort years and assess the impact that the	
		use of the scheduled UPB instead of the current UPB has on the LGL. If significant based	
		on a quantitative threshold, update the SF cash flow model to incorporate the current	
2022-FO-0003-002-A	12/9/2021	UPB data.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop and implement a new process to require the annual validation of the fourth	
		quarter endorsement volume estimation method for the SF Forward model. The	
		process should include a management review and approval control component. The	
		process should be documented and should demonstrate that management's estimate is	
		based on the analysis of past experiences, current policy, and market considerations,	
2022-FO-0003-002-B	12/9/2021	and, if necessary, incorporate improvement recommendations.	\$0
		Perform a comprehensive review of the SF and HECM model documentation and	
		update the specific sections with the current practices and procedures required to	
2022-FO-0003-002-C	12/9/2021	execute the model activities.	\$0
		Establish a process that requires the timely review and update of model	
		documentation. The process should include tracking the dates and nature of the	
2022-FO-0003-002-D	12/9/2021	revisions.	\$0
		Provide training and periodic reminders to field staff and management to ensure that	
2022-FO-0003-002-E	12/9/2021	the data fields in DAP and on the final Form HUD-290 are accurate and consistent.	\$0
		Develop and implement written procedures that provide guidance or best practices	
		that should be followed to address data anomalies. At a minimum, these written	
		procedures should include the following: (1) a process for identifying key data	
		attributes that significantly impact the results, (2) the determination of preset	
		thresholds for analyst and management attention, (3) the treatment of data anomalies,	
		such as null values or values that exceed preset thresholds, (4) a process for providing	
		feedback to the upstream data provider(s) for corrective and preventive actions when	
		data integrity issues are detected and management concludes the issue is significant,	
2022-FO-0003-002-F	12/9/2021	and (5) a process for preparing documentation to support management decisions.	\$0
		We recommend that the Office of Single Family Housing coordinate its efforts with the	
		Office of Public and Indian Housing and the Office of Multifamily Housing Programs to	
		further ensure that appropriate controls are in place to prevent HECM borrowers from	
2022-PH-0801-001-A	12/10/2021	violating principal residency requirements.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Review the 21 loans with improperly administered forbearance to ensure that the	
		borrowers were remedied by the servicers, if possible, and ensure that these servicers	
2022-KC-0001-002-A	12/15/2021	updated their forbearance procedures to prevent future noncompliance.	\$0
		Ensure that the issues found during our audit are incorporated into QAD's servicing	
2022-KC-0001-002-B	12/15/2021	monitoring reviews.	\$0
		Provide additional guidance to the servicers so they will limit their communication and	
2022-KC-0001-002-C	12/15/2021	collection efforts for the borrowers in forbearance.	\$0

81 \$456,556,037

List of Open Recommendations to Present

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop a control to detect loans that did not maintain the required flood insurance to	
		put \$1.5 billion to better use by avoiding potential future costs to the FHA insurance	
2022-KC-0002-001-B	3/22/2022	fund from inadequately insured properties.	\$1,506,887,996
		Develop and implement policies and procedures to ensure that subgrantee agreements	
		are executed in a timely manner, effective monitoring is performed, and subgrantees	
		maintain an emphasis on using their CoC funds, thereby preventing similar occurrences	
2022-LA-1001-001-A	1/20/2022	of \$3.5 million (see appendix D) in CoC funding going unused.	\$3,500,000
		Support that \$2,870,374 paid for goods and services was reasonable in accordance with	
		applicable requirements or repay its Public Housing Operating Fund or Capital Fund	
		programs from non-Federal funds for any amount that it cannot support or that is not	
2022-NY-1002-002-A	3/30/2022	considered reasonable.	\$2,870,374
		Correct the reporting and use of proceeds received from the current lease, thereby	
		putting \$1,278,260 to better use. This requirement includes properly recording the	
		proceeds as restricted nonrental program income on its financial data schedule, placing	
		any unspent funds into an account subject to a general depository agreement until	
		spent, providing a detailed accounting of the use of the proceeds, reporting the use of	
		any proceeds used for demolition or other expenses in a revised 5-year annual plan,	
		and making any other updates needed to ensure that funds are properly recorded and	
2022-NY-1002-001-C	3/30/2022	used.	\$1,278,260
		Support that \$1,236,210 in funds not yet spent on the contracts reviewed, along with	
		any new procurements, would be reasonable or reallocate the funds to ensure that	
2022-NY-1002-002-B	3/30/2022	they will be put to their intended use	\$1,236,210
		Require lenders to provide evidence of sufficient flood insurance or execute	
		indemnification agreements for the 21 loans in our statistical sample that did not have	
		sufficient flood insurance at the time of our audit to put nearly \$1.1 million to better	
2022-KC-0002-001-A	3/22/2022	use. (See appendix A.)	\$1,090,636
		Adequately support the eligibility of payroll costs or repay its CoC grants \$824,302 from	
2022-LA-1001-002-A	1/20/2022	non-Federal funds.	\$824,302

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Provide support for the reimbursement to its housing program of \$107,036 from non-	
		Federal funds if justification cannot be provided to support that the overhead and	
2022-AT-1001-001-A	3/30/2022	profit amounts paid to the contractors were reasonable.	\$107,036
		Adequately support the eligibility of rent costs or repay its CoC grants \$55,545 from	
2022-LA-1001-002-B	1/20/2022	non-Federal funds.	\$55,545
		Revise its methodology to identify slow spenders, including appropriate baselines and	
2022-AT-0001-001-A	1/5/2022	the definition of slow spenders.	\$0
		Update 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	
2022-AT-0001-001-B	1/5/2022	delays with the grant, and documenting the outcome of its efforts.	\$0
		Establish a reasonable timeframe for grantees to resolve DRGR flags or at a minimum,	
		if a flag cannot be resolved within the established timeframe, have the grantee provide	
		a remediating comment explaining why the flag could not be resolved and a proposed	
2022-AT-0001-001-C	1/5/2022	timeline for resolution.	\$0
		Resolve or remediate outstanding flags for grants B-12-MT-01-0001, B-13-MS-36-0002,	
2022-AT-0001-001-D	1/5/2022	B-16-MH-48-0001, and B-16-DL-12-0001 in DRGR.	\$0
		Require updated projections for grants B-12-MT-01-0001, B-13-MS-36-0002, and B-16-	
		DL-12-0001 and provide assistance to the grantees to ensure that the expenditure	
2022-AT-0001-001-E	1/5/2022	deadlines will be met.	\$0
		Update its policies and procedures to require grantees to identify the reason for	
2022-AT-0001-001-F	1/5/2022	variances between the actual and projected expenditures to enhance CPD's oversight.	\$0
		Update monitoring exhibit 6-1 to include (1) reasons for differences between actual	
		and estimated projections and (2) a question to determine whether the grantee is	
2022-AT-0001-001-G	1/5/2022	meeting the timelines established and if the timelines are not met, providing reasons.	\$0
		Update policies and procedures to require CPD staff to sufficiently document its basis	
		for conclusions to meet the monitoring handbook and QPR checklist requirements and	
2022-AT-0001-001-H	1/5/2022	intentions.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Consider suggestions made by grantees to assist with the progress of spending funds	
		and provide support for the guidance it plans to share with grantees based on these	
		suggestions. (See bullets under Grantees Generally Considered CPD's Assistance With	
2022-AT-0001-001-I	1/5/2022	the Progress of Their Grants Helpful.)	\$0
		Develop and implement written policies and procedures and controls for the FHA	
		refund process to address the deficiencies identified in the audit report. These should	
		include (1) controls to ensure that the website for the public listing of all unpaid	
		refunds is complete, (2) controls to ensure that refund applications are sent only to the	
		homeowners who requested them, (3) controls to ensure that refund applications are	
		sent to all homeowners on the loan after loan termination, and (4) a formal monitoring	
2022-LA-0001-001-A	1/7/2022	framework for tracking the status of refunds.	\$0
		Develop and implement written policies and procedures (1) for locating homeowners	
		who have unpaid refunds (for both existing and new refunds), (2) to establish a	
		standard timeframe for mailing refund applications to homeowners after they are	
		requested, and (3) to establish requirements for verifying the termination date based	
2022-LA-0001-001-B	1/7/2022	on supporting documents provided by homeowners.	\$0
		Research, develop, and implement policies and procedures to reduce the number of	
		refunds that have remained unclaimed for an extended period, including consideration	
2022-LA-0001-001-C	1/7/2022	of a statute of limitations.	\$0
		Develop and implement written policies and procedures regarding the designation of	
2022-LA-0001-001-D	1/7/2022	legal representation for applicants.	\$0
		Obtain the required approvals under the Paperwork Reduction Act for the insert	
2022-LA-0001-001-E	1/7/2022	document mailed with the refund application and the Tracer Found Case form.	\$0
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to include milestones and appropriate consequences for not meeting those	
		milestones in future subrecipient agreements to ensure that expenditure deadlines	
		remain on track. Implementing this recommendation could assist the Texas GLO in	
		avoiding possible future litigation based on the lack of required benchmarks in its	
2022-FW-1001-001-A	1/4/2022	contracts.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that the Director of the Office of Block Grant Assistance require the	
		Texas GLO to provide its plan to ensure that processes are in place to assist those	
2022-FW-1001-001-B	1/4/2022	participants transitioning from the City's programs to the Texas GLO's programs.	\$0
		With HUD's approval of action plan amendment 8, we recommend that the Director of	
		the Office of Block Grant Assistance require the Texas GLO to provide its plan to	
		continuously monitor the City's pace and performance in its remaining Hurricane	
		Harvey CDBG-DR program and take appropriate action to ensure that program goals	
		are met. The plan should include a process for repurposing additional grant funds, if	
		necessary, to avoid potential recapture due to the City's inability to meet the	
	4/4/2022	expenditure deadline established under its subrecipient agreement with the Texas GLO	40
2022-FW-1001-001-C	1/4/2022	and to allow the Texas GLO to meet the expenditure deadline for its grant award.	\$0
		With HUD's approval of action plan amendment 8, we recommend that the Director of	
		the Office of Block Grant Assistance require the Texas GLO to set performance and	
		financial milestones, including approval of the City's projects and obligation and	
		expenditure of funds, for all programs and activities funded under the City's	
		subrecipient agreement through the remainder of the contract and deadlines for the	
		City to achieve those milestones. This requirement would include the Texas GLO's (1)	
		providing its plan to continually assess whether the City is meeting the established	
		milestones within the prescribed period; (2) taking appropriate action as outlined in	
		the subrecipient agreement for any missed deadlines; and (3) if necessary, determining	
		whether programs need to be combined or eliminated from the subrecipient	
2022-FW-1001-001-D	1/4/2022	agreement.	\$0
		With HUD's approval of action plan amendment 8, we recommend that the Director of	
		the Office of Block Grant Assistance require the Texas GLO to provide its plan to ensure	
		that the City will comply with the Texas GLO's program guidelines and required onsite	
		technical assistance and supportive services. This plan would include (1) precise	
		instructions and deadlines for submitting or resubmitting program and implementation	
		guidelines, (2) terms for settling technical assistance and supportive services	
		disagreements, and (3) appropriate consequences for noncompliance with the	
2022-FW-1001-001-E	1/4/2022	requirements the Texas GLO imposes.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Work with the Authority to determine whether the buildings represent an imminent	
		threat to public safety from physical deterioration and whether activities to control	
		the situation would be exempt under the Part 58 environmental review process or	
		excluded under the Part 50 environmental review process. If it qualifies, require the	
		Authority to immediately take actions necessary to control the imminent threat to	
2022-NY-1001-001-A	1/11/2022	public safety before the full environmental review is done.	\$0
		Determine whether it would be beneficial for HUD to conduct a Part 50 environmental	
		review of the development or if the Authority should conduct a Part 58 environmental review, and implement the decision to ensure that the environmental review is	
2022 NIV 4004 004 D	4 /44 /2022	1	Ć0
2022-NY-1001-001-B	1/11/2022	conducted as soon as possible as required under the action plan.	\$0
		Continue to provide training and technical assistance to ensure that the Authority	
	. / /	understands relevant requirements for the various asset repositioning options,	4.0
2022-NY-1001-001-C	1/11/2022	including milestone and disposition requirements.	\$0
		Provide certifications and supporting documentation to show that it has identified and	
		addressed urgent health and safety issues at the development, such as flooded	
2022-NY-1001-001-D	1/11/2022	stairwells, accessible crawlspaces, and unsecured windows and doors.	\$0
		Develop and implement a plan to routinely identify and address recurring urgent health	
		and safety issues such as flooded stairwells, accessible crawlspaces, and unsecured	
		windows and doors while the property remains vacant and throughout future asset	
2022-NY-1001-001-E	1/11/2022	repositioning efforts.	\$0
		Develop and implement a plan to use available asset repositioning options for the	
		remaining 284 public housing units at the Commodore Perry Homes development,	
2022-NY-1001-001-F	1/11/2022	including 274 dwelling units and 10 nondwelling units.	\$0
		Develop and implement a plan for the original property related to the 46 units	
		converted under the RAD transfer of assistance option to ensure that the property and	
2022-NY-1001-001-G	1/11/2022	proceeds from its disposition are used in accordance with requirements.	\$0
		If the Authority does not follow through on its asset repositioning plans, misses	
		deadlines, or it otherwise becomes clear that the plan is no longer feasible, work with	
		the HUD's Special Applications Center, Office of Recapitalization, and other offices as	
		appropriate, to consider and use available remedies such as revoking approval and	
2022-NY-1001-001-H	1/11/2022	enforcing required conversion.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Develop and implement strategies to address capacity and organizational problems or	
2022-LA-1001-001-B	1/20/2022	obtain technical assistance to address these issues.	\$0
		Develop and implement procedures and controls to clearly define and update point-of-	
2022-LA-1001-001-C	1/20/2022	contact staff for subgrantees.	\$0
		Work with HUD and subgrantees to reevaluate its CoC program's performance goals	
		and set targets that help to ensure that funds for future CoC grants are fully and	
2022-LA-1001-001-D	1/20/2022	effectively used to advance the goal of ending homelessness.	\$0
		Develop and implement additional written procedures and controls to ensure that	
		employees charge time in accordance with program requirements and that the	
		Authority fully documents and supports that salary and rental cost allocations are	
2022-LA-1001-002-C	1/20/2022	charged to its CoC grants in accordance with its cost allocation plan.	\$0
		Complete and implement policies and procedures to ensure that APRs are submitted by	
2022-LA-1001-003-A	1/20/2022	the closeout deadline.	\$0
		Develop and implement policies and procedures to ensure that relevant personnel are	
2022-LA-1001-003-B	1/20/2022	routinely and regularly trained on the grant closeout process.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Public Housing and Voucher	
		Programs update its compliance monitoring guidance to include a requirement for	
2022-BO-0001-001-A	2/7/2022	personnel to review PHAs reasonable accommodations policies and procedures.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Public Housing and Voucher	
		Programs update and consolidate requests for reasonable accommodation policies and	
		procedures to ensure that there is centralized guidance available for the field offices	
2022-BO-0001-001-B	2/7/2022	and PHAs.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Public Housing and Voucher	
		Programs conduct additional outreach efforts to educate tenants and PHAs on their	
		rights and responsibilities related to requests for reasonable accommodation, including	
		technical assistance, webinars, and external communications to inform PHAs about	
		their responsibilities and how to evaluate requests for reasonable accommodation, and	
2022-BO-0001-001-C	2/7/2022	help families understand their rights.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		We recommend that HUD's Deputy Assistant Secretary for Public Housing and Voucher	
		Programs require that PHAs track requests for reasonable accommodation, including	
		the date of the request, the type of request, and the disposition and date of any action	
2022-BO-0001-001-D	2/7/2022	taken that should be made available to HUD at its request.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Public Housing and Voucher	
		Programs review the joint agreement between HUD PIH and FHEO, including the	
		Section 504 checklist, and modify, update, or recommit to it to ensure that the role of	
		PIH and the responsibility for conducting civil rights front-end reviews is clearly	
2022-BO-0001-001-E	2/7/2022	defined.	\$0
		We recommend that HUD's Deputy Assistant Secretary for Public Housing and Voucher	
		Programs ensure that personnel receive training on how to conduct the civil rights	
		front-end reviews, including a review of PHAs reasonable accommodation policies and	
2022-BO-0001-001-F	2/7/2022	procedures.	\$0
		Ensure that future policies and guidance developed to return HUD's offices to normal	
		operations include the specific criteria, metrics, and defined geographic area to be used	
2022-CH-0002-001-A	2/15/2022	by all offices as applicable.	\$0
		Develop and implement sufficient naticies and controls to ensure that (1) applicable	
		Develop and implement sufficient policies and controls to ensure that (1) applicable	
		criteria in any future guidance are met and all safety measures are sufficiently	
	0/45/0000	completed before returning HUD's offices to normal operations and (2) sufficient	40
2022-CH-0002-001-B	2/15/2022	documentation is maintained to support that the applicable criteria were met.	\$0
		Develop and implement controls for use of the bulk grant closeout process going	
		forward to ensure that grants are closed in accordance with all applicable	
		requirements, including that administrative actions and required work under the grant	
		award have been completed by the grantee before the grant is closed out. These	
		controls should include but not be limited to increased collaboration and	
2022-NY-0001-001-A	3/9/2022	communication between headquarters and field offices.	\$0
		Develop and implement controls to ensure that future grant data reporting to	
		stakeholders is consistent and accurate, including defining how records should be	
		counted and data should be presented and ensuring that accurate POP dates are	
2022-NY-0001-002-A	3/9/2022	maintained in HUD's systems.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Consult with the Office of General Counsel to review the language in the statutes,	
		regulations, and handbooks and if warranted, make adjustments to the forward	
2022-KC-0002-001-C	3/22/2022	mortgage handbook to ensure consistency with the statute.	\$0
		Consult with the Office of General Counsel to review the language in the statutes,	
		regulations, and handbooks and if warranted, make adjustments to the HECM	
2022-KC-0002-001-D	3/22/2022	handbook to ensure consistency with the statute and regulation.	\$0
		Perform a review of the remaining 453 contracts and any additional contracts issued	
		under the old invitations to bid to ensure that overhead and profit amounts charged by	
		contractors were reasonable. The State should either provide justification or support	
		for the reimbursements to its housing program from non-Federal funds for the	
2022-AT-1001-001-B	3/30/2022	unsupported amounts.	\$0
		Update policies and procedures to ensure that a cost reasonableness assessment is	
		performed on all cost elements, including the overhead and profit percentages charged	
2022-AT-1001-001-C	3/30/2022	by contractors for future contracts.	\$0
		Develop and implement procedures to ensure the execution of newly developed	
		policies that require contractors that work on multiple programs to provide adequate	
		support to distinguish the proper amount of time and cost spent on each program. The	
		State should also be required to provide procedures that implement the policy	
2022-AT-1001-001-D	3/30/2022	changes.	\$0
		Train staff to ensure that expenditures, including payments made to contractors, are	
		classified to the proper project activity in the DRGR system and provide support for	
2022-AT-1001-001-E	3/30/2022	training conducted.	\$0
		Terminate the current lease and pay for any fees needed to terminate the lease from	
2022-NY-1002-001-A	3/30/2022	non-Federal funds.	\$0
		Execute and record the release of the current lease with the third party and ensure that	
2022-NY-1002-001-B	3/30/2022	the declaration of trust is returned to the first priority position.	\$0
		Repay from non-Federal funds any proceeds used for unallowable expenses identified	
2022-NY-1002-001-D	3/30/2022	in recommendation 1C.	\$0
		Submit a Section 18 application to obtain HUD approval of any proposed new lease	
		agreement prior to its execution, in compliance with the United States Housing Act of	
2022-NY-1002-001-E	3/30/2022	1937 and 24 CFR Part 970.	\$0

Recommendation			
Number	Report Date	Recommendation Text	Balance Due
		Improve controls over the proper execution and recording of all declaration of trust	
2022-NY-1002-001-F	3/30/2022	documents.	\$0
		Implement controls to ensure that it does not enter into future third-party agreements	
		unless the Authority follows applicable requirements in Notice PIH 2017-24 (HA), the	
		annual contributions contract, 24 CFR Part 970, and the United States Housing Act of	
2022-NY-1002-001-G	3/30/2022	1937.	\$0
		Implement controls to ensure that future disposition proceeds are properly accounted	
2022-NY-1002-001-H	3/30/2022	for and used only for planned, approved purposes.	\$0
		Place the Authority onto a zero threshold review process, requiring that all draws for	
		funds go through field office review until the Authority completes all actions needed to	
2022-NY-1002-001-I	3/30/2022	close recommendations 1A through 1H.	\$0
		Consider and take additional action if the Authority does not complete	
		recommendations 1A and 1B before submitting its next annual plan, including	
		withholding further awards for its program, conditioning future grant funds, and other	
		remedies that may be legally available until the Authority completes recommendations	
2022-NY-1002-001-J	3/30/2022	1A and 1B.	\$0
		Provide technical assistance to the Authority regarding the deficiencies identified with	
		the rooftop lease and related proceeds, and Federal requirements for property	
2022-NY-1002-001-K	3/30/2022	disposition.	\$0
		Review any ongoing time-and-materials contracts and if requirements were not	
		followed, remedy the noncompliance or reprocure the contracts to ensure compliance	
2022-NY-1002-002-C	3/30/2022	with HUD requirements.	\$0
		Ensure that all Authority staff members working with procurements and contract	
		administration receive procurement training on applicable requirements, including the	
		requirements related to cost reasonableness, contract types, the number of bids or	
		quotations, contract provisions, and maintaining documentation to show the history of	
2022-NY-1002-002-D	3/30/2022	procurements.	\$0
		Establish and implement adequate record-keeping procedures to comply with	
		applicable procurement requirements, including a register of all contracts with key	
		information and a checklist for each procurement action, to ensure that it completes	
2022-NY-1002-002-E	3/30/2022	required steps and receives all required documentation.	\$0
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