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OFFICE OF INSPECTOR GENERAL FOR AUDIT

Audit Memorandum
No. 2002-DE-1801

March 12, 2002

MEMORANDUM FOR: Ronald C. Bailey, Director, Denver Homeownership Center, 8AHH

Robert C. Gwin

FROM: Robert C. Gwin, District Inspector General for Audit, 8AGA

SUBJECT: American Union Mortgage, Inc., Sandy, Utah

INTRODUCTION

We have completed an audit of American Union Mortgage, Inc. (American Union), Sandy, Utah. The objectives of the audit were to:

- Determine whether the mortgagee acted in a prudent manner and complied with HUD regulations, procedures, and instructions in the origination of the FHA-insured loans selected for review; and
- Determine whether the mortgagee's quality control plan, as implemented, meets HUD requirements.

Our audit approach was to identify and evaluate the management controls in place over American Union's loan origination and quality control procedures and ensure established procedures met HUD's Single Family Direct Endorsement Program requirements. During the review, we examined program records and related documents of American Union for FHA-insured loans originated between September 1, 1999 and August 31, 2001. We also reviewed applicable HUD records (e.g., FHA case binders) relating to American Union's loan origination activities. We conducted interviews with staff and contractors of these organizations. Furthermore, we conducted inspections of selected FHA-insured properties and interviewed the available mortgagors.

Our audit generally covered the period of September 1, 1999 through August 31, 2001. However, this period was expanded to include the most current data while performing our site

review. Therefore, where applicable, the audit period was expanded to include current data through January 23, 2002. We conducted our field work from October through December 2001. The preliminary draft audit memorandum was presented to American Union for their review and comment on February 12, 2002. Their written response is included in Appendix A.

Our review was conducted in accordance with generally accepted government auditing standards.

BACKGROUND

HUD insures mortgages made by private lending institutions under Section 203 of the National Housing Act (12 U.S.C. 1709). HUD designates these institutions as supervised, non-supervised, loan correspondent or investing lenders and mortgagees. Dependent upon their designation, the institutions have the authority to originate, purchase, sell or service HUD FHA-insured mortgages. Specifically, a loan correspondent can only originate loans for an approved non-supervised mortgagee (sponsor).

American Union Mortgage, Inc. (American Union) was established on November 18, 1993, as a State of Utah for-profit corporation. American Union was approved by HUD as a Title II non-supervised loan correspondent on May 26, 1994. American Union is located at 9176 South 300 West, Suite 22, Sandy, Utah 84070.

As a non-supervised loan correspondent, American Union's principle activity is the origination of mortgages for sale or transfer to an approved sponsor under the HUD Single Family Direct Endorsement Program. The sponsor is responsible to HUD for the actions of its loan correspondent in originating insured mortgages. The sponsor underwrites the loans originated by the loan correspondent and is also required to supervise and perform quality control reviews of its loan correspondent(s). The sponsor must be an approved mortgagee that is also authorized to participate in the HUD Single Family Direct Endorsement Program.

During the audit period American Union had a total of 31 sponsors for its Title II loan originations. American Union contracted with 116 independent loan officers in 2000 and 146 independent loan officers in 2001 to perform loan origination functions.

From September 1, 1999 through August 31, 2001, American Union's sponsors endorsed 1,492 loans with a total mortgage amount of \$177,143,149. As of January 23, 2002, of the 1,492 FHA-insured loans, 93 loans are currently in default and foreclosure action has been initiated on 9 of the loans. Furthermore, HUD has paid claims on 12 of the loans, totaling \$1,030,152.

RESULTS OF REVIEW

We reviewed American Union's loan origination and quality control procedures for the origination of FHA-insured loans. We found the loan origination and quality control procedures established by American Union need to be modified in order to ensure that it is carrying out its responsibilities as a HUD approved non-supervised loan correspondent. Specifically, there are two areas that require improvement: (1) usage of independent contract loan officers; and (2)

establishment and implementation of management controls to effectively oversee its loan origination procedures. These areas are discussed in the finding below.

FINDING – Improvement Needed in the Origination of FHA-Insured Loans

Our review of American Union's management controls over its loan origination and quality control procedures for the origination of FHA-insured loans showed American Union not to be in compliance with HUD requirements in two areas:

- American Union used independent contract loan officers to originate FHA-insured loans, in American Union's name; and,
- American Union did not have sufficient management controls necessary to effectively oversee its loan origination procedures.

American Union has been using independent contract loan officers to perform all loan origination functions, including those functions that are required by HUD regulations to be performed only by American Union employees. American Union established Mortgage Loan Origination Agreements with its independent contract loan officers, requiring exclusivity to American Union, as they felt this would bring their loan origination operations in compliance with HUD requirements. In addition, American Union has not actively participated in the loan origination process performed by its independent contract loan officers. American Union relied solely on its Direct Endorsement Mortgagee (sponsor) as its checks and balance for the propriety of information contained in loan origination packages.

HUD needs to ensure that American Union uses full or part time employees to originate FHA insured loans in their name; and HUD also needs to make certain that American Union develops and implements a management control process that will ensure all loan origination functions are monitored for compliance with HUD requirements. In addition, the management control process must be able to ensure all deficiencies noted in the loan origination process are corrected prior to submission of the loan to the sponsor.

HUD Requirements: The Federal Register, dated March 1, 1999, Part IV, addressed Title 24 of the Code of Federal Regulations, Part 3500. The Federal Register included the Real Estate Settlement Procedures Act Statement of Policy 1999-1, which stated that HUD identified 14 services or functions normally performed in the origination of a loan by the loan correspondent. Mortgagee Letter 95-36 stated that customary loan officer functions may not be contracted out, as mortgagees are held responsible for the quality of loans and compliance with HUD requirements. More specifically, loan origination functions may not be contracted out to third party loan originators, real estate brokers and other similar entities.

HUD Handbook 4060.1 REV-1, para. 2-13, Control and Supervision of Employees, states that mortgagees are required to exercise control and responsible management supervision over their employees. The requirement regarding control and supervision must include, at a minimum, regular and ongoing reviews of employee performance and of work performed.

HUD Handbook 4060.1 REV-1, para. 2-16, Office Facilities, and para. 2-17, Operating Expenses, which requires a mortgagee to maintain adequate office space in a location conducive to performing mortgage lending business. A mortgagee's employees are not permitted to use their signatory authority to bind the mortgagee in a home, car or similar space that is not a part of the mortgagee's office. In addition, a mortgagee is required to pay all of its operating expenses. This includes the compensation of employees of its main and branch offices. The operating expenses that must be paid by the mortgagee include, but are not limited to, equipment, furniture, office rent, overhead, and other similar expenses incurred in operating a mortgage lending business.

HUD Handbook 4060.1 REV-1, Chapter 6, Quality Control Plan, states that as a condition of HUD/FHA approval, mortgagees including loan correspondents must have and maintain a quality control plan for the origination and servicing of insured mortgagees. The quality control plan must be sufficient in scope to enable the mortgagee to evaluate the accuracy, validity and completeness of its loan origination and servicing operations. It must provide for the independent evaluation of the significant information gathered for use in the mortgage credit decision making and loan servicing process for all loans originated or serviced by the mortgagee. And it must enable the mortgagee to initiate immediate corrective action when discrepancies are found.

Use of Independent Contracted Loan Officers: At the time of our review, American Union was using independent contract loan officers to carry out the required loan origination functions. American Union established Mortgage Loan Origination Agreements (Agreement) with its independent contract loan officers that required exclusivity and contained various clauses that indemnified American Union from any risk associated with loans originated by its independent contract loan officers. More specifically, per the Agreement "the MLO (Mortgage Loan Originator) hereby agrees that it and its agents will act as an independent contractor and not as an employee of AUM (American Union Mortgage)."

American Union subsequently revised the Agreement in early 2001. The revised Agreement omitted the various clauses that indemnified American Union against acts of its independent contract loan officers. However, American Union still remained in variance with HUD requirements as they continued to use independent contract loan officers to perform all functions, relating to the origination of FHA-insured mortgages that are to be performed by employees. In addition, American Union allowed non HUD approved entities to originate FHA-insured loans through American Union.

American Union pays its independent contract loan officers a commission for each FHA-insured loan originated and closed. The commission is calculated based on the gross loan origination fee actually received by American Union at closing, less a \$450 administration fee per loan closed, less any bonus fees received from lenders, less any loan fees and

expenses related to the loan origination. The loan fees and expenses have been limited to: appraisal, credit report, processing and inspection fees. American Union issues IRS form 1099 to its independent contract loan officers for all commissions received.

American Union takes responsibility for maintaining the corporate office and related expenses and general overhead. American Union does not pay or reimburse its independent contract loan officers for other costs relating to the loan origination process, as the corporate office is available to the independent contract loan officers for their use, if the independent contract loan officer so chooses. Interviews with various independent contract loan officers who worked out of their homes or other office spaces indicated that American Union did not pay for nor reimburse costs other than the loan fees and expenses discussed previously.

The corporate office contained office space for the American Union president, manager, receptionist¹, administrative assistant, and an assistant, and included a conference room. The corporate office is located on the second floor and is not handicapped accessible.

We reviewed American Union's schedules for loans closed in 2000, and loans closed and in process in 2001. American Union was unable to provide information concerning loans closed during 1999, as they purge both paper and electronic documents/files, every 2 years. We analyzed the schedules and found that American Union contracted with 116 independent contract loan officers in 2000 and 146 independent contract loan officers² in 2001. According to American Union records, a total of 659 FHA-insured loans were closed in 2000, while 1,404 FHA-insured loans had been closed in 2001 and 277 FHA-insured loans were in process as of December 11, 2001.

In 2000, independent contract loan officers received commissions³ from \$853 for 1 loan origination to \$307,450 for 60 loan originations. In 2001, independent contract loan officers received commissions⁴ from \$1,129 for 1 loan origination to \$323,526 for 132 loan originations.

Prior Title II origination reviews performed by the HUD Salt Lake City Field Office Quality Assurance Division staff disclosed that American Union was allowing non HUD approved entities to originate FHA-insured loans using their HUD approval as a non-supervised loan correspondent. The Quality Assurance Division staff informed American Union that this practice was at variance with HUD requirements. However, interviews with former American Union independent contract loan officers, during our review, indicated that American Union continued the practice of allowing non HUD approved entities to originate FHA-insured loans using their HUD approval status. In addition, State of Utah mortgagee

¹ The receptionist, along with the conference room, is shared with other business entities within the office building.

² The number of independent contract loan officers was based on closed loans in 2000 and closed loans and loans in process in 2001.

³ American Union records for closed loans in 2000 did not include IRS form 1099 for 47 of the 116 independent contract loan officers.

⁴ American Union records for closed loans in 2001 did not include IRS form 1099 amounts for 17 independent contract loan officers.

databases showed current independent contract loan officers as president/owner and listed broker for mortgage companies other than American Union.

A former independent contract loan officer, who at the time owned and originated non FHA-insured loans through another mortgage company, was informed by American Union that the practice was acceptable. The former contract loan officer was told that American Union would not say anything about the arrangement as long as the former contract loan officer did not say anything either. The former contract loan officer continued to originate FHA-insured loans through American Union, until finding out from a colleague that the practice was against HUD requirements. The former contract loan officer's mortgage company has subsequently received HUD approval as a non-supervised loan correspondent, and no longer originates FHA-insured loans through American Union.

Insufficient Management Controls Over Loan Origination Procedures: The loan origination procedures in place at the time of our review provided that the independent contract loan officers would perform all functions relating to the origination of an FHA-insured mortgage. The independent contract loan officers responsibilities entailed, but were not limited to the following:

- Generation of leads for potential FHA-insured loan candidates.
- Completion of a loan application and ensure all proper disclosures were properly completed and signed according to all regulations.
- Management of the processing of loans, locking the loan interest rate, ordering the closing documents and scheduling of closings.
- Selection of loan processors and sponsors from American Union provided listings.
- Resolving deficiencies identified during the sponsor's loan underwriting process and/or quality control reviews.
- Execution of loan origination and closing documentation on behalf of American Union.
- Attendance at loan closing for collection of the loan commission check from the Title Company.
- Delivery of the loan commission check and a complete copy of the loan origination package to American Union.
- Completion of a commission worksheet detailing the names of vendors (e.g., credit bureaus, appraiser, and inspectors) and amounts owed.

American Union's participation in the loan origination process was limited to the issuance of the FHA case number, performance of the required borrower credit eligibility searches⁵, and disbursement of the loan commission check for an administrative fee of \$450. American Union did not actively participate in the loan origination process performed by its independent contract loan officers. American Union relied solely on its sponsors as its checks and balance for the propriety of information contained in the loan origination packages.

In addition, we found the quality control plan in place for a portion of the audit period was insufficient and did not meet HUD requirements. Any quality control reviews performed by American Union were cursory in nature, and would not have detected deficiencies in the loan origination packages.

We obtained a copy of the quality control plan and results from a quality control review performed by American Union from the HUD Salt Lake City Field Office Quality Assurance Division. American Union was unable to provide a copy of their quality control plan and related reviews prior to April 2001 as they purge both paper and electronic documents/files every 2 years.

Review of the quality control plan effective January 3, 2000 disclosed the plan to not be in compliance with HUD requirements. The quality control plan contained numerous deficiencies. To illustrate, the plan did not meet the HUD loan sample requirements, that require an originating mortgagee to review either: (1) the lesser of 10 percent of all loans closed on a monthly basis; or (2) a random sample that provides a 95 percent confidence level with 2 percent precision. American Union's loan sample requirements consisted solely of a selection of "...a verity [sic] of loans to review, including conforming, government and non-conforming loans."

In addition, the plan did not ensure that a written reverification of the mortgagor's employment, deposits, gift letter or other source of funds is completed. The quality control and compliance report for the 3rd quarter calendar year 2000 consisted solely of verification of dates when mortgagors executed various documents during the loan origination process.

On February 22, 2001, American Union entered into a contract with an independent company for the purpose of implementation and operation of a quality control system. The independent company is responsible for evaluating 10 percent of all American Union's loan origination packages to assure the closed loans met HUD Single Family Direct Endorsement Program requirements. The independent company's quality control review responsibilities commenced with a review of closed loans beginning the month of April 2001. We reviewed the quality control plan and reviews for April, May, June, and July 2001 and found the plan and reviews to be comprehensive and sufficient to meet HUD requirements.

⁵ As part of the determination of borrower credit eligibility, mortgagees are required to perform a CAIVRS (Credit Alert Interactive Voice Response System) search, review of HUD's LDP (Limited Denial of Participation) list, and review of GSA's "List of Parties Excluded from Federal Procurement or Non Procurement Programs."

Property Inspections and Mortgagor Interviews

Using a non-statistical sample, we examined a total of 12 FHA-insured loans originated by American Union for review. We reviewed files maintained by HUD and American Union for the 12 FHA-insured loans. Of the 12 FHA-insured loans, independent contract loan officers originated 9 of the loans. The president of American Union originated the remaining 3 loans.

We visited 11 of the 12 properties⁶ for inspection and mortgagor interview. As of October 16, 2001, 11 of the 12 loans had an insurance status of "Active", while the remaining loan had an insurance status of "Claim". At the time of our inspections and mortgagor interviews on December 19, 2001, 5 of the 11 "Active" properties were vacant. Of the 5 vacant properties, 3 were in the process of trustee sale by the loan servicing lender. We questioned the occupancy status of 1 property since the upper level was vacant and left unsecured, while the lower level was secured and appeared to be occupied. We were able to interview 2 of the remaining 5 mortgagors, whose loans were in default at the time of our visit.

As of January 23, 2002, HUD has paid claims totaling \$432,379 for 4 of the 12 properties. Of the remaining 8 properties, 5 are currently in default.

Increase in Default Rates of FHA-Insured Loans: During our review, we saw a significant increase in American Union's default rates for the 1,492 FHA-insured loans originated between September 1, 1999 and August 31, 2001.

In October 24, 2001, 55 of the 1,492 FHA-insured loans were in default, while 93 of the 1,492 FHA-insured loans were in default as of January 23, 2002. This represents an increase in the default rate of 69 percent from October 2001 to January 2002 for the same 1,492 FHA-insured loans. HUD had paid claims on 12 of the 93 loans, totaling \$1,030,152.

Impact of Deficient Loan Origination and Quality Control Procedures: American Union has chosen to use independent contract loan officers to perform all functions of the loan origination process that HUD requires employees of a mortgagee to perform. Certain loan origination functions are to be performed only by employees of the mortgagee and not by third party contractors. As a result, American Union did not have direct control and supervision over its loan officers as required by HUD.

American Union's practice of relying on its sponsors as its checks and balance for the propriety of information contained in loan origination packages is at variance with HUD requirements. At a minimum, HUD requires mortgagees to perform regular and ongoing reviews of employee performance and work performed. As a result, American Union lacks assurance that loans originated under its current procedures are originated in accordance with HUD requirements. Thus, further increasing the risk to the FHA insurance fund.

⁶ We chose only to visit those properties with an "Active" FHA-insured loan.

Deficiencies in Carrying Out Loan Origination Activities Stem from Two Causes: In our opinion, the deficiencies addressed above in American Union's loan origination and quality control procedures stem from two primary causes:

- American Union misapplied HUD requirements in its origination of FHA-insured loans; and
- Did not want to take part in the risk associated with the origination of FHA-insured loans.

Misapplied HUD Requirements First, review of American Union's FHA-insured loan origination activities has demonstrated that they misapplied HUD requirements. American Union contracted with independent contract loan officers to perform all loan origination functions, including those functions that are required by HUD regulations to be performed only by American Union employees. Furthermore, American Union allowed non HUD approved mortgagees who operated under the guise of exclusivity to originate FHA-insured loans using American Union's Title II non-supervised loan correspondent status. These non HUD-approved mortgagees were allowed to originate FHA-insured loans without having to meet HUD's established mortgagee approval requirements for participation in the HUD Single Family Direct Endorsement Program. One independent contract loan officer was allowed to originate a total of 117 FHA-insured loans with total paid commissions of \$473,509 during calendar years 2000 and 2001. The independent contract loan officer was listed as the president and broker by the State of Utah for another mortgage company while performing loan origination functions for American Union.

Transference of Risk and Responsibilities Secondly, American Union did not want to take part in the risk associated with the origination of FHA-insured loans as evidenced by the Mortgage Loan Origination Agreements (Agreements) established with independent contract loan officers. The Agreements between American Union and its independent contract loan officers required exclusivity, as they felt this would bring their loan origination operations in to compliance with HUD requirements. However, these Agreements contained various clauses that indemnified American Union from any risk associated with loans originated by its independent contract loan officers.

American Union has subsequently revised the Agreements, excluding the various clauses relating to indemnification. However, contrary to HUD requirements, American Union continues to use independent contract loan officers to perform FHA-insured loan origination activities that are to be performed by employees, not third party contractors.

During our review, we found that American Union did not perform regular and ongoing reviews of independent contract loan officer performance and of work performed as required by HUD. American Union relied solely on its sponsors as its checks and balance for the propriety of information contained in loan origination packages.

In summary, as shown by the discussions above, American Union's loan origination and quality control procedures did not meet HUD requirements for approved non-supervised loan correspondents under the HUD Single Family Direct Endorsement Program.

American Union and HUD can benefit from the discontinued use of independent contract loan officers to perform loan origination activities that are required by HUD to be performed by employees of American Union. By bringing the independent contract loan officers in as full or part time employees, American Union will be better able to exercise control and responsible management supervision over its employees and related loan origination activities.

In addition, American Union needs to develop and implement a management control process that will ensure all loan origination functions are monitored for compliance with HUD requirements. The management control process must be able to ensure all deficiencies noted in the loan origination process are corrected prior to submission of the loan to the sponsor. By doing so, American Union and HUD will have better assurance that FHA-insured loans originated by American Union meet HUD Single Family Direct Endorsement Program requirements. Thus, further minimizing the risk to the FHA insurance fund.

Auditee Response

American Union officials provided their written response on February 22, 2002. The entire response is included in Appendix A. American Union did not agree with two statements made in the audit memorandum and deemed the statements to be inaccurate. Both statements that American Union does not agree with stem from the same assertion that they did not allow non HUD approved entities to originate FHA-insured loans using American Union's HUD approval. In addition, American Union referenced the agreements it established with its originators that required exclusivity as their means to ensure compliance with HUD requirements.

Contrary to American Union's assertion, our review disclosed that American Union allowed non HUD approved entities to originate FHA-insured loans through American Union. Prior Title II loan origination reviews performed by the HUD Salt Lake City Field Office Quality Assurance Division staff disclosed the same practice. Reliance on an agreement with its originators requiring exclusivity does not release American Union from its responsibility to actively monitor its originators and review their work on an ongoing basis. American Union is responsible for ensuring its loan origination activities are performed in compliance with HUD Single Family Direct Endorsement Program requirements.

We acknowledge that American Union has instituted changes to their loan origination and quality control procedures they believe will resolve concerns of noncompliance with HUD requirements. However, American Union needs to demonstrate to HUD that it has implemented these changes and are in compliance with HUD Single Family Direct Endorsement Program requirements.

Recommendations

We recommend that the Denver Homeownership Center:

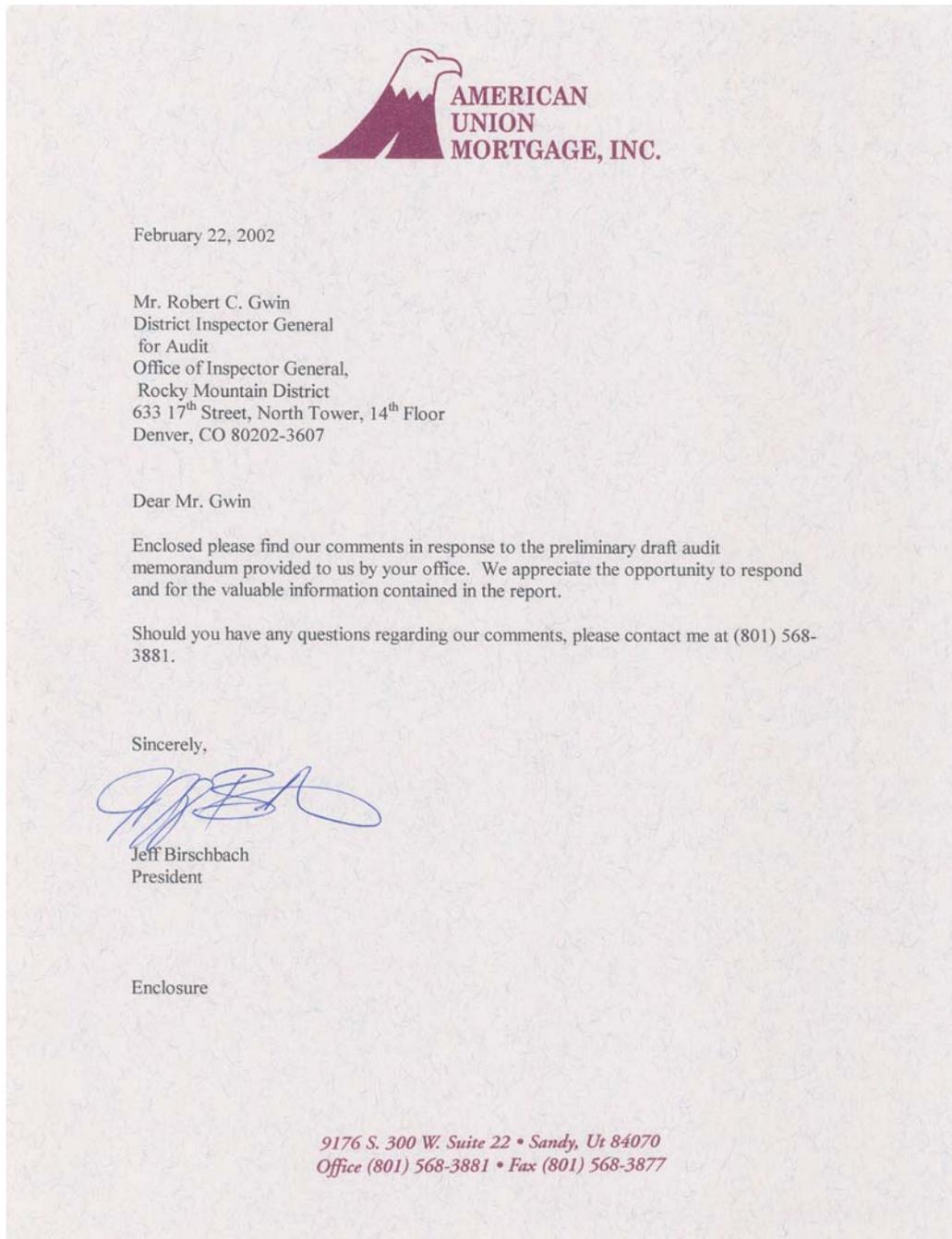
- 1A. Require American Union to come into compliance with HUD requirements by making all independent contracted loan officers full or part time employees.
- 1B. Direct American Union to develop and implement a management control process that will ensure all loan origination functions are monitored for compliance with HUD requirements. Also, the management control process must ensure any deficiencies noted in the loan origination process be corrected prior to submission of the loan to the Direct Endorsement Mortgagee.
- 1C. Review American Union's implementation of recommendations 1A and 1B and ensure that American Union's loan origination procedures and management control process are in conformity with HUD requirements.

These recommendations will be controlled under the Departmental Automated Audit Management System. Within 60 days please furnish to this office, for each recommendation in this report, a status report on: (1) the corrective action taken; (2) the proposed corrective action and the date to be completed; or (3) why action is considered not necessary. Also, please furnish us copies of any correspondence or directives issued because of the audit.

We appreciate the courtesies and assistance extended by the personnel of the American Union Mortgage, Inc. and the personnel of the Denver Homeownership Center and Salt Lake City Field Office Quality Assurance Divisions. Should you have any questions please contact Ernest Kite, Assistant District Inspector General for Audit, at (303) 672-5452.

Appendix A

Auditee's Comments:



AUDITEE'S RESPONSE

Audit Memorandum
No. 2002-DE-1801

February 22, 2002

As management of American Union Mortgage, Inc., we reviewed the Audit Memorandum No. 2002-DE-1801. We would like to respond to items in the audit in two separate categories. The first would be statements we feel are inaccurate depictions of our intent and previous policies and the second will be items of concern that we have made changes to or are currently in the process of changing.

1) There are two items mentioned in the Audit that we would deem as inaccurate statements.

The first item is on page 4, paragraph 4, last line.

“In addition, American Union allowed non HUD approved entities to originate FHA-insured loans through American Union.”

According to the agreement that our originators had with us, anyone working for another mortgage company was not allowed to originate with us. We are aware that some of our originators had previously owned their own mortgage companies. Some did not file dissolution papers with the state. However, prior to working with American Union, these companies were dormant. To ensure that none of our loan officers have any ownership in another mortgage company, we are requesting registration information from the Department of Commerce for every loan officer. If we find any loan officer with ownership in another mortgage company, we will request immediate documentation of dissolution of that entity or they will be terminated.

The second item starts on the last line of page 5 and the first paragraph on page 6.

“See Audit”

We're not sure why a person that works for our **competition** would make this statement. Again, it is our policy as per our agreement that our originators may only originate for American Union.

2) These are changes that we have made or are in the process of making that we believe will resolve concerns of non compliance.

In January 2002 we announced to all loan officers that we are making three changes regarding their employment status.

- 1- Discontinuation of the loan origination agreement.
- 2- All loan officers must fill out an employment application.
- 3- All loan officers will be compensated as W-2 employees starting February 1, 2002.

We are also implementing certain policies and procedures as well as administrative changes to ensure sufficient controls over the loan officers. They are as follows.

- 1- We will be performing ongoing interviews with all loan officers covering performance, loan quality, default rate, quality control report results and production.
- 2- We will be selecting random loans in process for review.
- 3- We are going to continue our monthly training meetings.
- 4- Testing of potential new loan officers as well as ongoing testing of existing employees.
- 5- Reimbursement forms for the loan officers to refund possible business expenses.
- 6- We have also spent \$30,000.00 in expansion of office space, workstations, internet access, phones, equipment and security during February 2002. Our additional space is now handicapped accessible.

Because of the changes listed above, this will completely alter our prior loan origination process.

We appreciate the time and efforts of the representatives of the Office of Inspector General. The information and insight provided to us has been tremendous. If there are any items of concern that we have not addressed or any other area of improvement we can make, please let us know.

Sincerely,



Jeff Birschbach
President

Appendix B

Distribution

American Union Mortgage, Inc.
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 President, Ginnie Mae, T, Room 6100
 Assistant Secretary for Congressional and Intergovernmental Relations, J, Room 10120
 Assistant Secretary for Housing/Federal Housing Commissioner, H, Room 9100
 Assistant Secretary for Community Planning and Development, D, Room 7100
 Assistant Secretary for Public and Indian Housing, P, Room 4100
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 Director, Office of Departmental Operations and Coordination, I, Room 2124
 Director, Office of Federal Housing Enterprise Oversight, O, Room 4011
 Director, Office of Healthy Homes and Lead Hazard Control, L, Room P3206
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 General Deputy Assistant Secretary for Policy Development and Research, R, Room 8100
 General Deputy Assistant Secretary for Fair Housing and Equal Opportunity, E, Room 5100
 General Deputy Assistant Secretary for Administration, A, Room 10156
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Steve Redburn, Chief Housing Branch, Office of Management and Budget, 725 17th Street, NW, Room 9226, New Executive Office Bldg., Washington, DC 20503

Linda Halliday (52P), Department of Veterans Affairs, Office of Inspector General, 810 Vermont Ave., NW, Washington, DC 20420

William Withrow (52KC), Department of Veterans Affairs, OIG Audit Operations Division, 1100 Main, Rm 1330, Kansas City, Missouri 64105-2112

The Honorable Joseph Lieberman, Chairman, Committee on Government Affairs, 706 Hart Senate Office Bldg., United States Senate, Washington, DC 20510

The Honorable Fred Thompson, Ranking Member, Committee on Governmental Affairs, 340 Dirksen Senate Office Bldg., United States Senate, Washington, DC 20510

The Honorable Dan Burton, Chairman, Committee on Government Reform, 2185 Rayburn Bldg., House of Representatives, Washington, DC 20515

The Honorable Henry A. Waxman, Ranking Member, Committee on Government Reform, 2204 Rayburn Bldg., House of Representatives, Washington, DC 20515

Andy Cochran, House Committee on Financial Services, 2129 Rayburn H.O.B., Washington, DC 20515

Clinton C. Jones, Senior Counsel, Committee on Financial Services, U.S. House of Representatives, B303 Rayburn H.O.B., Washington, DC

Deputy Staff Director, Counsel, Subcommittee on Criminal Justice, Drug Policy and Urban Resources, B373 Rayburn House Office Building, Washington, DC 20515

Steve Redburn, Chief, Housing Branch, Office of Management and Budget, 725 17th Street, NW, Room 9226, New Executive Office Building, Washington, DC 20503

Andy Cochran, House Committee on Financial Services, 2129 Rayburn H. O. B., Washington, DC 20515