

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

# SEMIANNUAL REPORT TO CONGRESS

For the Period April 1, 2025, to September 30, 2025



— OFFICE of —  
**INSPECTOR GENERAL**

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UNITED STATES DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT



## Message from the *Acting Inspector General* Brian D. Harrison

I am honored to issue this Semiannual Report to Congress highlighting the excellent work of the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General (OIG) for the period of April 1, 2025, to September 30, 2025.

Pursuant to the Inspector General Act, we are broadly charged with the immense responsibility of conducting oversight of HUD programs and operations and reporting on this critical work. During the second half of fiscal year 2025, our audits resulted in approximately \$19.1 million in collections, identified approximately \$219.4 million in questioned costs, and recommended that

\$592,421 of taxpayer funds be put to better use. At the same time, our team operated a Hotline that received and reviewed 12,724 complaints, while our investigations yielded approximately \$17.1 million in recoveries and receivables, with approximately \$5.4 million returned to HUD programs. And, individuals were held accountable with our investigations producing 19 arrests; 28 indictments, informations, and criminal complaints; 33 convictions, pleas, and pretrial diversions; 24 civil actions; and 64 total administrative sanctions. Finally, we supported the DC Safe and Beautiful Task Force, the Memphis Safe Task Force, and the U.S. Department of Homeland Security's Immigration and Customs Enforcement.

As evidenced by this report, our team's oversight and enforcement work safeguarded millions of taxpayer dollars from fraud, waste, and abuse and resulted in recommendations to improve the efficiency and effectiveness of HUD programs. Still, there is so much more to be proud of that cannot be adequately captured in a summary report. I am humbled by the professionalism and resilience of a team fiercely dedicated to supporting the HUD mission; the teamwork, collaboration, and respectful clashing of ideas and opinions that lead to solutions for difficult problems; the early mornings, late nights, and travel away from home; and a team that makes a difficult job sometimes seem easy, and always rewarding.

We look forward to continuing to execute our mission and appreciate the ongoing support of Congress and HUD for our important work.

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Brian D. Harrison  
Acting Inspector General



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# Highlights



**\$592,421**

RECOMMENDED FUNDS PUT  
TO BETTER USE



**239**

TOTAL SUBPOENAS



**\$219,437,903**

QUESTIONED COSTS



**33**

CONVICTIONS PLEAS PRETRIAL  
DIVERSIONS



**\$19,199,085**

COLLECTIONS FROM AUDITS



**28**

INDICTMENTS,  
INFORMATIONS, AND  
CRIMINAL COMPLAINTS



**\$17,126,379**

TOTAL RECOVERIES AND  
RECEIVABLES



**24**

CIVIL ACTIONS



**\$5,486,821**

TOTAL RECOVERIES AND  
RECEIVABLES TO HUD  
PROGRAMS



**64**

TOTAL ADMINISTRATIVE  
SANCTIONS

# Profile of Performance

For the Period April 1, 2025, to September 30, 2025

<b>Audit results<sup>1</sup></b>	<b>This reporting period</b>	<b>Fiscal year 2025</b>
<b>Recommended funds put to better use</b>	<b>\$592,421</b>	<b>\$43,144,597</b>
<b>Questioned costs</b>	<b>\$219,437,903</b>	<b>\$227,586,882</b>
<b>Collections from audits</b>	<b>\$19,199,085</b>	<b>\$29,116,019</b>
<b>Nonmonetary and other benefits</b>	<b>135</b>	<b>418</b>
<b>Investigative results<sup>2</sup></b>	<b>This reporting period</b>	<b>Fiscal year 2025</b>
<b>Total recoveries and receivables</b>	<b>\$17,126,379</b>	<b>\$79,815,268</b>
<b>Total recoveries and receivables to HUD programs</b>	<b>\$5,486,821</b>	<b>\$18,094,078</b>
<b>Arrests</b>	<b>19</b>	<b>56</b>
<b>Indictments, informations, and criminal complaints</b>	<b>28</b>	<b>90</b>
<b>Convictions, pleas, and pretrial diversions</b>	<b>33</b>	<b>85</b>
<b>Civil actions</b>	<b>24</b>	<b>46</b>
<b>Total administrative sanctions</b>	<b>64</b>	<b>167</b>
Suspensions	22	48
Debarments	39	105
Administrative False Claims Act (Program Fraud Civil Remedies Act)	0	1
Program or professional license or certification	0	2
Evictions	1	4
Other <sup>3</sup>	2	7
<b>Search warrants</b>	<b>27</b>	<b>58</b>
<b>Subpoenas</b>	<b>239</b>	<b>429</b>
<b>Total administrative referrals</b>	<b>69</b>	<b>211</b>
Suspensions referred	23	52
Debarments referred	37	133
AFCAs (PFCRA) referred	0	1
Program professional license/certification referrals	1	11
Eviction referrals	1	2
Other referrals <sup>3</sup>	7	12

<sup>1</sup> During this semiannual reporting period, U.S. Department of Housing and Urban Development, Office of Inspector General (HUD OIG), audits did not result in administrative actions, civil actions, or personnel actions. Therefore, HUD OIG did not include those categories under audit results in this Profile of Performance.

<sup>2</sup> Delays can occur in recording investigative results during a semiannual reporting period. These figures were accurate as of November 20, 2025.

<sup>3</sup> This category includes employee-related actions (reprimands, suspensions, demotions, or terminations of employees of Federal, State, or local governments or of Federal contractors and grantees as the result of HUD OIG activities), limited denials of participation, and indemnifications.

## Making an Impact



The U.S. Department of Housing and Urban Development (HUD or the Department), Office of Inspector General (OIG) oversees HUD programs and operations to prevent and detect fraud, waste, abuse, and mismanagement while promoting efficiency, economy, and effectiveness. Using data-driven insights into the greatest risks in HUD programs, this oversight is carried out through criminal, civil, and administrative investigations, as well as audits, evaluations, and other reviews. HUD OIG's impact is evidenced by how our oversight increases integrity of HUD programs. Below are some of the key actions taken in this semiannual reporting period that are particularly noteworthy.

### **Integrated Oversight Supporting Washington, D.C. Safe and Beautiful Task Force**

In March 2025, by Executive Order, the President established the DC Safe and Beautiful Task Force to eradicate crime in Washington, D.C. through interagency coordination between federal, state, and local law enforcement. In an August 2025 supplemental Executive Order, the President expressly charged the Secretary of HUD with investigating "any non-compliance with the crime-prevention and safety requirements of HUD agreements by the District of Columbia Housing Authority or any landlord in the District of Columbia." Additionally, in September 2025, by Presidential Memorandum, the President established the Memphis Safe Task Force with the objective to "end street and violent crime in Memphis to the greatest extent possible."<sup>4</sup>

In furtherance of our mission to detect and deter fraud and abuse and to improve efficiency and effectiveness of HUD programs, and in compliance with the President's directives, HUD OIG has provided law enforcement and analytical resources to both task forces. In that capacity, HUD OIG has worked closely with task force members to help investigate fraud related to HUD programs and HUD-assisted properties and to ensure that individuals who commit crimes impacting HUD's programs and operations are held accountable for their actions. Also, HUD OIG initiated an audit of the DC Housing Authority (DCHA) to (1) determine whether DCHA complied with HUD's and its own requirements for verifying eligibility of individuals for HUD assisted housing based on criminal activity, citizenship, and immigration status; and (2) assess DCHA's practices for preventing and addressing criminal activity.

### **Status Update for New York City Housing Authority Bribery and Corruption Investigation**

As a result of a multi-year investigation led by HUD OIG, in conjunction with other law enforcement partners, 72 current and former employees of the New York City Housing Authority (NYCHA) were charged with bribery and extortion offenses related to accepting cash payments from contractors in exchange for awarding NYCHA contracts. As of this reporting period, of the 72 defendants, 66 had pleaded guilty, and 3 had been found guilty after trial by jury. This impactful work has received substantial press attention and sends a message to NYCHA employees, as well as public housing authority employees nationwide, that public corruption will be investigated and prosecuted.

<sup>4</sup> See [Restoring Law and Order in Memphis – The White House](#).



## U.S. Department of Housing and Urban Development, Office of Inspector General, Issues Priority Open Recommendations for Fiscal Year 2025

HUD OIG issued its Priority Open Recommendations report for fiscal year (FY) 2025 in April. The report highlights 31 open recommendations from HUD OIG reports that, if implemented, will help HUD address its most serious management challenges and enhance critical aspects of its operations.<sup>5</sup> The report also outlines important actions HUD leadership can take to prevent fraud, increase accountability over tens of billions of dollars in annual rental assistance program payments, promote the health and safety of families living in HUD-assisted housing, save billions of dollars by mitigating counterparty risk in HUD's mortgage insurance and mortgage-backed securities programs, and better modernize and secure the information technology (IT) systems that underpin HUD operations. HUD OIG tracks HUD's progress in addressing all recommendations, including those designated as priorities, on its [Recommendations Dashboard](#).

### READ MEMORANDUM

## Closure of Priority Recommendations

Each priority open recommendation that HUD closes has a significant beneficial impact that helps HUD achieve its mission and address its top management challenges. Below are four priority recommendations that HUD closed during this reporting period.

On **July 16, 2025**, HUD took action to close priority [recommendation 2A](#) from the HUD OIG Audit Report, *HUD Lacked Adequate Oversight of Multifamily Housing Properties With Failing REAC Scores or Life-Threatening Deficiencies*, issued February 13, 2024. HUD's Office of Multifamily Housing updated the language in the template that will be used in future notices of violation and default, clearly stating that owners are required to inspect all units (including vacant units), common areas, grounds, building systems, and sites as part of the owner survey. Additionally, the new template requires owners to include sufficient detail in the surveys to show (1) when the survey was conducted and (2) that the survey was a complete survey of the project. All Asset Management Division Directors were informed of the updates to the templates and instructed to use them. By taking these steps, HUD will improve its ability to hold property owners accountable for their responses to violations and defaults following failed Real Estate Assessment Center (REAC) inspections.

On **August 14, 2025**, HUD took action to close priority [recommendation 1A](#) from the HUD OIG Audit Report, *HUD Lacked Adequate Oversight of Multifamily Housing Properties With Failing REAC Scores or Life-Threatening Deficiencies*, issued February 13, 2024. HUD's Office of Multifamily Housing created procedures to identify failed inspections and notify the appropriate field office that a property in their portfolio had recently failed inspection. The procedures included a timeline for issuing a Notice of Violation/Notice of Default to the property owner. Implementation of this recommendation facilitates HUD notifying multifamily property owners of deficiencies in a timely manner and improves HUD's ability to hold them responsible for correcting them.

On **August 20, 2025**, HUD took corrective action to close priority [recommendation 8](#) from the HUD OIG Evaluation Report, *Fiscal Year 2021 Federal Information Security Modernization Act (FISMA) Evaluation Report*, issued February 17, 2022. HUD finalized its Supply Chain Risk Management (SCRM) policy, which utilizes a SCRM questionnaire to assess each vendor's supply chain risk and identify and prioritize risks accordingly. HUD's SCRM

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<sup>5</sup> Since this report was issued, 8 priority recommendations were closed. As of September 30, 2025, there are 23 remaining priority open recommendations.

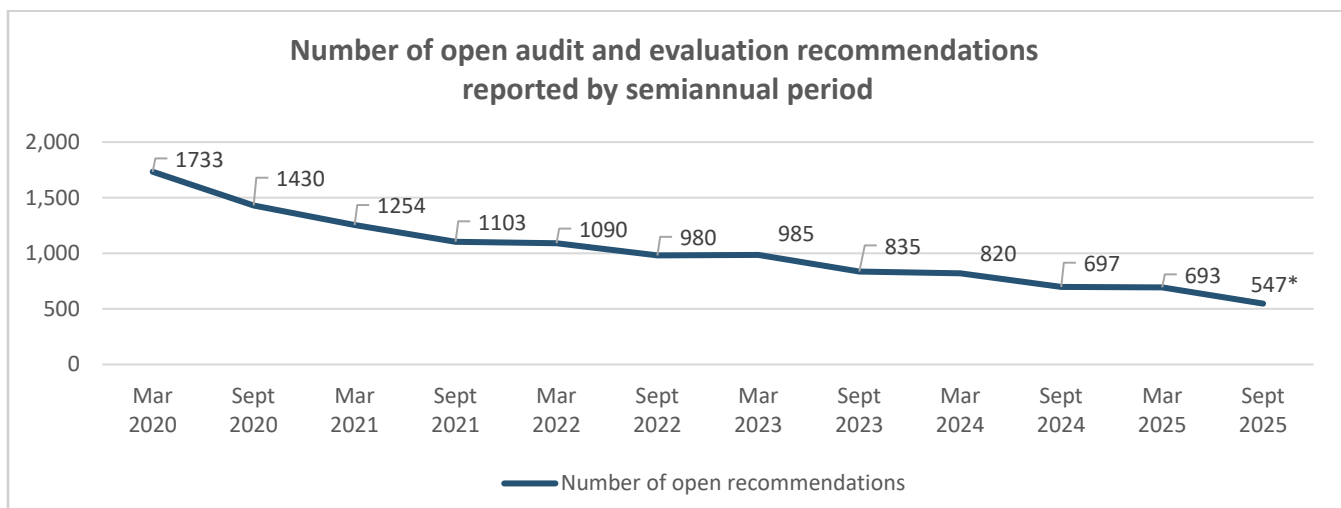
program team manages a supply chain risk register, which records prior and current vendors, and those that have undergone risk assessments to maintain visibility into its upstream suppliers and track changes over time. HUD also uses multiple tools, such as supply chain risk criteria, sourcing research, and market analysis, to evaluate vendors and strengthen protection of the supply chain during acquisition. By implementing these procedures, as well as having HUD’s program management team conduct annual and quarterly performance reviews for all vendors, HUD has improved how it ensures contractors are or not meeting their contractual obligations.

On **September 10, 2025**, HUD took action to close priority [recommendation 6](#) from the HUD OIG Evaluation Report, Improvements are Needed to HUD’s Processes for Monitoring Elevated Blood Lead Levels and Lead-Based Paint Hazards in Public Housing, issued February 28, 2023. HUD’s Office of Public and Indian Housing (PIH), Office of Field Operations (OFO), conducted research and comparative analysis to identify field offices and public housing authorities (PHAs) with unreported elevated blood lead levels (EBLL), obtain missing documentation, and enter it into OFO’s EBLL tracker. Additionally, OFO revised the EBLL tracker job aid, published new EBLL guidance, held office hours and group and individual trainings for its staff, and developed a Power BI dashboard to monitor EBLL cases with outstanding or near deadlines. These corrective actions have increased the EBLL tracker’s effectiveness.

### Resolution of HUD OIG Recommendations

HUD OIG audits and evaluations result in HUD and its program partners taking beneficial corrective actions to address recommendations made in those reports. HUD OIG collaborates closely with HUD to ensure corrective actions are focused, achieve intended results, and supports HUD's mission to ensure decent, safe, and sanitary housing for its beneficiaries, as well as reduce the risk of fraud, waste, and abuse. During this reporting period, HUD successfully resolved 214 open recommendations from previous HUD OIG audits and evaluations.

This collaborative effort has significantly reduced the total number of open HUD OIG recommendations. As of September 30, 2025, HUD had 547 open recommendations. The accompanying chart illustrates the downward trend in the number of open recommendations since 2019.



*\*Of 547 open recommendations, 483 are related to audit. The remaining recommendations are related to Evaluation reviews.*



### Other Benefits Tracking System

Along with monetary benefits, HUD OIG has developed a robust method to track the nonmonetary and other benefits of its reports and recommendations. HUD OIG has defined four types of nonmonetary benefits: (1) guidance enhancements (to prevent abuse), (2) process improvements (to reduce waste), (3) increased program effectiveness, and (4) enhanced accuracy. Specifically, HUD OIG uses an Other Benefits Review Board to ensure that all of its components are consistently tracking and reporting the nonmonetary and other benefits that result from HUD's implementation of policy, guidance, technical, or other changes to address HUD OIG report recommendations. HUD OIG is pleased to report the results for non-monetary recommendations assessed between April and September 2025. HUD OIG identified 135 nonmonetary benefits generated by closed HUD OIG recommendations: 27 guidance enhancements where HUD OIG work has resulted in new legislation, regulation, or HUD policies or procedures; 27 process improvements making HUD program or operational processes more efficient; 56 increased program effectiveness where action taken by HUD to address HUD OIG's findings and recommendations has generated better program execution assisting HUD in reaching its strategic goals or objectives; and 25 enhanced accuracies resulting in increased accountability, transparency, customer experience, or accuracy in HUD data or records. See the examples below.

Number of Other Benefits Identified	Other Benefit Category	Example
27	Guidance Enhancements	HUD updated its Single Family Housing Handbook 4000.1 as of April 25, 2025, to require its loan servicers to share information with borrowers regarding foreclosure moratoriums. We made this recommendation because we found that servicers could have better communicated the moratorium requirements to delinquent borrowers who were subject to foreclosure proceedings. The updated handbook requiring the servicers to better communicate with borrowers reflects a direct benefit of our oversight effort. <b>(HUD OIG Report, 2024-KC-0002, Rec 1A)</b>
27	Process Improvements	On May 13, 2025, HUD OIG closed a recommendation that advised HUD to review its information security training program to ensure it required general cybersecurity awareness training for external users of its systems and data. As a result of our work, HUD has updated its security training procedures and processes to establish and ensure completion of training requirements for external users. The establishment of a process for external users to obtain cybersecurity awareness training reflects a direct benefit of our oversight efforts. <b>(HUD OIG Report 2024-OE-0002, Rec 5)</b>
56	Increased Program Effectiveness	As of June 13, 2025, HUD has obtained timelines and updates for seven of the eight grantees we noted as having delayed project activities. For the last grantee, HUD has obtained an update and a completion date for the delayed project activities. HUD took these corrective actions in response to our oversight work in which we advised HUD to require its grantees that have delayed project activities to stay on schedule. Specifically, we recommended for HUD to require a detailed timeline and updates of when projects should be completed from the eight grantees in question. The timelines and updates obtained by HUD to ensure that grantees stay on schedule reflects a direct benefit of our oversight efforts. <b>(HUD OIG Report 2025-FW-0001, Rec 1C)</b>
25	Enhanced Accuracy	HUD has ensured that the reporting of program income has been corrected by one of its grantees as of July 24, 2025. HUD OIG made this recommendation because we found that the grantee had reported program income under the wrong activity ID in HUD's system. The reclassification of program income into the proper activity in the system reflects a direct benefit of our oversight effort. <b>(HUD OIG Report 2017-NY-0002, Rec 1F)</b>

## Oversight Focused on HUD's Top Management Challenges

Under the mandate of the Reports Consolidation Act of 2000, the U.S. Department of Housing and Urban Development (HUD or the Department), Office of Inspector General (OIG) reports what it determines to be the most critical management and performance issues confronting the Department. This report provides HUD OIG's independent view on the principal management challenges that HUD faced in fiscal year (FY) 2025.

This semiannual report presents selected oversight work performed in each of the [Top Management Challenges for FY 2025](#). HUD OIG identified the following eight top management challenges:

- Promoting health and safety in HUD-assisted housing
- Increasing access to affordable housing
- Mitigating counterparty risks
- Grants management
- Enhancing oversight of disaster recovery
- Managing fraud risk and improper payments
- Improving information technology (IT) modernization and cybersecurity
- Increasing effectiveness in procurement



## Promoting Health and Safety in HUD-Assisted Housing

HUD is responsible for ensuring that its assisted properties are decent, safe, sanitary, well-maintained, and comply with Department quality standards. The Department has made progress in its efforts to improve how it identifies, tracks, and eliminates health and safety hazards within these properties; however, several safety and health concerns remain unresolved. Related to this critical HUD responsibility is HUD OIG's investigation of sexual misconduct and other unsafe living conditions.



### Recent HUD OIG Reports

#### [HUD's Office of Public and Indian Housing Needs to Improve Its Oversight of Non-FHA-Insured PBV Projects Converted Under RAD](#)

HUD OIG conducted an audit to determine whether HUD had adequate oversight of the physical condition of the public housing units that converted to non-Federal Housing Administration-insured Project-Based Voucher (PBV) units under the Rental Assistance Demonstration (RAD) program. The audit found that HUD needs to improve its oversight of the physical condition of converted projects. Before implementing its PBV monitoring pilot program, HUD performed limited monitoring of RAD PBV projects. HUD also did not have a standardized process for monitoring those projects for compliance with its requirements. Additionally, for converted units that were public housing authority (PHA) owned, HUD did not consistently receive required housing quality standards inspection reports. These conditions occurred because HUD did not specifically target converted projects for review. It also did not have a system to collect and maintain information about the physical and financial condition of RAD PBV projects. Instead, HUD relied on contract administrators to oversee the converted projects. Additionally, HUD did not have a protocol or procedures for its field offices to follow to ensure that housing quality standards inspection reports for PHA-owned projects had been received and reviewed, as applicable, before HUD eliminated the requirement in June 2024. HUD OIG made 10 recommendations for the Office of Public and Indian Housing to improve data and document collection on reserve replacement accounts, enhance oversight of PBV contract administrators through better targeting reviews, improve monitoring procedures, and review the accounts HUD OIG found to be underfunded. (HUD OIG Report, 2025-CH-0002, Public and Indian Housing)

#### NEW AND ONGOING RELATED OVERSIGHT

[HUD's Implementation of the Timing of Inspections Under NSPIRE, announced April 2025](#)

[Physical Condition of HCV Units at a Public Housing Agency in Louisiana, announced June 2025](#)

[Monitoring of EBLLs by Property Owners in HUD-Assisted Multifamily Properties Receiving Section 8 PBRA, announced August 2025](#)

## NEW AND ONGOING RELATED OVERSIGHT

[A California's Public Housing Agency's Crime Prevention and Tenant Eligibility Determination, announced September 2025](#)

[A District of Columbia Housing Authority's Crime Prevention and Tenant Eligibility Determination, announced September 2025](#)

[An Illinois Public Housing Agency's Crime Prevention and Tenant Eligibility Determination, announced September 2025](#)

## HUD Should Better Track Elevated Blood Lead Levels in HUD-Assisted Multifamily Properties

HUD OIG evaluated the Office of Multifamily Housing Programs (Multifamily) to determine how it tracks elevated blood lead levels (EBLL) in HUD-assisted multifamily properties receiving Section 8 project-based rental assistance. Owners must comply with specific requirements following reports that a child under the age of 6 residing in an assisted unit has a confirmed EBLL, including (1) ensuring that an environmental investigation is conducted to determine the source of the lead poisoning, (2) timely remediating or abating the source of the lead poisoning, if applicable, and (3) notifying both Multifamily and the Office of Lead Hazard Control and Healthy Homes throughout the process. Such information must be received in a timely manner to ensure efficient and effective program administration and to monitor whether the owner has taken timely and appropriate steps to protect children who live in HUD-assisted multifamily housing. The evaluation found that Multifamily lacks an internal policy specifying how staff should oversee property owners' compliance with the Lead Safe Housing Rule requirements following a potential or confirmed EBLL. HUD received only two reports of EBLL from multifamily property owners during fiscal

years 2019 to 2024, and information in those reports in the Multifamily Property Management Information System was either nonexistent or limited in nature. HUD OIG recommends that Multifamily (1) develop and implement a policy that clearly defines roles and responsibilities for its office staff for EBLL-related requirements, including oversight of property owners' compliance with these requirements, and (2) establish processes to track reported EBLLs to easily identify the status of owners' remediation efforts for units that were the source of the confirmed EBLL. **(HUD OIG Report, 2025-OE-0801, Housing)**

## Recent Related Investigations

### Helena Real Estate Agent Convicted of Felony and Fined \$150,000 for Failing to Provide Lead-Based Paint Disclosures for Veterans Residing in Fort Harrison Rental Housing

On April 14, 2025, in Helena, MT, an owner and property manager of a 42-unit HUD Veterans Affairs Supportive Housing (VASH) project-based development and a hazardous material company were both sentenced in U.S. District Court for the District of Montana for knowing endangerment and False Claims Act conspiracy, respectively. The property manager failed to provide lead-based paint disclosures to veterans residing in the units, as required by the Lead Disclosure Rule. The Federal Government alleged that the property manager knew at the time that her failure to provide the required disclosures placed individuals in imminent danger by exposing them to significant lead levels. At the same time, the hazardous material company filed false requests to and received payments from the U.S. Department of Veterans Affairs for abatement of lead paint at the 42-unit HUD VASH project-based voucher development that they claimed was completed. The property manager was sentenced to 3 years of probation and ordered to pay a \$150,000 fine. The hazardous material company was sentenced to 2 years of probation and ordered to pay a \$50,000 fine and restitution in the amount of \$348,000. **(Press Release, USAO, District of Montana)**

### [Man Sentenced to 300 Months in Prison for Child Exploitation](#)

On July 7, 2025, in San Juan, PR, a social worker for a public housing management company was sentenced in U.S. District Court for the District of Puerto Rico for child exploitation. The defendant used his position from July 2021 to July 2023 to transport at least four minors with the intent to engage in criminal sexual activities and child pornography. The social worker was sentenced to 25 years in prison and ordered to register with the sex offender registry. **(Press Release, USAO, District of Puerto Rico)**



## Increasing Access to Affordable Housing

The nationwide shortage in affordable housing limits availability and increases the cost of housing for renters and buyers. Aging housing stock also leads to a decrease in available units and higher maintenance costs, which affects low-income and very low-income renters who are heavily reliant on HUD rental assistance programs.



### Recent HUD OIG Reports

#### NEW AND ONGOING RELATED OVERSIGHT

[Management of a California Federal Housing Administration \(FHA\)-Insured Multifamily Property, announced July 2025](#)

[Management of a Maryland Federal Housing Administration \(FHA\)-Insured Multifamily Property, announced July 2025](#)

[HUD's Inventory Management System/PIH Information Center \(IMS/PIC\) Fatal Errors- Housing Choice Voucher Program, announced July 2025](#)

#### [Public Housing Authorities and Source of Income Discrimination](#)

HUD OIG conducted an audit of HUD's Office of Public and Indian Housing's (PIH) Housing Choice Voucher Program (HCV) to assess PHAs' controls to prevent and combat source of income discrimination. PIH does not require PHAs to document source of income discrimination complaints, and PHAs are not responsible for investigating complaints of source of income discrimination. In the 16 states with a statewide source of income discrimination law that explicitly includes housing choice voucher holders, PHAs reported receiving few complaints, and most PHAs had guidance for staff and other processes to act on such complaints. Most PHAs did not have a method for documenting or recording the complaints they received, which PIH encourages as a way for PHAs to track complaints and monitor patterns of discrimination. PIH also encourages PHAs to (1) work with landlords to resolve complaints and (2) inform voucher holders of their right to file a complaint with the appropriate local fair housing organization if complaints are not resolved. The report contains no recommendations.

Prior to issuance of the Semiannual Report, HUD informed OIG that the audit no longer reflects the administration's policy priorities. **(HUD OIG**

**Report, 2025-BO-0003, Public and Indian Housing)**

### Recent Related Investigations

#### [Juniata County Woman Sentenced To Six Months' Home Confinement For Social Security And Housing Choice Voucher Program Fraud](#)

On May 22, 2025, in Juniata County, PA, a former Housing Choice Voucher Program participant was sentenced in U.S. District Court for the District of Pennsylvania for Social Security fraud and theft of public money related to her theft of Social Security and Federal housing funds. The defendant concealed her marriage and supplemental household income from a PHA to illegally obtain Federal housing and other Federal program benefits spanning approximately 10 years. The woman was sentenced to 36 months of probation and ordered to pay restitution of \$62,695.80. **(Press Release, USAO, Middle District of Pennsylvania)**

### Additional Investigative Press Releases

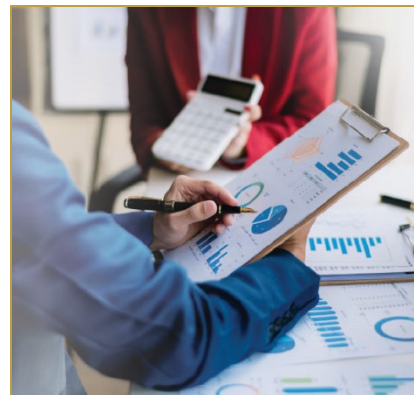
The press releases below on HUD OIG work demonstrate the types of misconduct that impact HUD's programs and the communities that rely on them.

- [Colombian National Charged With Voter Fraud, Federal Benefit Fraud; And Identity Theft Offenses](#)
- [South Bend Woman Convicted by Jury of Fraud](#)
- [Arizona Attorney General Announces Sentencing in Government Fraud Case](#)
- [Florida Man Sentenced to 6.5 Years in Prison for \\$5 Million Fraud Scheme Involving Western Pennsylvania Rental Properties](#)

## Mitigating Counterparty Risks

The FHA and the Government National Mortgage Association (Ginnie Mae) serve a pivotal role in fostering home ownership and enhancing access to affordable mortgage financing. HUD, in executing its mortgage insurance programs, relies on mortgage lenders, servicers, and other counterparties to provide loans to eligible borrowers and service properties in accordance with HUD's requirements.

HUD OIG oversight focused on identifying ways that HUD can improve oversight of and support to counterparties to manage risk and ensure that FHA and Ginnie Mae counterparties are following HUD requirements.



### Recent HUD OIG Reports

#### [HUD's Office of Single Family Housing Did Not Consistently Monitor Its Field Service Management Contractors' Property Preservation and Protection Services](#)

HUD OIG audited the Office of Single Family Housing's monitoring of the Field Service Management (FSM) contractors' property preservation and protection services and found that it did not consistently monitor its FSM contractors. HUD OIG's analysis of 34 of 79 statistically sampled records found discrepancies between HUD's assessment, the supporting documentation contractors submitted (e.g., potential date alteration on inspection photographs), and the criteria in the performance work statement under the contract. HUD did not develop a clear and uniform review framework to ensure effective monitoring of the FSM contractors' work. As a result, HUD could not ensure its current real estate-owned (REO) inventory of 2,628 active properties, as of March 2025, was being maintained in an adequate condition, and whether contracting actions are needed to address the deficient performance. The audit recommended the Office of Single Family Housing develop uniform processes for desk monitoring; update its monitoring plans and database to clearly define what is monitored; and to review required date stamps and photographs taken by inspectors. **(HUD OIG Report, 2025-KC-0002, Housing)**

#### [Flat Branch Mortgage, Inc. Did Not Have a Sufficient Quality Control Program for FHA-Insured Loans](#)

HUD OIG conducted an audit of Flat Branch's Quality Control (QC) program to evaluate its processes for originating and underwriting of FHA-insured loans. The audit found that Flat Branch's QC program for originating and underwriting FHA-insured loans was not sufficient. Specifically, Flat Branch: (1) did not select the proper number of loans for review and maintain complete and accurate data to document its loan selection process; (2) did not complete all loan reviews in a timely manner; (3) did not always complete key review steps and sometimes missed material deficiencies; and (4) did not adequately assess, mitigate, and report loan review findings, which included self-reporting loans to HUD when required. These issues occurred because Flat Branch had insufficient controls over its QC program, was not always familiar with HUD requirements, and experienced staffing constraints. As a result, HUD did not have assurance that Flat Branch's QC program fully achieved its intended purposes, which include, among other things, protecting the FHA insurance fund and lender from unacceptable risk, guarding against fraud, and ensuring timely and appropriate corrective action. HUD OIG recommended that HUD require Flat Branch to: (1) update its QC plan and related procedures to align with HUD requirements; (2) provide training to staff and management on HUD requirements for lender QC programs; (3) review the loans that it had not selected and take appropriate actions when applicable; (4) obtain credit reports



and reverifications of borrower information for QC reviews in which it did not complete these steps and evaluate the risk of findings identified for these loans; and (5) evaluate its QC files for the loans in which it

identified material findings to confirm whether it self-reported to HUD all findings of fraud or material misrepresentation, along with any other material findings that it did not acceptably mitigate. **(HUD OIG Report, 2025-NY-1003, Housing)**

## NEW AND ONGOING RELATED OVERSIGHT

[Audit of NSC Partial Claims Tracking and Collection, announced April 2025](#)

[Audit of FHA Claims Without Conveyance of Title Improper Payments, announced April 2025](#)

[HUD, Ginnie Mae, and FHA Inactive Obligations, announced May 2025](#)

[Federal Housing Administration-Insured Single Family Loans Issued to Deceased and Incarcerated Individuals, announced September 2025](#)

### [Neighborhood Loans, Inc. Did Not Have a Sufficient Quality Control Program for FHA-Insured Loans](#)

HUD OIG conducted an audit of Neighborhood Loans' Quality Control (QC) program to evaluate its originating and underwriting of FHA-insured loans. The audit found that Neighborhood Loans' QC program for originating and underwriting FHA-insured loans was not sufficient. Specifically, Neighborhood Loans: (1) did not select the proper number of loans for review and maintain complete data to document its loan selection process; (2) did not complete all loan reviews in a timely manner; (3) did not always complete key review steps and sometimes missed material deficiencies; and (4) did not adequately assess, mitigate, and report loan review findings, which included self-reporting loans to HUD when required. These issues occurred because Neighborhood Loans had insufficient controls over its QC program, was not always familiar with HUD requirements, and experienced staffing constraints. HUD OIG recommended that HUD require Neighborhood Loans to: (1) update its QC plan and related procedures to align with HUD requirements; (2) provide training to its staff and management on HUD requirements for lender QC programs; (3) review the loans that it had not selected and take appropriate actions when applicable; (4) review its QC files for loans in which it may not have performed complete reverifications and reverify information where appropriate; (5) evaluate its QC files for reviews in which it did not yet assess the risk of findings identified; and (6) evaluate its QC files for the loans in which it identified material findings to confirm whether it self-reported to HUD all findings of fraud or material misrepresentation, along with any other material findings that it did not acceptably mitigate. **(HUD OIG**

**Report, 2025-NY-1004, Housing)**

## Recent Related Investigations

### [Kissimmee Real Estate Broker Sentenced For Bank Fraud](#)

On April 30, 2025, in Orlando, FL, a realtor was sentenced in U.S. District Court for the Middle District of Florida for bank fraud. The defendant created fictitious pay stubs for companies as proof of employment verification, using the buyers' identification to deceive the mortgage company into approving fraudulent loans. Some of the paystubs the defendant created falsely represented that the borrower was employed by a company that her husband controlled. To further the scheme, the defendant's husband submitted false verification of employment documents in the names of buyers under the pretense that they worked for his business, although they did not. As a result, 20 FHA-insured mortgages were affected by this scheme, as well as 2 additional properties that were insured by another financial institution. The realtor was sentenced to 33 months in prison,

60 months supervised release, and ordered to pay a \$10,000 fine and \$103,337.87 in restitution. The overall investigation led to three defendants being cumulatively sentenced to 33 months in prison, 100 hours of community service, 60 months of probation, 96 months of supervised release, and ordered to pay \$30,000 in fines and \$103,337.87 in restitution. **(Press Release, USAO, Middle District of Florida)**

#### **Real Estate Investor, His Company, and an Employee Sentenced for Defrauding Financially Distressed Homeowners and Financial Institutions**

On June 9, 2025, in Providence, RI, a real estate investment firm, the company's owner, and an employee of the real estate investment firm were sentenced in U.S. District Court for the District of Rhode Island for defrauding financial institutions, the FHA, and homeowners. The defendants used a variety of short sale fraud schemes resulting in losses exceeding \$1 million, of which \$850,000 were losses to the FHA. The real estate investment firm, the company's owner, and an employee of the real estate investment firm were collectively sentenced to 12 months and 1 day in prison, 6 years of supervised release, 1 year of probation, and ordered to pay restitution of \$102,692. **(Press Release, USAO, Northern District of Rhode Island)**

#### **Hampton Woman Sentenced for \$161 Million Mortgage Fraud**

On April 11, 2025, in Atlanta, GA, an elementary school secretary and assistant bookkeeper was sentenced in U.S. District Court for the Northern District of Georgia for conspiracy. From August 2019 to January 2023, the defendant, in coordination with others, fabricated and submitted false financial documents—including bank statements, pay stubs, and IRS Forms W-2—to mortgage lenders for loan approval. The defendant produced fabricated documents for approximately 452 mortgage loans, including approximately 180 FHA-insured mortgages. Many of the FHA-insured loans remain in default, with partial claims paid by HUD totaling \$1,748,066. The elementary school secretary and assistant bookkeeper was sentenced to 26 months in prison and ordered to pay restitution of \$1,833,828.23, with \$1,748,000 due to the FHA. **(Press Release, USAO, Northern District of Georgia)** [Hampton Woman Pleads Guilty to \\$161 Million Mortgage Fraud Scheme](#)

#### **Additional Investigative Press Releases**

The press releases below on HUD OIG work demonstrate the types of misconduct that impact HUD's programs and the communities that rely on them.

- [Clermont Man Pleads Guilty To Conspiracy To Commit Bank Fraud](#)

## Grants Management

HUD's grant portfolio encompasses a wide array of programs, making it a primary source of flexible grant funding for communities to support broad economic and development activities. HUD is tasked with overseeing and managing more than \$100 billion in grant programs, involving thousands of grantees and an even larger number of subrecipients.



### Recent HUD OIG Reports

#### NEW AND ONGOING RELATED OVERSIGHT

[Audit of HOME and HOME ARP Grantee Draws Near Pause in Federal Funding, announced June 2025](#)

#### [A Review of Pandemic Relief Funding and How It Was Used In Six U.S. Communities: Jicarilla Apache Nation Reservation in New Mexico](#)

During this reporting period, HUD OIG issued the last report in a series of six reports taking an in-depth look at how six communities used pandemic funding they received to address a wide range of needs. This report focused on the Jicarilla Apache Nation Reservation in New Mexico with a detailed look at 6 of the 42 pandemic programs that provided funding to the community. This report was led by the Pandemic Relief Accountability Committee in coordination with HUD OIG as a project participant, as well as

other Federal OIGs.

### Recent Related Investigations

#### [Former Cleveland City Council Member Sentenced to Prison](#)

On April 1, 2025, in Cleveland, OH, a former city of Cleveland councilman was sentenced in U.S. District Court for the Northern District of Ohio for conspiracy to commit honest services fraud and wire fraud. The defendant conspired with his former partner and business owner to use his official position to induce individuals and organizations to transfer money to accounts controlled by his partner under the auspices of community improvement services. The defendant, acting in his official capacity, also facilitated relationships and real estate deals between local nonprofits and individuals. These transactions appeared to benefit the community when, in reality, the monies received from nonprofits and individuals went into accounts and businesses controlled by the defendant's partner, who secretly distributed the money to the former city councilman. The former city councilman was sentenced to 28 months in prison, 3 years of supervised release, and ordered to pay restitution of \$143,598.47. Subsequently, on July 28, 2025, the defendant's partner and business owner was sentenced to 3 years of probation and ordered to pay restitution of \$143,598.47 jointly and severally with the former city councilman. **(Press Release, USAO, Northern District of Ohio)**

#### [Kansas City Man Sentenced for Scheme to Defraud Local Financial Institution](#)

On April 16, 2025, in Kansas City, MO, a developer and contractor was sentenced in the U.S. District Court for the Western District of Missouri for bank fraud and money laundering. The defendant received funding through HUD's Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs for numerous projects, in addition to receiving reimbursement-based lines of credit to supplement his projects. The defendant made false statements to an FDIC-insured bank to secure reimbursements related to the lines of



credit. However, due to the defendant's criminal actions, many of the HUD-funded projects experienced delays, resulting in local governments terminating and assuming control of the projects in some cases. The defendant's fraudulent actions ultimately resulted in the FDIC-insured bank (Federal Deposit Insurance Corporation) suffering a loss of \$1,429,468.95. The developer and contractor were sentenced to 21 months in prison and ordered to pay a forfeiture of \$88,123.08 and restitution in the amount of \$231,841.84. **(Press Release, USAO, Northern District of Missouri)**

#### **Former Amarillo Employee Sentenced to 18 Months in Federal Prison for Embezzling HUD Program Funds**

On July 22, 2025, in Amarillo, TX, a former city of Amarillo employee was sentenced in U.S. District Court for the Northern District of Texas for embezzling CDBG and Emergency Solution Grants (ESG) funds by failing to disclose a conflict of interest. The defendant created fictitious landlords and submitted fraudulent applications to pay her own rent and the rent of relatives and friends. The former city employee was sentenced to 18 months in prison and ordered to pay restitution of \$121,325.21. **(Press Release, USAO, Northern District of Texas)**

#### **Additional Investigative Press Releases**

The press releases below on HUD OIG work demonstrate the types of misconduct that impact HUD's programs and the communities that rely on them.

- **Ohio Woman Sentenced for Role in Public Corruption Scheme**

## Enhancing Oversight of Disaster Recovery

HUD is tasked with administering billions in disaster recovery and mitigation grants annually to a diverse range of public grantees. These grantees often redistribute funds to subgrantees and other subrecipients to aid individuals and communities in recovering from or mitigating disaster damage.

### Recent HUD OIG Reports

#### [Disaster Recovery Biannual Report – October 2024 to March 2025](#)

This inaugural disaster recovery biannual report and subsequent reports will provide curated information regarding HUD and its grantees' use of the more than \$109 billion<sup>6</sup> in disaster recovery funds approved by Congress since the 2001 World Trade Center attack, as well as information on new or completed HUD OIG oversight work related to HUD's disaster recovery program. HUD's grantees use these essential funds to assist impacted communities and low- and moderate-income families in recovering from disasters and to mitigate damages from future disasters, including damage from water, wind, and fire. In our first report, we benchmarked disaster recovery funding, grantee spending, and spending by activity type to help stakeholders better understand HUD's disaster recovery portfolio. **(HUD OIG Report, 2025-FW-0003, Community Planning and Development)**

#### [New York State Can Improve Its Disaster Recovery Procurement Processes](#)

HUD OIG conducted an audit of New York State's Hurricane Sandy disaster procurement processes to determine whether the State conducted its Hurricane Sandy-funded disaster recovery procurements using full, fair, and open competition methods. HUD OIG found that New York State did not foster open competition and did not ensure that it obtained the best services at the best prices. Our testing found that the State used the Governor's waiver to explain why it did not follow its contracting requirements when it (1) allowed six contracts to extend beyond 5 years, (2) did not follow its mini bid process for two contracts, and (3) entered into four contracts with initial terms of more than 1 year. Although we agreed that a waiver of some specific requirements, like procurement requirements, might be needed immediately following a disaster, the State's continued use of a waiver of procurement processes 5 or more years after the storm did not appear to be reasonable or cost effective. The State's repeated use of the waiver led to numerous contract extensions that cost more than \$99 million and other contract changes that increased those contracts' costs by \$103 million. HUD OIG recommended that Community Planning and Development's Office of Disaster Recovery issue guidance to all disaster recovery grantees that waivers of requirements related to a disaster's impact should be for reasonable and limited time periods after a disaster occurs. Further, the State should revise its procurement policies and



### NEW AND ONGOING RELATED OVERSIGHT

[Assessment of the U.S. Virgin Islands Fraud Risk Management and Potential Improper Payments, announced April 2025](#)

<sup>6</sup> An additional \$1.95 billion (approximately) in disaster funding was appropriated prior to the 2001 World Trade Center attack.

procedures to improve and address the identified issues. **(HUD OIG Report, 2025-FW-1001, Community Planning and Development)**

## Recent Related Investigations

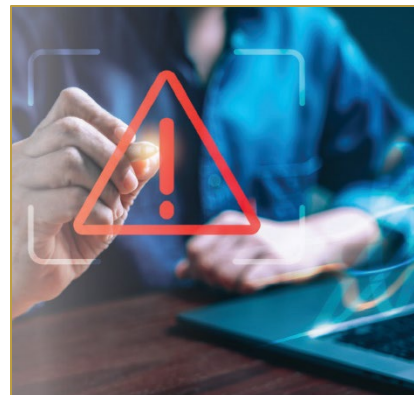
### [Mississippi Firm to Pay \\$1,207,600 to Resolve Disaster Recovery Claims](#)

On April 16, 2025, in Charleston, WV, a disaster recovery consultant entered into a settlement agreement with HUD and the United States to resolve allegations that it received improper payments in connection with HUD's Community Development Block Grant-Disaster Recovery (CDBG-DR) program. In 2018, the defendant received CDBG-DR funds to provide data and information to the State regarding its housing rehabilitation program following flood devastation that impacted the State. The defendant submitted an invoice to the State for various services it claimed to have performed for clients impacted by the flood. Many of the line items on the invoices were inflated, resulting in a loss to HUD of \$603,800. The disaster recovery consultant agreed to pay double damages to HUD of \$1,207,600. **(Press Release, USAO, Southern District of West Virginia)**



## Managing Fraud Risk and Improper Payments

Fraud and improper payments threaten the integrity of federal programs and erode public trust in government. Improper payments are payments that should not have been made or were made in incorrect amounts. Beyond the monetary loss to taxpayers, fraud against HUD programs diminishes the Department's capacity to address the critical housing needs of vulnerable communities. While all fraudulent payments are considered improper, not all improper payments result from fraud.



### Recent HUD OIG Reports

#### NEW AND ONGOING RELATED OVERSIGHT

[Improper Payment Estimate for HUD's Multifamily Project Based Rental Assistance \(MF-PBRA\) Program, announced July 2025](#)

[Management of a New York Section 8 Project-Based Rental Assisted Multifamily Property, announced August 2025](#)

[Federal Housing Administration-Insured Single Family Loans Issued to Deceased and Incarcerated Individuals, announced September 2025](#)

#### [HUD Did Not Comply With the Payment Integrity Information Act of 2019](#)

HUD OIG audited HUD's fiscal year 2024 compliance with the Payment Integrity Information Act of 2019 (PIIA) and HUD's efforts to prevent and reduce improper and unknown payments. For the eighth consecutive year, HUD did not comply with PIIA because it did not report compliant, improper, and unknown payment estimates for the Office of Public and Indian Housing's Tenant-Based Rental Assistance (PIH-TBRA) program and the Office of Multifamily Housing Programs' Project-Based Rental Assistance (MF-PBRA) program. These are HUD's two largest program expenditures in and totaled more than \$50 billion in fiscal year 2024. Consequently, HUD is unable to determine how much of this \$50 billion portfolio was paid improperly and is unable to implement corrective actions to mitigate the amount of actual or potential improper payments made in these two programs. In the 8 years reviewed, HUD's expenditures for these two programs were approximately \$315 billion. The lack of a detailed approach to resolve these systemic challenges, including coordination by leadership, has prevented HUD from making the progress needed to achieve compliance.

Additionally, HUD allowed the computer matching agreement between HUD and Treasury related to the Do Not Pay (DNP) initiative to expire in 2019 and it had not been renewed during the scope of our audit (fiscal year 2024).<sup>7</sup> While several program offices still used DNP to manually confirm eligibility prior to award, HUD did not confirm eligibility consistently or effectively for prepayment verification as required. This occurred largely because HUD's policy is outdated and does not establish roles, responsibilities, requirements, and implementation monitoring across HUD's program and support offices. As a result, HUD increased its risk of doing business with unregistered and excluded parties, and at least \$212 million of HUD payments were technically improper payments because they were made to 11 entities that did not have an active registration on SAM.gov. HUD OIG reiterated our priority open recommendation that the Deputy Secretary develop and

<sup>7</sup> Effective May 1, 2025, the Department entered into a Computer Matching Agreement with the Department of the Treasury.

execute a detailed plan and timeline to complete all the activities necessary to achieve testing and reporting within the required timeframes. HUD OIG also made three new recommendations to improve the Office of the Chief Financial Officer (OCFO) governance of DNP. Notably, the OIG designated our recommendation that OCFO update the Department DNP policy as a priority recommendation, to include defining responsibilities for preaward and prepayment verification and developing a process and governance structure to ensure that preaward and prepayment verification are consistently performed across HUD's programs. **(HUD OIG Report, 2025-FO-0006, Chief Financial Officer)**

 **READ PRESS RELEASE**

## Recent Related Investigations

### [American Falls Housing Authority Executive Director Sentenced for Embezzlement](#)

On April 14, 2025, in Pocatello, ID, a former PHA executive director was sentenced in U.S. District Court for the District of Idaho for federal program theft. The defendant admitted to making \$129,022.38 in unauthorized charges using the PHA's credit cards. The unauthorized charges included personal meals, airplane tickets, utilities for his home, medical expenses, and purchases at retailers. The defendant wrote fictitious checks to vendors and entered the checks into the PHA's internal accounting system to conceal his fraudulent behavior. The executive director was sentenced to 5 years of probation, of which 8 months would be served as home confinement, and ordered to pay restitution of \$129,022.38 to the PHA. **(Press Release, USAO, District of Idaho)**

### [Former NYCHA Superintendent Sentenced To One Year In Prison After Trial Conviction For Bribery And Extortion Offenses](#)

On May 28, 2025, a former assistant housing superintendent and superintendent at multiple NYCHA developments was sentenced for solicitation and receipt of a bribe by an agent of an organization receiving Federal funds and extortion under color of official right. From at least 2016 through at least 2022, the defendant demanded and accepted cash bribes from contractors in exchange for NYCHA contracts. He demanded that contractors pay approximately \$1,000 or between 10 and 20 percent of the contract value upfront to be awarded a contract and accepted bribe payments after the work was finished, when the contractor needed a signature to receive payment for the completed work. The defendant demanded and accepted at least \$27,000 in bribes in exchange for awarding no-bid contracts or approving payment for previously awarded contracts worth approximately \$175,000. The assistant housing superintendent and the superintendent were sentenced to 12 months in prison and ordered to pay restitution of \$32,000. During this reporting period, 8 defendants have been collectively sentenced to over 6 years in prison and ordered to pay more than \$273,000 in restitution. As of this reporting period, of the 72 individual NYCHA employees arrested and charged with bribery and extortion offenses, 66 had been convicted and collectively sentenced to over 45 years in prison and ordered to pay cumulative restitution of more than \$2 million. **(Press Release, USAO, Southern District of New York)**

### [Former Clermont Housing Official Pleads Guilty to Federal Program Theft](#)

On April 30, 2025, in Batavia, OH, a former PHA executive director was sentenced in U.S. District Court for the Southern District of Ohio for theft from a federal program. From 2016 through 2019, the defendant used HUD

funds to make personal purchases, which included a Polaris off-road vehicle, a Yeti cooler, and a drone. The defendant also conspired with a PHA contractor to perform work for his personal benefit and incorporated the fraudulent expenses into the PHA's invoices. The contracted work included the construction of a \$16,000 patio at the defendant's residence and a "man cave" for his use in a building owned by the PHA's non-profit entity. In addition, the defendant provided false documentation to HUD and a bank to secure over \$5 million in loans to purchase properties for the non-profit, using the PHA's assets to secure and maintain the loans without HUD's approval. The defendant purchased the properties to grow the non-profit, for which he received annual incentive bonuses. The executive director was sentenced to 4 months in prison, 180 days supervised release, 100 hours of community service, and ordered to pay restitution of \$86,929.76. Overall, the investigation led to two defendants being cumulatively sentenced to 4 months in prison, 200 hours of community service, 24 months of probation, 36 months of supervised release, and ordered to pay \$20,000 in fines and \$105,675.76 in restitution. **(Press Release, USAO, District of Ohio)**

### Additional Investigative Press Releases

The press releases below on HUD OIG work demonstrate the types of misconduct that impact HUD's programs and the communities that rely on them.

- [Former Dover Interfaith Mission for Housing Employees Plead Guilty to Stealing Federal Funds](#)
- [Former NYCHA Superintendent Sentenced To 18 Months In Prison After Trial Conviction For Bribery And Extortion Offenses](#)
- [Former Executive Director of Nonprofit Shelter Indicted for Embezzlement](#)

## Improving Information Technology Modernization and Cybersecurity

The efficiency and effectiveness of HUD's programs depend on its ability to modernize information technology (IT) systems to support emerging program office needs and protect systems and data from cybersecurity vulnerabilities.

### Recent HUD OIG Reports

#### Fiscal Year 2025 Federal Information Security Modernization Act (CyberScope)

The Federal Information Security Modernization Act of 2014 (FISMA) requires each Office of Inspector General to conduct an annual evaluation to determine the effectiveness of the information security (InfoSec) program and practices of its respective agency. FISMA requires an assessment of the Department's compliance with Federal and Office of Management and Budget (OMB) reporting requirements using a maturity model focusing on OMB-designated "core metrics." In July, HUD OIG provided its technical assessment results to the Department of Homeland Security's CyberScope Reporting Tool. Overall, HUD continued to mature its InfoSec program in FY 2025. HUD maintained its overall maturity at level 3, consistently implemented, improved in maturity in 4 core metrics, decreased in maturity in 1 core metric, and maintained its maturity for the other 15 core metrics. In addition, HUD achieved maturity level 3, consistently implemented, for 4 of the new supplemental metrics, and maturity level 2, defined, for the 1 other supplemental metric. HUD scored 3.13 in the 20 core metrics and 2.67 in the 5 supplemental metrics. HUD OIG's FY 2025 FISMA evaluation is ongoing and will result in a publicly available evaluation report.



### NEW AND ONGOING RELATED OVERSIGHT

[HUD IT Access Controls, announced August 2025](#)

## Whistleblower Protection

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

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

The chart below provides further information on Section 4712 whistleblower retaliation complaints received by HUD OIG during the period covered by this report.

Number of complaints alleging whistleblower retaliation	63
Complaints meeting threshold requirements for initial inquiry and/or full investigation	30

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

On May 31, 2023, HUD OIG issued [Management Alert \(2023-IG-002\)](#) identifying a substantial gap in whistleblower protections for thousands of employees who work under contracts that predate Section 4712, the 2013 antiretaliation statute that safeguards individuals from retaliation who make protected disclosures. In the management alert, HUD OIG made five recommendations to HUD to take steps to ensure that contractor employees who make disclosures of wrongdoing are protected from retaliation. HUD OIG designated three of the five recommendations as priorities. As of January 2025, HUD provided HUD OIG with a management plan that identifies actions the Department is taking to address HUD OIG’s open recommendations. HUD OIG and HUD have not reached an agreement that the proposed actions will fully address the recommendations. Additionally, HUD has not completed several of the proposed actions and is still collecting information that responds to the recommendations.

HUD OIG continues to investigate complaints of whistleblower retaliation, including those related to contracts that predate the 2013 antiretaliation statute.

Alongside HUD OIG’s investigative role, the HUD OIG Whistleblower Protection Coordinator also assists covered employees by providing training and information related to:

- Options for disclosing misconduct, waste, or abuse in HUD programs;
- Statutory protections for employees who make such disclosures; and

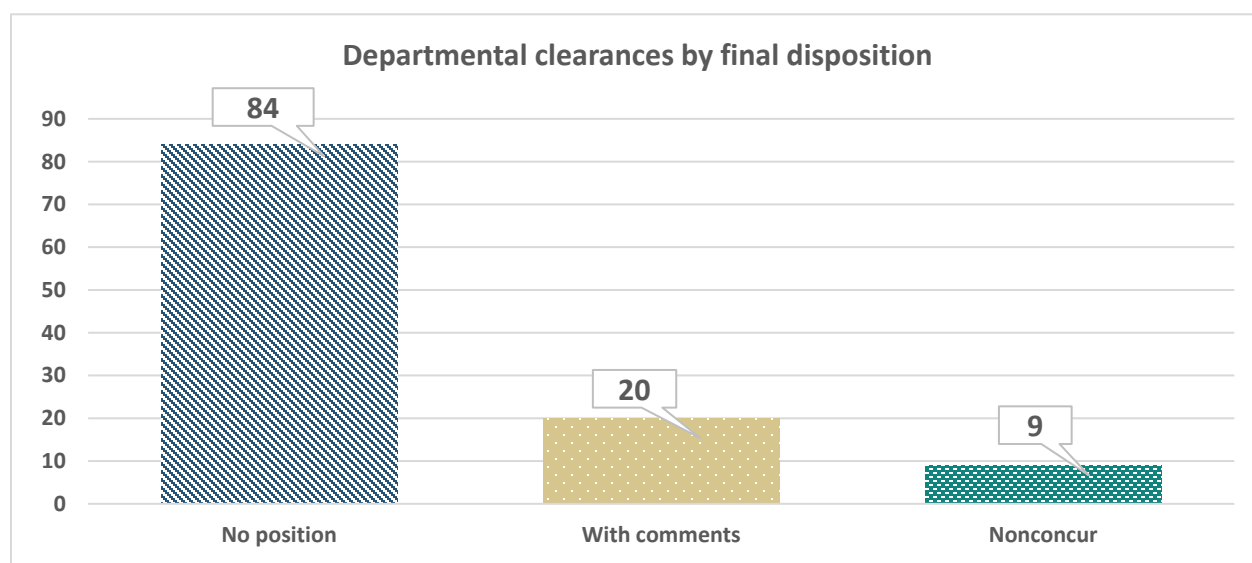


- The process for filing a complaint when an employee believes he or she has been retaliated against for making protected disclosures.

HUD OIG has mandatory whistleblower training for HUD OIG personnel that is provided using an interactive, virtual class about whistleblower rights and protections, how to make protected disclosures, and how to report wrongdoing. The Whistleblower Protection Coordinator can be contacted via email at [whistleblower@hudoig.gov](mailto:whistleblower@hudoig.gov).

## Legislation, Regulations, and Other Directives

Pursuant to its responsibilities under the Inspector General Act of 1978, as amended, the HUD OIG reviews proposed legislation and regulations concerning their impact on the economy and efficiency of HUD programs and the prevention and detection of fraud and abuse in HUD programs and operations. During this six-month reporting period, HUD OIG reviewed 113 issuances. HUD OIG provided comments on 20 (18 percent) of the issuances and nonconcurred on 9 (nine percent). The draft directives consisted of 74 notices, 9 mortgagee letters, and 30 other directives. Of the 30 other directives, HUD OIG reviewed 4 handbooks-guidebooks, one proposed rule, one research report, 13 congressional reports, and 11 other directives.



### Legislation

#### Permanent Authorization of the Community Development Block Grant Disaster Recovery Program

Unique for a program of similar size and scope, HUD's Community Development Block Grant Disaster Recovery (CDBG-DR) programs are not enacted through regulatory requirements in the Code of Federal Regulations. Instead, Congress provides disaster relief funds in supplemental appropriations, and HUD uses the existing CDBG program as an initial program framework. However, for each appropriation, HUD must issue one or more Federal Register notices with additional requirements, waivers, and allocations for its CDBG-DR grantees. As HUD allocates and amends requirements for each disaster through Federal Register notices, grantees have had to develop multiple action plans or amendments, often through synthesizing many notices with different requirements to implement disaster recovery plans, adding to the time it takes to get funding into the hands of those affected by the disaster. HUD OIG and the U.S. Government Accountability Office have issued multiple oversight reports with recommendations to ensure that HUD's CDBG-DR funding reaches vulnerable communities quickly, including that HUD seek permanent authorization of the CDBG-DR program through legislative action.

HUD has consistently maintained that it does not have the statutory authority to codify the CDBG-DR program through the regulatory process. In January 2025, HUD published a Universal Notice that is meant to provide

consistent guidance. HUD has also taken consistent, meaningful steps to address HUD OIG’s recommendations to pursue permanent authorization through legislative action. Secretary Turner, former Secretary Fudge, and former Secretary Carson all expressed support for permanent authorization in Congressional testimony.

In successive legislative years, bipartisan, bicameral congressional support for permanent authorization has resulted in bills, such as the House and Senate versions of The Reforming Disaster Recovery Act and the Road to Housing Act of 2025, that are responsive to HUD OIG’s recommendations. Permanently authorizing the CDBG-DR program would streamline, reform, and inject greater fiscal responsibility into the program; mitigate funding lags and duplicative requirements; and ultimately help HUD achieve its mission.

### **Legislation Addressing Critical Gaps in HUD Whistleblower Protections**

To address the gap in whistleblower protection for employees of thousands of contractors who receive HUD funding, [OIG recommended](#) that HUD seek legislative authority to expeditiously include 41 U.S.C. 4712 protections within contracts for which HUD believes it must otherwise wait until there is a major modification. The President’s fiscal year 2026 Congressional Budget Justification requests new legal authority to protect whistleblowers by addressing this critical gap, which would also be addressed through bipartisan legislation introduced in the Senate and House of Representatives during the 119<sup>th</sup> Congress: [Section 237](#) of S. 2465, “a bill making appropriations for the Department of Transportation, and Housing and Urban Development, and related agencies for the fiscal year ending September 30, 2026”, and [H.R. 4646](#), the “Whistleblower Protection Act of 2025”.

### **Notices and Other Directives**

#### Warnings and Certifications

HUD OIG regularly makes recommendations to HUD to include standard warnings and certifications in its policies and forms to protect HUD’s programs from fraud. Clear warnings on HUD documents put fraudsters on notice that there can be serious criminal, civil, and administrative consequences to their actions. During the reporting period, HUD OIG nonconcurred on seven clearances due to insufficient warnings and certification language. HUD OIG’s recommended language is:

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

Computer Matching Agreement with the Department of the Treasury, Do Not Pay Business Center - Effective May 1, 2025, the Department entered into a Computer Matching Agreement with the Department of the Treasury, Bureau of the Fiscal Service, Do Not Pay Business Center, to establish the conditions, safeguards, and procedures under which HUD will conduct a matching program to provide identifying information through Treasury’s Working System. The information will be used by HUD to detect suspected instances of programmatic fraud, waste, and abuse and unsupported payments in Federal benefit programs administered by HUD in its Office of Housing, Multifamily, and the Office of Public and Indian Housing.

Dear Lender Letter, 2025-05, Revisions to the Residency Requirements - The Office of Native American Programs is updating its residency requirements found in the Section 184 and Section 184A Processing Guidelines. This update aligns ONAP requirements with recent executive actions that emphasize the prioritization of Federal resources to protect the financial interests of American citizens and ensure the integrity of government-guaranteed loan programs. This update also aligns with the Federal Housing Administration's recent revisions to its residency requirements as announced in a Mortgagee Letter.

Grant Recipient Financial Reporting Demonstration - On September 4, 2025, HUD published in the Federal Register a notice informing the public and soliciting comments on a proposed demonstration of a financial portal in accordance with section 470 of the Housing and Urban-Rural Recovery Act of 1983 (42 U.S.C. 3542). The demonstration is designed to increase understanding of how enhanced recipient reporting can help reduce the risk of fraud, waste, and abuse across grant programs. The demonstration will focus on testing HUD's design for a reporting portal to collect and analyze supporting financial evidence from recipients, including subrecipient information. Approximately nine voluntary participants from three HUD grant programs will be included in this demonstration. HUD will refine the portal based on recommendations from participants. Public comments were due on November 3, 2025.

# Peer Review

The Dodd-Frank Wall Street Reform and Consumer Protection Act (Public Law No. 111-203), section 989C, requires Inspectors General to report the latest peer review results in their semiannual reports to Congress. The U.S. Department of Housing and Urban Development, Office of Inspector General’s (HUD OIG) Offices of Audit, Evaluation, and Investigation are required to undergo a peer review every three years to ensure that the work completed by the respective organizations meets the applicable requirements and standards.

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

**Table 1. Peer reviews conducted on HUD OIG**

Type of review	Date of peer review	Reviewing OIG	Rating	Outstanding recommendations
Audit	September 30, 2024	DOT* OIG	Pass	None
Evaluation	March 28, 2023	DHS** OIG	In compliance	None
Investigation	October 14, 2022	SSA*** OIG	Pass	None

**Table 2. Peer reviews conducted by HUD OIG**

Type of review	Date of peer review	Reviewed OIG	Rating	Outstanding recommendations
Audit	June 17, 2025	SSA OIG	Pass	None
Evaluation	March 28, 2025	DoD**** OIG	Pass	None
Investigation	June 5, 2020	DHS OIG	Pass	None

\* U.S. Department of Transportation  
 \*\* U.S. Department of Homeland Security  
 \*\*\* Social Security Administration  
 \*\*\*\* U.S. Department of Defense



## Appendix 1 – Reports Issued This Semiannual Period

### Audit Reports

#### Chief Financial Officer

2025-FO-0006	<a href="#">HUD Did Not Comply with the Payment Integrity Information Act of 2019, 05/13/2025. Questioned: \$212,208,450.</a>
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#### Community Planning and Development

2025-FW-0003	<a href="#">Disaster Recovery Biannual Report – October 2024 to March 2025, 04/11/2025.</a>
2025-FW-1001	<a href="#">New York State Can Improve Its Disaster Recovery Procurement Processes, 09/04/2025.</a>

#### Housing

2025-KC-0002	<a href="#">HUD's Office of Single Family Housing Did Not Consistently Monitor Its Field Service Management Contractors' Property Preservation and Protection Services, 05/27/2025.</a>
2025-NY-1003	<a href="#">Flat Branch Mortgage, Inc., Did Not Have a Sufficient Quality Control Program for FHA-Insured Loans, 06/20/2025. Better Use: \$228,793.</a>
2025-NY-1004	<a href="#">Neighborhood Loans, Inc., Did Not Have a Sufficient Quality Control Program for FHA-Insured Loans, Downers Grove, IL, 07/03/2025. Better Use: \$339,186.</a>

#### Public and Indian Housing

2025-BO-0003	<a href="#">Public Housing Authorities and Source of Income Discrimination, 08/13/2025.</a>
2025-CH-0002	<a href="#">HUD's Office of Public and Indian Housing Needs To Improve Its Oversight of Non-FHA-Insured PBV Projects Converted Under RAD, 06/26/2025. Questioned: \$1,005,913. Unsupported: \$1,005,913.</a>

### Evaluation Reports

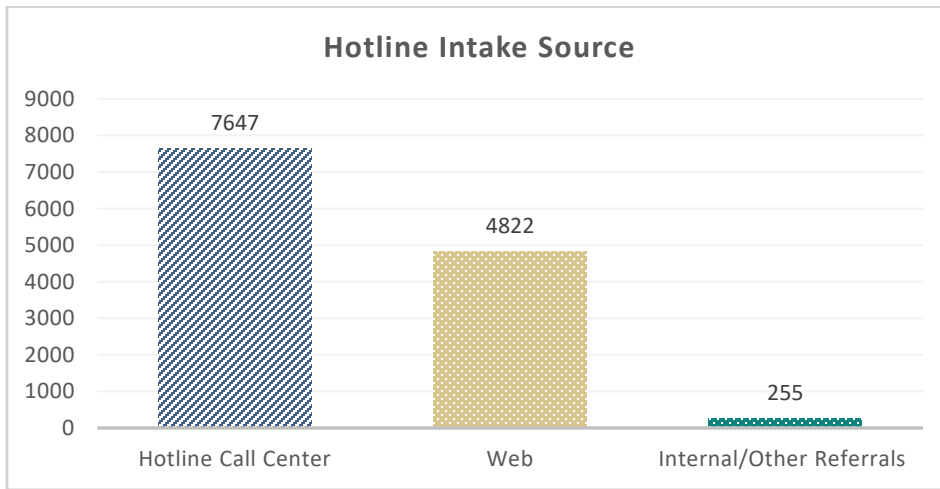
Report #	Report title
2025-OE-0801	<a href="#">HUD Should Better Track Elevated Blood Lead Levels in HUD-Assisted Multifamily Properties</a>

# Appendix 2 - Hotline Data

## Hotline Intakes:

The Hotline is the primary means to submit allegations of fraud, waste, abuse, mismanagement, or whistleblower-related matters within the U.S. Department of Housing and Urban Development (HUD) and HUD-funded programs to the Office of Inspector General (HUD OIG). During this semi-annual reporting period, the Hotline received 12,724 intakes, referred 6,083 to HUD program offices, and referred 674 to OIG components for further evaluation. Figure 1 provides a summary of the total number of intakes received as of September 30, 2025. Figure 2 provides a summary of the total number of intakes referred to HUD program offices as of September 30, 2025.

**Figure 1: Summary of hotline intakes**



**Figure 2: Summary of hotline intakes referred to HUD program offices:**

HUD program office	Count of program office
Public and Indian Housing	4,669
Housing & Federal Housing Administration	999
Community Planning and Development	203
Fair Housing and Equal Opportunity	161
Chief Human Capital Officer	36
Equal Employment Opportunity	3
Chief Financial Officer	2
Chief Information Officer	2
Field Policy and Management	2
Healthy Homes and Lead Hazard Control	2
Labor Standards and Enforcement	2
General Counsel	1
HUD Office of Administration	1
<b>Total</b>	<b>6,083</b>

# Appendix 3 - Streamlined Semiannual Reporting Requirements

Section 5273 of the Fiscal Year 2023 National Defense Authorization Act (NDAA) streamlines and modernizes semiannual reporting requirements and allows Offices of Inspector General (OIG) to better focus semiannual reports (SAR) on their most significant activities and most critical issues facing the agencies they oversee.

Below are the U.S. Department of Housing and Urban Development (HUD), OIG’s statutory requirements as set forth by the Inspector General Act, as amended by the NDAA, as well as the Trafficking Victims Prevention and Protection Reauthorization Act of 2022.

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

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

As of September 30, 2025, HUD OIG and HUD had not identified any systems that were noncompliant with the three elements of section 803(a) of FFMIA. HUD has closed all previous recommendations related to previously noncompliant systems.

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

Measure	Total
A. Total number of investigative reports issued during the reporting period	89
B. Total number of persons referred to the U.S. Department of Justice for criminal prosecution during the reporting period	32
C. Total number of persons referred to State and local prosecuting authorities for criminal prosecution during the reporting period	7
D. Total number of indictments and criminal informations during the reporting period that resulted from any prior referral to prosecuting authorities	28

### Footnotes

A. Includes approved reports of investigation

D. Includes all charging documents reported: criminal complaints, indictments, informations, and superseding indictments

### **Senior Government Employee Investigations – (a)(13)**

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

**None.**

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

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

**None.**

### **OIG Independence – (a)(15)**

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

**None.**

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

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

HUD OIG's FISMA CyberScope was not released to the public because the report is a controlled document and should be released only to those within HUD or to employees of an information technology contractor with a need to know. The report contains information on vulnerabilities within information systems and HUD processes that should not be released publicly.

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

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

HUD OIG successfully developed and incorporated human trafficking training into its the annual ethics training curriculum, which was completed by all HUD OIG employees. The training educated HUD OIG employees on

how to prevent, identify, and report trafficking in persons and assessed employees' understanding of the material with scenarios and challenge questions.

HUD OIG performed a review of records for this semiannual reporting period, which resulted in no reportable allegations of human trafficking as required by the Trafficking Victims Prevention and Protection Reauthorization Act of 2022.



## Appendix 4 - Reporting Table

New citation	New requirement (NDAA* for fiscal year 2023, sec. 5273)	Page number
(a)(1)	a description of significant problems, abuses, and deficiencies relating to the administration of programs and operations of the establishment and associated reports and recommendations for corrective action made by the Office	<u>11-29</u>
(a)(2)	an identification of each recommendation made before the reporting period, for which corrective action has not been completed, including the potential cost savings associated with the recommendation	<u>Table A</u> <u>Oversight.gov</u> <u>HUD OIG Open Recommendation Dashboard</u>
(a)(3)	A summary of significant investigations closed during the reporting period	<u>11-29</u>
(a)(4)	an identification of the total number of convictions during the reporting period resulting from investigations	<u>6</u>
(a)(5)	information regarding each audit, inspection, or evaluation report issued during the reporting period, including-- (A) a listing of each audit, inspection, or evaluation; (B) if applicable, the total dollar value of questioned costs (including a separate category for the dollar value of unsupported costs) and the dollar value of recommendations that funds be put to better use, including whether a management decision had been made by the end of the reporting period	<u>Appendix 1</u> <u>Table C</u> <u>Table D</u> <u>Table E</u> <u>HUD OIG Open Recommendation Dashboard</u>
(a)(6)	information regarding any management decision made during the reporting period with respect to any audit, inspection, or evaluation issued during a previous reporting period	<u>Table B</u>
(a)(7)	the information described under section 804(b) of the Federal Financial Management Improvement Act of 1996	<u>Appendix 3</u>
(a)(8)	(A) an appendix containing the results of any peer review conducted by another Office of Inspector General during the reporting period; or (B) if no peer review was conducted within that reporting period, a statement identifying the date of the last peer review conducted by another Office of Inspector General;	<u>34</u>
(a)(9)	list of any outstanding recommendations from any peer review conducted by another Office of Inspector General that have not been fully implemented, including a statement describing the status of the implementation and why implementation is not complete;	<u>34</u>
(a)(10)	a list of any peer reviews conducted by the Inspector General of another Office of the Inspector General during the reporting period, including a list of any outstanding	<u>34</u>

New citation	New requirement (NDAA* for fiscal year 2023, sec. 5273)	Page number
(a)(10)	recommendations made from any previous peer review (including any peer review conducted before the reporting period) that remain outstanding or have not been fully implemented;	<u>34</u>
(a)(11)	statistical tables showing (A) the total number of investigative reports issued during the reporting period; (B) the total number of persons referred to the Department of Justice for criminal prosecution during the reporting period; (C) the total number of persons referred to State and local prosecuting authorities for criminal prosecution during the reporting period; and (D) the total number of indictments and criminal informations during the reporting period that resulted from any prior referral to prosecuting authorities;	<u>Appendix 2</u>
(a)(12)	a description of the metrics used for developing the data for the statistical tables under paragraph (11);	<u>Appendix 2</u>
(a)(13)	a report on each investigation conducted by the Office where allegations of misconduct were substantiated involving a senior Government employee or senior official (as defined by the Office) if the establishment does not have senior Government employees...	None
(a)(14)	(A) a detailed description of any instance of whistleblower retaliation, including information about the official found to have engaged in retaliation; and (B) what, if any, consequences the establishment actually imposed to hold the official described in subparagraph (A) accountable;	None
(a)(15)	information related to interference by the establishment, including -  (A) a detailed description of any attempt by the establishment to interfere with the independence of the Office, including— (i) with budget constraints designed to limit the capabilities of the Office; and (ii) incidents where the establishment has resisted or objected to oversight activities of the Office or restricted or significantly delayed access to information, including the justification of the establishment for such action;  (B) a summary of each report made to the head of the establishment under section 6(c)(2) during the reporting period;	None

New citation	New requirement (NDAA* for fiscal year 2023, sec. 5273)	Page number
(a)(16)	Detailed descriptions of the particular circumstances of each - (A) Inspection, evaluation, and audit conducted by the Office that is closed and was not disclosed to the public; and (B) Investigations conducted by the office involving a senior government employee that are closed and not disclosed to the public.	None

\* National Defense Authorization Act

## Appendix 5 - Acronyms and Abbreviations

<b>AFCA</b> —Administrative False Claims Act	<b>ICE</b> —Immigration and Customs Enforcement
<b>CDBG</b> —Community Development Block Grant	<b>IG</b> —Inspector General
<b>CDBG-DR</b> —Community Development Block Grant Disaster Recovery	<b>InfoSec</b> —Information security program
<b>CPD</b> —Community Planning and Development	<b>IT</b> —Information technology
<b>CPD ODR</b> —Office of Community Planning and Development Office of Disaster Recovery	<b>MF-PBRA</b> —Office of Multifamily Housing Project-Based Rental Assistance (program)
<b>DHS</b> —U.S. Department of Homeland Security	<b>NDAA</b> —National Defense Authorization Act
<b>DNP</b> —Do Not Pay	<b>NYCHA</b> —New York City Housing Authority
<b>DRGR</b> —Disaster Recovery Grant Reporting	<b>MOU</b> —Memorandum of Understanding
<b>EBLL</b> —elevated blood lead levels	<b>OCFO</b> —Office of the Chief Financial Officer
<b>EEO</b> —Equal Employment Opportunity	<b>OFO</b> —Office of Field Operations
<b>ESG</b> —Emergency Solutions Grant	<b>OIG</b> —Office of Inspector General
<b>FFMIA</b> —Federal Financial Management Improvement Act	<b>OMB</b> —Office of Management and Budget
<b>FHA</b> —Federal Housing Administration	<b>PFCRA</b> —Program Fraud Civil Remedies Act
<b>FISMA</b> —Federal Information Security Modernization Act of 2014	<b>PHA</b> —public housing authority
<b>FR</b> —Federal Register	<b>PIH</b> —Office of Public and Indian Housing
<b>FSM</b> —Field Service Management	<b>PIIA</b> —Payment Integrity Information Act of 2019
<b>FY</b> —fiscal year	<b>PVB</b> —Project-based vouchers
<b>Ginnie Mae</b> —Government National Mortgage Association	<b>RAD</b> —Rental Assistance Demonstration (Program)
<b>HCVP</b> —Housing Choice Voucher (Program)	<b>REAC</b> —Real Estate Assessment Center
<b>HOME</b> —Home Investment Partnerships (Program)	<b>REO</b> —RealEstate owned
<b>HUD</b> —U.S. Department of Housing and Urban Development	<b>QC</b> —quality control
	<b>SAR</b> —Semiannual Report to Congress
	<b>USAO</b> —U.S. Attorney’s Office
	<b>U.S.C.</b> —United States Code
	<b>VASH</b> —Veterans Affairs Supportive Housing
	<b>WPEA</b> —Whistleblower Protection Enhancement Act





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